Lewisham Local Plan

Regulation 18 Consultation Statement

Report on the consultation of the
Lewisham Local Plan: Main Issues and Preferred Approaches document

September 2022

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1 Background

1.1 About this Consultation Statement

1.1.1. Lewisham council ("the council") is preparing a new Local Plan. This involves a review and update of the council's adopted planning policies. The National Planning Policy Framework (NPPF) makes clear that local plans should "be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees".

1.1.2. This Consultation Statement details how Lewisham council undertook public consultation at the early stages of the plan-making process and how consultation responses were used to inform the preparation of the Local Plan. It focusses principally on the Regulation 18 stage consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document ("draft Local Plan") and supporting materials, which was carried out from 15th January to 11th April 2021. Information is also included on engagement activities carried out prior to and following this consultation.

1.1.3. This report should be read together with the Regulation 18 Consultation Statement: Report on the Consultation on Main Issues (March 2020). The report provides details about consultation carried out during the initial stages of the Local Plan review. This includes the first Regulation 18 consultation on the Main Issues held from 9th October to 20th November 2015.

1.1.4. This Consultation Statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). These regulations require the council to publish a statement setting out which bodies and persons were invited to make representations under Regulation 18; how those bodies and persons were invited to make such representations; a summary of the main issues raised by those representations; and how those main issues have been addressed in the Local Plan.

1.2 About the Lewisham Local Plan

1.2.1. The Lewisham Local Plan is the main strategic planning policy document prepared by the council. It sets out a long-term development and investment strategy for the Borough along with planning policies and guidelines to implement this. The Local Plan must be prepared in accordance with the processes and procedures set out by legislation.

1.2.2. The Local Plan must be consistent with the National Planning Policy Framework (2021). The NPPF sets out the Government's planning policies for England and how they should be applied. It includes parameters for the preparation of local plans and is also a material consideration in planning decisions.

1.2.3. The Local Plan must also be in general conformity with the London Plan, which is produced by the Mayor of London. The London Plan (2021) is the spatial development strategy for Greater London. It helps to ensure a coordinated approach to planning across London and provides a direction for London borough councils on what they should do in preparing local plans.

1.3 Local Plan review

1.3.1. Lewisham council currently has an adopted Local Plan. It comprises the Lewisham Core Strategy (2011), Site Allocations (2013), Development Management (2014) and Lewisham Town Centre Local Plan (2014) documents. The new Local Plan involves a review and update of these plans, which will bring them together into a single document.

1.3.2. The preparation of a local plan involves several key stages. These stages are prescribed by planning legislation. This includes the undertaking of several rounds of public consultation before a draft local plan can be submitted to the Secretary of State for an examination in public. The examination is overseen by an appointed Planning Inspector. A local plan can only be adopted and brought into force if it passes the examination. This means that the council has satisfied the legal and procedural requirements for preparing the plan and has also met the ‘tests of soundness’ set out in the National Planning Policy Framework.

1.3.3. The Planning and Compulsory Purchase Act 2004 (as amended) requires the council to publish a Statement of Community Involvement (SCI). The SCI is a document that sets how the council will inform and involve local communities and other stakeholders in the preparation of planning policies for the Borough, as well as the determination of planning applications.

1.3.4. The Planning and Compulsory Purchase Act 2004 (as amended) also requires the council to publish and maintain a Local Development Scheme (LDS). The LDS includes information on the planning policy documents the council intends to prepare along with the timescales for their production, including public consultation programmed at key stages in the plan-making process. The LDS helps to ensure that local residents, community groups and others with an interest in the Borough are informed about consultation opportunities.

Table 1.1 Key stages in the local plan process[1]

Key stage	What is involved?
Regulation 18	Preparation of the local plan including public consultation on the scope of the local plan and the policy proposals
Regulation 19	Publication of the local plan and public consultation on the 'proposed submission document'
Regulation 22-25	Submission of the local plan and other information to the Secretary of State and Examination in Public
Regulation 26	Adoption of the local plan

2 What we consulted on

2.1 Initial Regulation 18 consultation on the Main Issues

2.1.1. An initial Regulation 18 stage consultation was held in 2015 to set the scope of the Local Plan review. The council carried out a six-week public consultation from 9th October 2015 to 20th November 2015. This involved a consultation on 3 documents:

- Lewisham Local Plan – Consultation on Main Issues
- Local Plan Sustainability Appraisal Scoping Report
- Infrastructure Delivery Plan - Framework Document

2.1.2. A consultation questionnaire was published alongside these documents. It included questions organised around the main policy topic areas in the Local Plan – Consultation on Main Issues Document. The public was invited to complete the questionnaire and submit it to the council for consideration.

2.1.3. A total of 41 written representations were made on the Local Plan – Consultation on Main Issues document. The representations covered a wide range of planning issues and policy areas. These included the spatial or borough development strategy, urban design and conservation, housing, employment, retail and town centres, community facilities, environment and transport. In addition, 4 responses were received on the Sustainability

[1] This is a summary of the key stages as prescribed by The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

Appraisal Scoping Report and 7 responses on the Infrastructure Delivery Plan Framework Document.

2.1.4. The council has prepared a Regulation 18 Consultation Statement: Report on the Consultation on Main Issues (March 2020). This should be referred for further details about the initial Regulation 18 consultation including information about the consultation process and outcomes.

2.2 Gypsy and Traveller Sites Local Plan

2.2.1. The council previously committed to the production of a single-issue local plan to address identified local needs for gypsy and traveller accommodation. This was reflected in the adopted LDS including the LDS 2018. Several public consultations were undertaken to inform the preparation of a Gypsy and Traveller Sites Local Plan. Through the review of the LDS and publication of the LDS 2020, the council confirmed that it would cease production of this document and that policies regarding gypsy and traveller accommodation would instead be addressed through the Local Plan review.

2.2.2. Several public consultations were undertaken to inform the preparation of the Gypsy and Traveller Sites Local Plan, prior to its cessation. Further information on each is set out below:

- **Site Selection Process: Regulation 18 Stage 1 consultation (March/April 2016).** In March and April 2016 the council carried out a public consultation on draft parameters and criteria for the site selection process as well as a Scoping Report for the Integrated Impact Assessment. In July 2016, Lewisham's Mayor and Cabinet approved the final parameters and criteria (taking account of the consultation comments received).

- **Site Selection Process: Regulation 18 Stage 2 consultation (September/October 2016).** In October and November 2016 the council carried out a public consultation on two potential sites to accommodate gypsy and travellers as well as an Integrated Impact Assessment.

- **Preferred Site: Regulation 18 Stage 3 consultation (September to November 2018).** In September to November 2018 the council carried out a public consultation on a preferred site for gypsy and traveller accommodation (Pool Court) as well as an Integrated Impact Assessment.

2.2.3. Further information on the early stage preparation of the Gypsy and Traveller Sites Local Plan is available on the council's planning webpage. This includes the consultation documents, relevant Regulation 18 Consultation Statements and evidence base documents.

2.3 Call for Sites Exercises

2.3.1. The Local Plan includes site allocation policies. These are policies that establish land use principles and development guidelines for specific sites. Site allocations are strategic development sites which are integral to the delivery of the spatial strategy for the Borough. For example, they make provision for new housing, business space, community facilities or other infrastructure. Site allocations are in most cases larger sites of 0.25 hectares or greater in size.

2.3.2. To assist with the identification of sites to be included in the Local Plan, the council carried out several 'Call for Sites' exercises. These provided the public (including landowners and developers) with the opportunity to identify land that might be available for different types of development within the Borough. The public was invited to complete and submit a response form to the council setting out details of potential sites.

2.3.3. The council carried out its first Call for Sites exercise from 19th May to 30th June 2015. This was held prior to the initial Regulation 18 Consultation on Main Issues document. A total of 22 respondents submitted feedback in relation to 46 sites within the Borough.

2.3.4. The council carried out a second Call for Sites exercise from 19th September to 1st November 2018. This was held prior to the Regulation 18 consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document. A total of 27 respondents submitted feedback in relation to 39 sites within the Borough. The Call for Sites was advertised on the council's Citizen Space consultation platform. Contacts on the council's consultation database were also notified by email.

2.3.5. Following these Call for Sites exercises the council carried out a Landowner Site Survey from 29th August to 11th October in 2019. This was a targeted engagement with landowners of selected sites which were being considered for site allocations. This included sites where there were no extant planning consents. Through this engagement officers sought to understand whether sites were deliverable and developable within the plan period. The engagement provided landowners with the opportunity to discuss their future aspirations for sites and where relevant, likely timescales for delivery of site redevelopment in the future.

2.3.6. The council carried out a third Call for Sites exercise alongside the Regulation 18 consultation on the Local Plan: Main Issues and Preferred Approaches. This was held from 15th January to April 11th 2021. A total of 14 respondents submitted representations in relation to 16 sites. Information on the Call for Sites and site submission forms were provided on the Commonplace consultation platform.

2.3.7. For the third Call for Sites, it is noted that 2 of the submissions related to individual plots of land located within proposed site allocations identified in the Regulation 18 draft Local Plan (Lewisham Shopping Centre and Stanton Square LSIS). In addition, 2 of the submissions were for sites located adjacent to proposed site allocations and the council considered it

appropriate that these be absorbed into the respective allocations. The council did not consider it appropriate to assess the remaining 12 sites and for potential inclusion in the Regulation 19 plan. This is because the public would not have sufficient opportunity to comment on any site proposals. Furthermore, since the Regulation 18 consultation the council reviewed the site portfolio and considered there were sufficient sites to meet identified needs, including for housing and business space. These latest site submissions will be considered in a subsequent Local Plan review.

2.3.8. In addition to its own Call for Sites exercises the council collaborated with the Greater London Authority (GLA) on the preparation of the London-wide Strategic Housing Land Availability Assessment (SHLAA) 2017. The SHLAA was used to inform the preparation of the London Plan (2021) including the setting of the borough-level housing targets. The GLA carried out a Call for Sites exercise to inform the SHLAA which the council assisted in advertising. A total of 23 respondents from landowners and interested parties submitted responses to the GLA for 51 sites in Lewisham.

2.3.9. Sites submitted through council's Call for Sites and the London-wide SHLAA have been considered for inclusion in the Local Plan. The council has published a Site Allocations Background Paper. This should be referred for further information on the council's Strategic Housing Land Availability Assessment and site screening procedures and outcomes.

2.4 Evidence base documents

2.4.1. There is no statutory requirement for the council to consult on evidence base documents during the preparation of the Local Plan. However it has carried out consultation on a number of evidence base documents as part of its approach to early and effective engagement with the local community and other stakeholders during the plan process. The following documents have underpinned considerations for the spatial strategy and area-based policies in the Local Plan.

Lewisham Characterisation Study

2.4.2. The Lewisham Characterisation Study is one of the key evidence base documents informing the Local Plan. The study includes an analysis of the physical form of the borough, its history, places, streets, and buildings. The study helps to identify the key attributes of Lewisham's local character, how this character varies across the borough, and how this local distinctiveness might inform future approaches to managing growth and development.

2.4.3. The council carried out a public consultation on the on the draft Lewisham Characterisation Study from 25th March to 23rd April 2019. The consultation included several engagement events with stakeholders, including local residents and community groups. Consultation feedback helped to shape the content of this study, which also informed the direction of the Local Plan particularly the spatial strategy and sub-area objectives.

2.4.4. Further information on the consultation process and outcomes are set out in the Consultation Report - Lewisham Characterisation Study (June 2019).

Catford Town Centre Framework

2.4.5. The Catford Town Centre Framework is a key evidence base document informing the Local Plan and has been adopted by the council. The framework sets out a high-level placemaking vision for Catford Major Centre to support its regeneration and revitalisation. The Framework includes principles to guide development within the wider town centre area and on specific sites.

2.4.6. The Catford Town Centre Framework was informed by extensive community engagement and consultation. A dedicated engagement team (Team Catford) led this process. The final Framework was shaped by over 3,000 comments provided by a wide range of stakeholders including local residents, community groups and businesses.

2.4.7. Further information on the consultation process and outcomes are set out in the Consultation Statement - Draft Catford Town Centre Framework (April 2021).

New Cross Area Framework and Station Opportunity Study

2.4.8. The New Cross Area Framework and Station Opportunity Study (NXAF + SOS) is a key evidence base document informing the Local Plan and has been adopted the council.

2.4.9. The Area Framework covers an area of approximately 1 kilometre radius around New Cross Gate station. It analyses the existing character of the area and establishes a vision for its future development. It also illustrates opportunities for growth within a network of new and improved public transport connections, as well as walking routes and cycleways.

2.4.10. The Station Opportunity Study explores how a Bakerloo Line Station at New Cross Gate can complement the vision for New Cross. It includes an assessment of the optimal capacity and nature of development around the station, with a view to informing the new Local Plan. Opportunities to significantly improve the quality of the public realm and the environment of New Cross Road are also identified.

2.4.11. Public consultation was an integral part of the preparation of the NXAF + SOS. Consultation was organised around a number of key stages. The consultation programme included workshops, site visits, public drop-in events, presentations, exhibitions, library notices, and online consultations.

2.4.12. Further information on the consultation process and outcomes is set out in Chapter 7.2 of the NXAF + SOS.

A21 Development Framework

2.4.13. The A21 Development Framework is a key evidence base document informing the Local Plan and has been adopted by the council. It provides a strategy for the A21 corridor and the surrounding area. It includes parameters and guidelines for new development in terms of land uses,

massing and layout with an emphasis on the area's local and historic character. The Framework also provides a direction for future public realm and transport improvements.

2.4.14. The study area for the A21 Development Framework includes all of the A21 road that lies within Lewisham - stretching from Lewisham Major Centre to the borough boundary with Bromley in the south. In order to avoid duplication and any potential confusion the Framework does not provide guidance for areas covered by the Catford Town Centre Framework (2021) or Lewisham Town Centre Local Plan (2014). Lewisham Hospital and Lewisham Shopping Centre are also excluded from the scope of this study.

2.4.15. The preparation of the document was informed by pre-production engagement. The council also carried out a public consultation on a draft A21 Development Framework from 14th October to 12th November 2021. Over 300 comments were received from 30 respondents.

2.4.16. Further details on the consultation process and outcomes are set out in the Mayor and Cabinet reports from the meeting of 9th March 2022 along with the A21 Development Framework - Consultation Comments and Responses Log.

Topic based studies: Tall buildings and Open Spaces

2.4.17. The council consulted on studies for the selected policy topic areas of tall buildings, open spaces and on selected nature conservation sites. This was in response to the significant amount of public interest in these areas. The consultations were held following the Regulation 18 consultation carried out from January to April 2021. Further details are set out in Section 2.8 of this Consultation Statement.

2.5 Infrastructure Delivery Plan

2.5.1. The Infrastructure Delivery Plan (IDP) is a document that has been prepared to both inform and support the delivery of the Local Plan. The IDP identifies the different types of infrastructure that will be required to support the levels of growth planned within the Borough over the long-term. It will be critical to ensuring that there is appropriate provision of facilities, services and infrastructure to support sustainable development in Lewisham. The IDP is intended to be treated as a 'live' document and will be periodically reviewed and updated over time.

2.5.2. At the early stage of the Local Plan review the council prepared an Infrastructure Delivery Plan - Framework Document. This was subject to public consultation alongside the Regulation 18 Local Plan Main Issues document from 9th October to 20th November 2015. (See also Section 2.1).

2.5.3. Informed by the Framework Document, a draft IDP was prepared to support the Regulation 18 public consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document. The consultation was carried out from 15th January to April 11th 2021. The majority of work on the draft IDP took place between quarter four of 2018 and quarter four of 2019. It was

informed by the latest available studies, council service strategies, and early-stage feedback from infrastructure providers and delivery partners.

2.5.4. Subsequent to the Regulation 18 stage consultation, the draft IDP was reviewed and updated to include the latest population projections prepared by the Greater London Authority. The council then re-issued the draft IDP in November 2021 to internal and external stakeholders for their review. This provided them with an opportunity to consider the revised population projections and implications for infrastructure requirements. Following this, officers continued to engage with stakeholders to update the document where necessary. In addition, officers presented the draft IDP to Lewisham's Sustainable Development Select Committee at its meeting of 17th February 2022. The IDP has been updated taking account of feedback received from these latest rounds of stakeholder consultation and engagement.

2.6 Member briefings and committee meetings

2.6.1. Planning officers have engaged with the council's elected Members throughout the plan-making process. Members have been provided with opportunities to influence the scope and direction of the new Local Plan along with its detailed policies. Officers have engaged with Members formally through the key decision process and at committee meetings, and also informally for example, through Member queries or meetings.

2.6.2. During the early stages of the plan-making process officers facilitated a series of All Member Briefing Sessions. These sessions focussed on the main topic areas to be covered by the Local Plan. There were 5 sessions held in total with 2 in July 2018 and 1 in each of October 2018, July 2019, and February 2020. An overview of the sessions is provided below:

- Session 1 (July 2018). Introduction to the plan-making process and some of the key challenges and opportunities arising through the Local Plan review.

- Session 2 (July 2018). Discussion on the direction of travel for the new Local Plan and potential options for the spatial strategy.

- Session 3 (October 2018). Agreement of strategic objectives for the new Local Plan with Members and discussion around the emerging spatial strategy for the Borough.

- Session 4 (July 2019). An overview of the draft development management policies and the draft site portfolio (i.e. potential site allocations). A package of information was circulated to all Members both before and after the session. Officers invited feedback from Members between 12th July and 18th December 2019.

- Session 5 (February 2020). Presentation and discussion on the proposed 'Vision for Lewisham' along with the supporting visions and key priorities for the Borough's five-character areas.

2.6.3. Feedback received during the All Member Briefing Sessions helped to inform the preparation of the Local Plan.

2.6.4. In addition to the All Member Briefing Sessions officers have engaged with Members at committee and other meetings including:

- Sustainable Development Select Committee – Officers periodically attended Committee meetings throughout the plan preparation process. This included updates on the plan programme, discuss key priorities for the new Local Plan and to present findings of evidence base documents.
- Strategic Planning Committee - Officers facilitated an information session on 20th October 2021. This included updates on the local plan programme along with a presentation and discussion on policy proposals for key policy areas flagged by the Committee. These included affordable housing, development design, building heights and green infrastructure.
- Housing Retrofit Task and Finish Group – Officers met with Members of this group on 5th October 2021 to discuss how the Local Plan could better recognise and address opportunities around the sustainable retrofitting of buildings.

2.7 Regulation 18 consultation on the Main Issues and Preferred Approaches

2.7.1. The council carried out a Regulation 18 public consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document and supporting materials from January 15th to April 11th 2021. The documents were as follows:

- Lewisham Local Plan: Main Issues and Preferred Approaches
- Proposed Changes to the Adopted Policies Map
- Interim Integrated Impact Assessment (IIA) and IIA Non-Technical Summary
- Draft Habitats Regulations Assessment
- Draft Infrastructure Delivery Plan

2.7.2. The consultation provided the public with an opportunity to comment on the scope of the Local Plan, the key issues to be addressed by it and the council's preferred policy approaches. The public was also invited to comment on other policy options identified by the council (i.e. the 'reasonable alternatives') and to suggest additional policy options for consideration as work on the plan progressed.

2.7.3. Part 3, Part 4 and Part 5 of this Consultation Statement set out further details on the consultation process and outcomes, including information about how consultation feedback informed the preparation of the Regulation 19 Local Plan: Proposed Submission document.

2.8 Post Regulation 18 consultation

Seldom heard and hard to reach groups

2.8.1. During the Regulation 18 consultation, the council used a strategy to raise awareness about the local plan and engage with seldom heard and hard-to-reach groups, including Black and Minority Ethnic (BAME) communities. Despite these efforts the response rate from these groups was comparatively low. The council therefore carried out additional targeted engagement following the Regulation 18 consultation on the draft Local Plan. Further details are set out in **Section 4.5** of this Consultation Statement.

Evidence base documents

2.8.2. Throughout the plan-making process there was a significant amount of public interest in the policy areas of building heights (particularly tall buildings) and green infrastructure (including parks, open spaces and nature sites). This is reflected in the consultation response summary set out in Section 5 of this report. Informed by consultation feedback the council commissioned additional evidence base studies following the Regulation 18 consultation.

2.8.3. The council published a Tall Buildings Study Addendum and Open Spaces Review for the public to review and comment. The consultation materials were made available on the council's main consultation hub, Citizen Space. The consultation on both studies ran from 16th May to 17th June 2022. These were focussed consultations inviting the public to comment on:

- Technical information or evidence that should be considered to inform the studies; and
- Factual errors or omissions.

2.8.4. The studies were used to inform the Regulation 19 Local Plan: Proposed Submission document.

3 How we consulted

3.1 Background

3.1.1. The Lewisham Statement of Community Involvement (SCI) (2006) and Addendum (2020) provides information on how the council will foster greater understanding of the planning process and ensure that the public has opportunities engage in local planning decisions. The SCI sets out when, how and who the council will consult during the plan making process and how the consultation results will be considered.

3.1.2. The council seeks to ensure that effective and inclusive consultation with local residents, community groups and other stakeholders is undertaken.

Whilst meeting its statutory obligations the council tailors public consultation using the tools available to it, taking into account:

- The nature and scope of a policy or guidance document;
- The nature and scale of a development proposal;
- Who the consultation is aimed at; and
- Resources available.

3.1.3. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) set out the minimum statutory requirements for public consultation during the plan-making process.

3.2 Consultation and the Covid-19 pandemic

3.2.1. The Covid-19 pandemic has introduced challenges to the plan-making process. This is particularly around the undertaking of public consultation, including when Government social distancing guidelines are in place. For example, restrictions have made it difficult for local authorities to carry out traditional methods of consultation such as face-to-face public meetings and events. However, national planning guidance and legislation have been updated during the pandemic in response to this situation.

3.2.2. Planning guidance published on 13 May 2020 by the former Ministry of Housing, Communities and Local Government (now the Department of Levelling Housing and Communities) encouraged local planning authorities to assess their SCI to identify which policies were inconsistent with the Government's social distancing guidelines. The guidance also provided that authorities should introduce temporary amendments necessary to allow plan-making to progress, and that continue to promote effective community engagement by means which are reasonably practicable. The use of modern technologies including internet or online platforms was strongly encouraged.

3.2.3. The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020 were introduced in response to Covid-19. These regulations made temporary changes to how documents were required to be made available to the public during the plan preparation and consultation process. Specifically, they temporarily removed the requirement for the council to: make documents available for public inspection at its principal office and at other places it considers appropriate; and provide hard copies of specified documents.

3.2.4. In response to changes in legislation along with national planning policy and guidance, the council amended its Statement of Community Involvement (SCI) in December 2020 by way of an Addendum. The changes to the SCI better enabled the council to progress the preparation of the local plan during the pandemic, with greater flexibility for the use of consultation tools.

3.3 Consultation tools used

3.3.1. The council's SCI provides information on the different tools that can be used to support public consultation on local plan documents. Table 3.1 below provides a summary of the tools used for the Regulation 18 consultation on the Local Plan: Main Issues and Preferred Approaches document and supporting materials.

3.3.2. The Regulation 18 consultation was open from 15th January to 11th April 2021. This period was significantly longer than the statutory minimum 6-weeks. The council invited the public to make formal representations using their preferred choice of the following options:

- Online via Commonplace, the Council's (externally hosted) online consultation webpage for the Local Plan at: https://lewishamlocalplan.commonplace.is/
- By email to the Council's dedicated Local Plan email address at: localplan@lewisham.gov.uk
- By post to the Council's main office at: Laurence House, 1 Catford Rd, Catford, London, SE6 4RU

3.3.3. The vast majority of representations were duly submitted on time. Whilst some late representations were made these were accepted and given full consideration by officers.

Table 3.1 Regulation 18 consultation on Lewisham Local Plan: Main Issues and Preferred Approaches document and supporting materials

Statement of Community Involvement – tools available	Tools used	Reasons for tools not used
Physical copies of documents	No	To comply with Covid-19 social distancing guidelines
Lewisham council Website	Yes	-
Social media platforms	Yes	-
Posters and leaflets	Yes	-
Public notices / press releases	Yes	-
Email and post correspondence	Yes	-
Public meetings (on-site)	No	To comply with Covid-19 social distancing guidelines
Public exhibitions and drop-ins	No	To comply with Covid-19 social distancing guidelines
Internal consultation with elected Members/Service Areas	Yes	-
Other digital tools and telephone	Yes	-
Online consultation and engagement platforms	Yes	-

3.3.4. Further details on each of the tools is set out below. Documentary evidence of the consultation tools is included in the Appendix 1 of this Consultation Statement.

Physical copies of documents

3.3.5. Lewisham council's main office and other buildings were closed to the general public throughout the Regulation 18 consultation in accordance with the Government's social distancing guidelines. Therefore, physical copies of documents were not made available for public inspection as they normally would.

Lewisham council website

3.3.6. The consultation was supported by a dedicated webpage on the Council's website, accessed from the Planning webpages. This contained information on the draft Local Plan, how to inspect the consultation documents and submit representations.

3.3.7. There was an additional webpage on the Council's website (Citizen Space consultation platform) providing information on draft Local Plan, links to the externally hosted Commonplace consultation platform.

3.3.8. Citizen Space was also used as a registration portal for all of the Local Plan online information events. These were facilitated using the 'Zoom' video conferencing platform. There were 16 events in total with 492 registered participants. Further information on the sessions is set out in paragraph 3.3.28 below.

Social media platforms

3.3.9. The council's social media platforms were used to raise awareness of the Local Plan and to promote the consultation. Facebook and Twitter were used throughout the consultation period to advertise online consultation events and provide links to information, including the 'Commonplace' consultation hub. A dedicated YouTube channel for the Local Plan was also created. This was used to host videos of online consultation events, enabling people to view the sessions after they had taken place.

Posters and leaflets

3.3.10. Leaflets were used to raise awareness of the Local Plan and to promote the consultation. Leaflets were prepared for each of the 'character sub-areas' of the borough identified in the plan. These provided information about the areas and some of the key proposals for them. The leaflets were made available on the Commonplace online consultation hub. Officers also engaged with local community groups to ask for their assistance in promoting the consultation and circulating the leaflets to their networks.

3.3.11. A Summary Version of the Local Plan was made available to download from the Commonplace online consultation hub. This set out a short format plain English version of the Local Plan: Main Issues and Preferred Approaches

document. It was prepared to help those unfamiliar with planning to engage in the consultation.

Public notices and press

3.3.12. The council issued public notices to raise awareness about the Regulation 18 consultation. These notices included:

- Public notice in the News Shopper newspaper, including both the hard copy and digital (on-line) versions.
- A notice and article in the Spring edition of Lewisham Life, a magazine which is circulated to all households in Lewisham borough, approximately 116,000 households.
- Public notice included the Lewisham council's Residents Newsletter – this newsletter is a weekly circular which is e-mailed out to approximately 28,000 Lewisham residents.
- Public notices placed within or around sites included as proposed site allocations in the Local Plan: Main Issues and Preferred Approaches document.

3.3.13. There was also a series of new articles in the News Shopper newspaper, which broadly covers South East London and Kent. These articles discussed proposals for each of the character areas included in the Local Plan: Main Issues and Preferred Approaches document. The articles were not prepared or issued by the council but were nonetheless helpful in raising awareness about the consultation.

Email and post correspondence

3.3.14. Formal letters were emailed to contacts on the council's Local Plan 'consultation database' to notify them about the Regulation 18 consultation on the Main Issues and Preferred Approaches document and supporting materials.

3.3.15. Letters were also sent by post to landowners and leaseholders of sites proposed to be included as site allocations in the draft Local Plan. The letters notified relevant parties about the Local Plan consultation and opportunities to make representations. Addresses and contact details of landowners and leaseholders were acquired through Land Registry searches and the council's planning records. Letters were sent to stakeholders with land interests for the majority of site allocations. However in a limited number instances letters were not sent for the following reasons:

- Land was in council ownership and therefore notification was unnecessary and/or the council had or was in the process of engaging with leaseholders on its landholdings about future redevelopment proposals
- Significant delays encountered in acquiring information owing to General Data Protection Regulation (GDPR).

3.3.16. Emails or ‘push notifications’ were sent out to contacts on the Commonplace online consultation hub. These contacts were individuals who had previously engaged in council consultations (such as the Catford Town Centre Framework and Neighbourhood Community Infrastructure Levy) and consented to being notified about future consultations.

3.3.17. A dedicated Local Plan email address was set up and public were invited to email the planning policy team for further information about the consultation and to submit consultation responses if they preferred this format.

Post Regulation 18 consultation correspondence

3.3.18. Additional emails were sent to the prescribed ‘specific consultation bodies’ (i.e. statutory consultees) who did not submit representations on the Regulation 18 consultation on the Main Issues and Preferred Approaches document. An extension period of 4 weeks was given to these consultees to submit comments.

3.3.19. Copies of the letters sent for the original and extended consultation are attached in Appendix 1 of this Consultation Statement.

Public meetings, exhibitions and drop-in events

3.3.20. Officers were unable to facilitate face-to-face public meetings, exhibitions and drop-in events due to the Government’s social distancing guidelines in place during the public consultation. However, a series of online information sessions were held as an alternative. This is discussed further below.

Internal consultation with elected Members and Service Areas

3.3.21. Officers engaged with elected Members throughout the early stages of the plan-making process. Further details are set out in this Consultation Statement – see Section 2, under sub-heading Member briefings and committee meetings.

3.3.22. Planning officers collaborated with officers in other council Service Areas throughout the early stages of the plan-making process. This included joint-commissioning and preparation of evidence base documents, policy preparation and review.

Other digital tools and telephone correspondence

3.3.23. Contact details for the council’s Planning Service were made available to the public, including the Local Plan team email address and telephone. Regular correspondence was made throughout and following the Regulation 18 consultation with interested parties. This included emails, telephone calls and video-conferencing with landowners and developers.

Online consultation and engagement platforms

<u>Commonplace consultation hub</u>

3.3.24. The council set up a dedicated online consultation hub for the Local Plan using the ‘Commonplace’ platform. Commonplace is hosted externally and

does not comprise part of the council's own website. However, the council's planning and consultation webpages provided links to the Commonplace site and encouraged the public to visit it.

3.3.25. Commonplace was employed because of its functionality and ease of use, whether by mobile device, laptop or desktop computer. It is graphically engaging and allows users to easily navigate through consultation materials and submit responses. It also features a 'latest news' function which enables the council to advise registered users of updates, for example, of consultation activities. In addition, the council had successfully hosted public consultation events using Commonplace prior to the Local Plan consultation.

3.3.26. The Local Plan: Main Issues and Preferred Approaches document and supporting materials were all made available on the Commonplace site throughout the consultation. The website also provided supporting information such as links to the Local Plan evidence base webpage and details of online information sessions.

3.3.27. Commonplace mapping tool – pin drops, etc. different way of engaging in process and to make views known about local areas

Online information sessions

3.3.28. Officers facilitated a series of online information sessions using the 'Zoom' video conferencing platform. These were held in February and March 2021 during the consultation period. The sessions were promoted on the council's social media platforms, council webpages and the Commonplace site. The sessions were open to all members of the public with registration arranged via the council's main consultation webpage (Citizen Space).

3.3.29. There were 16 sessions in total covering different policy areas in the Local Plan. In response to the significant amount of interest in the 'character sub-areas' there were 2 sessions held for each. Overall, the sessions were attended by 492 participants. The sessions were recorded and uploaded to the Local Plan YouTube webpage.

3.3.30. Each session included a 'Question and Answer' period. Due to time constraints or need for clarifications, not all questions could not be answered at the sessions. However, officers provided written responses to all unanswered questions. These were uploaded to the Commonplace site following the sessions.

3.3.31. The breakdown of sessions is set out below.

- 4th February - Vision and strategy
- 9th February - Design and heritage
- 11th February - Economy and culture
- 16th February - Green infrastructure and environment
- 17th February - Housing
- 23rd February - Community and transport Infrastructure
- 1st March - Central area
- 2nd March - North area

- 4th March - East area
- 8th March - South area
- 9th March - West area
- 11th March - Central area
- 15th March - North area
- 16th March - East area
- 17th March - South area
- 18th March - West area

4 Who we consulted

4.1 Background

4.1.1. This section of the report provides information on who the council consulted during the Regulation 18 consultation on the Local Plan: Main Issues and Preferred Approaches document.

4.2 Consultation database

4.2.1. Lewisham council's Planning Service maintains a database of individuals and organisation who wish to be contacted about the preparation of the Local Plan and other policy documents. The database is an important tool used to engage with a wide range of stakeholders and to ensure they are kept informed of consultation opportunities. All personal data gathered for the database complies with the Data Protection Act 1998.

4.2.2. The database has been regularly updated to ensure that all information held complies with the Act. Furthermore, the database has been reviewed to meet the quality standards of the European data protection law, the General Data Protection Regulation (GDPR), which came into effect on the 25th of May 2018. To ensure compliance, Lewisham's Planning Policy team notified everyone on the council's database providing an explanation on the need to update personal data and giving everyone the option to opt-in or out. The council sent several emails to everyone on the database, and information was provided on the changes and implications of the new Act. The responses received were stored as verifiable to allow for audit and to show how the council compliance with the GDPR requirements. In total, about 400 out of 4000 individuals and organisations responded, giving consent to remain on the council's database. This had a significant impact on the council's ability to raise awareness about the Local Plan, and efforts have since been made to increase the number of contacts on the database.

4.2.3. All personal data of those who did not respond and those who requested to opt-out have been permanently removed from the council's database. Therefore, the Council has not been in a position to notify these individuals or organisations about progress on the preparation of the Local Plan,

including those who may have submitted representations at the Regulation 18 stage in 2015. The council's database has been constantly updated to ensure compliance with GDPR requirements.

4.3 Prescribed consultation bodies

4.3.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) prescribe the bodies that must be consulted during the preparation of a Local Plan. These include 'specific consultation bodies' and 'general consultation bodies'. The relevant bodies for Lewisham are set out in the council's adopted Statement of Community Involvement.

4.3.2. The specific consultation bodies (also commonly referred to as 'statutory consultees') include:

- The Mayor of London
- Adjoining authorities (London boroughs): Bromley, Royal Borough of Greenwich, Southwark, Tower Hamlets
- The Coal Authority
- Environment Agency
- Historic England
- Natural England
- Marine Management Organisation
- Network Rail
- Highways England
- Transport for London
- NHS London / Clinical Commissioning Groups
- Homes England and Regulator of Social Housing
- Thames Water
- Electronic communications operators (e.g. telephone, mobile, broadband)
- Gas and electricity operators

4.3.3. The general consultation bodies include bodies which represent the interests of:

- Voluntary bodies some or all of whose activities benefit any part of the Borough, including Neighbourhood Forums and Amenity Societies
- Different racial, ethnic or national groups in the Borough
- Different religious / faith groups in the Borough
- Disabled persons in the Borough
- Persons carrying on business in the Borough
- Different age groups in the Borough
- Different equalities groups

4.4 Duty to Cooperate

4.4.1. The Duty to Cooperate was introduced by the Localism Act 2011, and is set out in section 33A of the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities in England and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of a local plan. For Lewisham, the Duty to Cooperate bodies include:

- Environment Agency
- Historic England
- Natural England;
- Mayor of London
- Civil Aviation Authority
- Homes England and Regulator of Social Housing2
- Clinical Commissioning Groups established under the National Health Service Act 2006
- Office of Rail Regulation
- Transport for London
- Highways England
- Marine Management Organisation
- Adjoining authorities (London boroughs)

4.4.2. The council has fulfilled its Duty to Cooperate throughout the plan-making process. This includes formal consultation at the Regulation 18 stage as well as continuous and ongoing engagement with stakeholders. This includes work on the preparation of evidence base documents, the Infrastructure Delivery Plan (IDP) and early stage review and feedback of the draft Local Plan.

4.4.3. The council has prepared a separate Duty to Cooperate Statement, which should be referred for further details.

4.5 Seldom heard and hard to reach groups

4.5.1. For the Regulation 18 consultation on the Local Plan: Main Issues and Preferred Approaches, a targeted outreach strategy was used for ‘seldom heard’ communities and hard-to-reach groups, including Black and Minority Ethnic (BAME) communities. The strategy was developed by communications consultants working with council officers. As part of this strategy a contact list of 219 key stakeholder organisations within the Borough was identified. Officers emailed these organisations and requested support in promoting the consultation to their wider network as well as encouraging members to attend consultation events and comment on the Local Plan consultation.

4.5.2. A package of promotional documents was sent the organisations to assist them in promoting the consultation. This included summary leaflets for the Local Plan 'character area' policies, shareable graphics, links to the Commonplace consultation website and information about how to get involved. Officers requested that the organisations circulate information using their social media accounts, e-mail contact lists and any virtual newsletters due to be published during the consultation period.

4.5.3. Despite this strategy and approach to engage the with seldom heard and hard-to-reach groups, the response rate was low as evidenced by the disproportionately low proportion of Commonplace engagements made by individuals identifying as BAME.

4.5.4. The council therefore commissioned consultants to carry out an additional programme of targeted consultation with seldom heard and hard-to-reach groups. This was undertaken following the Regulation 18 consultation. The project team facilitated 10 consultation events. These were held in places of interest around the Borough (as identified by the groups) including one held virtually. Aided by the lifting of Covid-19 social distancing restrictions the team was able to speak with 200 individuals face-to-face, with over 90 survey responses completed. Further information on the process and outcomes of this engagement is set out in **Appendix 5** of this Consultation Statement.

4.5.5. The additional engagement with seldom heard groups was successful in reaching a broader representation of the community. Of those people who engaged in the consultation:

- Ethnic diversity - 58% of consultees were from a Black Caribbean, Black African, mixed or multiple ethnic background or any other White background.
- People with disabilities - 19% of consultees considered themselves to have a disability, with 38% of these describing it as cognitive or learning disability or difficulty.
- LGBTQ+ voices - Almost 15% of respondents identified as LBGTQ+.
- A younger response - 65% of the consultees were under 40s, with 30% under 29 years old, including those under 18, and 35% within 30 and 39 years old.

4.5.6. Feedback from this engagement echoed many of the key themes conveyed by respondents to the Regulation 18 consultation, particularly local residents and community groups. For example, respondents reflected on the need for more genuinely affordable housing, the importance of high quality living environments (including fit-for-purpose housing along with access to parks and open spaces) and issues around public transport access and frequency of services. The engagement also helped to draw attention to key areas of interest and/or concern amongst the respondents. These included community cohesion, security and perceptions of safety, and design of the built environment especially the public realm.

Voices for Lewisham review

4.5.7. Whilst it cannot be considered as part of the statutory consultation process of the Local Plan, officers are acutely aware of the importance of the feedback from the Voices of Lewisham work undertaken by the Council during the COVID-19 Pandemic. A key thread from this work was economic recovery, the creation and investment in new local jobs, community space and housing. Officers have reviewed this work to inform the Local Plan.

4.6 Consultation responses

4.6.1. The Regulation 18 consultation process had substantial engagement from residents, community groups, business, and stakeholders. Feedback was received from over 1,400 respondents with several thousand comments in total. This represents a successful local plan response rate when compared to other London borough's local plan consultations both prior to and during the Covid-19 pandemic. The consultation responses included:

<u>Commonplace main site</u>

- Visitors 13,001
- Respondents 937
- Agreements with comments 2,307

<u>Commonplace interactive map</u>

- Visitors 1,870
- Comments 577
- Agreements on specific comments 2,061

<u>Local Plan inbox – written representation</u>

- Respondents 450

<u>Online "town hall" events</u>

- Total attendance 492

5 Main issues raised and how consultation feedback was considered

5.1 Background

5.1.1. This section provides a summary of the main issues raised during the Regulation 18 consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document and supporting materials. It also sets out

how council officer considered these responses. The section helps to illustrate how feedback was used to inform the preparation of the plan.

5.1.2. The main issues raised through the consultation are set out in the tables below. These are organised around each of the main parts and sections of the draft Local Plan. The tables focus on policy areas or matters where there were significant concerns or issues raised with the scope of the draft Local Plan and its preferred policy approaches. The tables are not intended to cover areas where there was general agreement or support.

5.1.3. The tables in Section 5 of this Consultation Statement do not capture all of the issues raised or changes made in response to representations. For example, feedback and responses on specific site allocation proposals are not included in the tables. Full details of the representations and officer responses are set out in Appendices 2, 3 and 4 of this Consultation Statement.

Representations not recorded

5.1.4. In a very limited number of cases there were representations submitted that included discriminatory language or inflammatory statements about council officers, the council and other government bodies. Such language and statements are considered by the council to be unacceptable and representations have therefore been removed from the schedules. The representations have been filed for council records should they be required in the future, for example, at the request of the Planning Inspector.

Respondent details

5.1.5. The personal details of individuals making representations have been redacted where necessary in response to the General Data Protection Regulation (GDPR). Respondents will be assigned a unique reference number for the purpose of the consultation records. The council will endeavour to publish the names of community groups, special interest groups, government bodies and other organisations alongside the representations made.

5.2 General comments

Main Issues	Response / action(s)
Public consultation	
View that the public consultation was inadequate and not sufficiently advertised.	The council carried out the public consultation in accordance with its adopted Statement of Community Involvement. The consultation was advertised in a variety of ways including notices in local newspapers and Lewisham Life magazine, site notices, promotion on the council's website and social media accounts. The consultation ran from 15th January to 11th April 2021, a period which is well in excess of the statutory minimum 6-weeks.

View that the public consultation should not have been carried out during Covid-19 as it limited opportunities for engagement.	The Government has set a deadline for all local authorities to have an up-to-date local plan in place by 2023. It is important that plan preparation is not unduly delayed. The Government has also introduced new legislation and guidance to ensure that local authorities can continue preparing plans effectively during the pandemic. Whilst recognising that the Government's social distancing guidelines introduced challenges, the consultation was a successful one both in terms of the number of responses received and the wide range of stakeholders submitting representations.
Local Plan format	
The draft Local Plan is too long and repetitive in parts.	The Local Plan will consolidate 4 documents into a single plan. To support the consultation, a short-format Summary Document was prepared. The plan has been professionally desktop published in a user-friendly format, with navigation aided by embedded links to different sections of the plan. Following the Regulation 18 consultation, the Local Plan has been comprehensively reviewed to make it shorter and more concise, for example, by removing repetition of policies or supporting text.
The draft Local Plan language is too vague (e.g. development proposals should…, or must seek to…, etc.) and could compromise the council's decision making powers.	The Local Plan has been amended to provide more authoritative language where appropriate (e.g. development proposals must…, will be required to…, etc.)
Implementation	
More needs to be done about planning enforcement.	Planning enforcement, whilst a function of Lewisham council's Planning Service, is outside the scope of the Local Plan.
Question as to whether the Local Plan (including its vision and objectives are realistic and deliverable) given the limited resources available to the council and public sector stakeholders, especially as a result of Covid-19.	The council is not solely responsible for delivering the Local Plan. A wide range of public and private sector stakeholders will support the implementation of the plan, both through the delivery of new development and directing investment, for example, to provide new and improved infrastructure and services.

5.3 Part One: Planning for an Open Lewisham

Main Issues	Response / action(s)
Vision and objectives	
The vision is too vague.	The vision is an overarching statement about the type of place Lewisham is and should become in the future. It provides a direction for the Local Plan, which the objectives and policies help give effect to. The council considers the vision is proportionate given the wide range of policy topic matters covered by the plan.
Suggestions for new strategic objectives to be included.	The draft Local Plan strategic objectives were set and agreed by elected Members through All Member workshops. Requests for modifications to the objectives have been considered and additions have been made in response. For example, a new objective around support for green industries in supporting the transition to a low carbon, circular economy.
Spatial strategy	
Question as to whether the growth assumptions underpinning the plan are valid, recognising it was largely prepared prior to peak of Covid-19.	Following the Regulation 18 consultation, additional evidence base documents have been prepared and used to inform the next stages of plan preparation. This evidence includes updated population projections, a new town centre study and Strategic Housing Market Assessment.
View that Lewisham should not be accommodating additional growth and development, especially the levels set out in the plan.	The NPPF requires the council to plan positively to meet objectively assessed needs. Evidence base studies have been commissioned and prepared to identify needs such as for housing, business space, open space and infrastructure. The London Plan also sets a housing target for Lewisham that the Local Plan must deliver.
Clarity sought on what happens if the Bakerloo line extension is delayed or is not delivered within the plan period.	The Local Plan has been amended to make clear that the spatial strategy is not dependent on the BLE. However, the plan will continue to make provisions to secure the BLE and not preclude its future delivery, as well as to maximise development opportunities associated with the BLE.

5.4 Part Two: Managing Development

Main Issues	Response / action(s)
High quality design	
Concerns about the impact	The Local Plan has been informed by the Lewisham

of development in terms of harm to or loss of local character.	Characterisation Study. The draft plan makes clear that all new development must respond positively to local character by following the design-led approach. The plan has been amended to provide clarifications around the need for proposals to address the character of a site and its wider context. The Local Plan is a strategic document and site specific considerations for local character will invariably be considered through the development management process.
The plan does not adequately recognise that character of an area can evolve over time, as set out in the London Plan.	The Local Plan has been amended to reflect that development proposals should respond positively to local character, recognising that the character of some localities may evolve over time in line with the spatial strategy.
The plan needs stronger policies to ensure healthy living environments.	The Local Plan has been amended to include a new policy on Health Impact Assessments, which will be required for certain types of development proposals, including major developments. The policies on amenity have also been reviewed and strengthened, with links to good practice guidance, such as that prepared by Sport England.
Concerns about approach to building heights. Opposition to tower blocks along with requests for the plan to set limits on heights. Many comments focussed on specific locations, such as Lewisham and Leegate town centres. View that Local Plan must provide further details about areas which are suitable for tall buildings and acceptable building heights.	The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs Local Plans to identify locations that may be suitable for tall buildings and to set parameters for building heights. Following the Regulation 18 consultation, a Tall Buildings Study Addendum was prepared and issued for public consultation. The Local Plan buildings heights policy has been amended taking into account the study findings.
Concerns about the loss of garden land.	The draft Local Plan clearly sets out that garden land will be protected from inappropriate development. However there are permitted development rights which enable residential extensions of a certain size. The policy on ‘infill and backland sites, garden land and amenity areas’ has been updated to include a reference to the council’s adopted Small Sites SPD, which will support policy implementation.
Suggestion for additional local views to be	The Local Plan is considered to be in conformity with the London Plan’s London View Management Framework. Local Views were reviewed through the

designated.	preparation of the Lewisham Characterisation Study, which was subject to public consultation.
The plan needs to provide more detail around inclusive design.	The Local Plan has been amended to refer to the National Design Code along with additional requirements around tenure integration and tenure neutral design. A new requirement for proposals to submit an Inclusive Design Statement has also been included.
Heritage	
Concerns about the impact of development in terms of harm to or loss of heritage and heritage assets.	The Local Plan has been informed by the Lewisham Characterisation Study, Conservation Area Appraisals and other evidence base documents. The draft Local Plan is considered to be consistent with the NPPF policies on heritage and conservation. Policies have been amended to provide more authoritative language to help ensure developments preserve and enhance the significance of heritage assets and their setting. In addition, following the Regulation 18 consultation a Heritage Assessment has been undertaken on selected major development sites (Deptford and New Cross areas) and findings have been used to inform changes to relevant site allocation policies.
Requests for additional Areas of Special Local Character to be designated or recognised.	Areas of Special Local Character (ASLC) are non-designated heritage assets. The Local Plan included policies dealing with non-designated heritage assets. The plan been amended to make clear how future ASLC will be identified, and which ASLC are currently recognised.
Concerns about the de-designation of the Sydenham Hill Ridge Area of Special Character.	The draft Local Plan proposed to de-designate the Sydenham Hill Ridge as an Area of Special Character and to instead recognise it as an Area of Special Local Character (non-designated heritage asset). It is considered that this recognition in combination with other policies, such as view management, will ensure protection for the distinctive character of this area. The Local Plan Schedules have been amended to make clear the Ridge is recognised an ASLC.
It is inappropriate to include a policy on enabling development, as enabling development is by definition contrary to the development plan.	The standalone policy on enabling development has been deleted from the Local Plan. However a policy criterion has been retained to ensure clarity for the public about how relevant proposals will be considered, with links to Historic England guidance.
Housing	

Housing target - references to the Local Housing Need (LHN) figure should be removed.	Following the Regulation 18 consultation, the London Plan has come into force. This provides an up-to-date housing target for Lewisham. The Local Plan has been amended to remove references to the Government's LHN figure and makes clear the London Plan housing target for Lewisham is the strategic housing requirement.
General support for affordable housing policies and 50% target. However doubts that new housing will be affordable to local people – monitoring shows current 50% target not being met.	The draft Local Plan set out a strategic target for 50% of all new homes to be genuinely affordable housing, with the measure of affordability being linked to local income levels. Following the Regulation 18 consultation an update to the Local Plan Viability Assessment has been undertaken, which demonstrates that the approach is viable. It is noted that the London Plan includes a Viability Tested Route to affordable housing, where a 35% threshold is sufficient to satisfy the policy requirements.
Development viability approach, particularly for affordable housing, should be amended.	In terms of development viability, the draft Local Plan has been amended to refer to the 'Existing Use Value Premium' approach as a benchmark for establishing the existing use value of land, in line with regional and national planning policy.
View that more family homes are needed not 1 and 2 bedroom flats.	The draft Local Plan seeks to make provision for family homes. The plan states that development proposals must make provision for an appropriate mix of housing types. It also includes policies to prevent the loss of family homes through residential conversions. The Local Plan has been amended to include a target housing size mix for affordable housing, which will clarify expectations for the delivery of affordable family units on new developments.
Local plan must set a 10-year target for gypsy and traveller accommodation as per London Plan. Some opposition to proposed new gypsy and traveller site at Poole Court.	The Local Plan has been amended to include a 10-year housing target for gypsy and traveller accommodation, informed by local evidence. The council must plan positively to meet local housing needs. It has undertaken assessments of sites through previous work on the Gypsy and Traveller Site Local Plan (which has now been redacted in accordance with the Local Development Scheme), and the preferred site is included in the Local Plan.
The Local Plan is silent on Build to Rent products.	The Local Plan has been amended to include a new policy on Build to Rent.
Concerns about overconcentration of Houses in Multiple	The draft Local Plan included a policy to address the harmful overconcentration of HMOs. The policy has been amended to provide criteria against which

Occupation (HMO).	overconcentration will be assessed, which will aid policy implementation. The council is currently reviewing HMO accommodation and may in the future extend the area of the Article 4 Direction which removes Permitted Development rights for HMOs, however the making of such Directions is outside the scope of the Local Plan.
Economy and culture	
The Local Plan needs to respond to new planning legislation, including changes to the Use Classes Order.	The Local Plan section on economy and culture has been comprehensively reviewed to reflect and respond to changes in planning legislation, including the amended Use Classes Order.
The Local Plan does not reflect Lewisham's role for London's Central Activity Zone (CAZ). This includes the need to support distribution and related logistics land uses, including warehousing.	The Local Plan has been amended to provide support and clearer direction around appropriate locations for warehousing, distribution and logistics. This is in the context of the borough's identified main need for land and space for light industrial uses.
Further clarification required on approach to managing Strategic Industrial Land.	The Local Plan has been amended to provide further details on the approach to the re-configuration of Surrey Canal Road SIL to enable the co-location of employment and other uses
Request for specific land or sites to be identified as suitable for co-location of industrial and other uses.	Where industrial sites have been allocated in the Local Plan for co-location of employment and other uses, these have been based on recommendations set out in the employment land study.
Clarification around industrial capacity and how this is defined.	The Local Plan has been amended to set a clear definition of industrial capacity, in line with the London Plan. This includes the removal of the 'benchmark plot ratio' proposed to calculate capacity.
Question as to whether affordable workspace policies are viable and deliverable.	The requirements for affordable workspace have been reviewed and tested through the Local Plan viability assessment, and updated where appropriate. The Local Plan has also been amended to provide more clarity around where and how affordable workspace will be secured.
Questions about the robustness of retail floorspace needs figures, given impact of Covid-19 and Brexit and acceleration of online shopping.	Following the Regulation 18 consultation, a Town Centre Trends report was prepared which included an updated retail needs assessment and revised floorspace needs. The Local Plan has been amended informed by findings of the report.

Cultural quarters and night-time economy hubs broadly supported however some concerns about impact on local amenity, particularly in the evening and night-time.	The Local Plan includes policies on amenity which will ensure developments and uses do not have an unreasonable adverse impact on local amenity.
Some objections to approach to manage overconcentration of hot food takeaways.	The Local Plan approach to managing hot food takeaways is considered to be in conformity with the London Plan.
Community infrastructure	
Question as to whether sufficient provision is made for community infrastructure required to support growth	The Local Plan has been informed by the Infrastructure Delivery Plan (IDP). The IDP has been prepared in collaboration with service providers and delivery partners. Following the Regulation 18 consultation, the IDP was updated to take account of the Greater London Authority's latest population projections, and the council engaged with stakeholders to review and update the IDP in light of this information. The Local Plan includes development management policies and site allocation requirements to ensure that new developments contribute to and/or are appropriately supported by community infrastructure.
Policies to deal with proposals involving loss of sports facilities and land are not in accordance with the London Plan	The Local Plan has been amended with new policies on sports and recreation to ensure conformity with higher level policies.
Green infrastructure	
View that stronger protections are needed for open space. Clarifications required to distinguish between open and green spaces and the level of protection given to each.	Following the Regulation 18 consultation additional studies have been prepared on green infrastructure They include the Open Spaces Review, MOL Review Update and SINC Surveys. Informed by this evidence, the Local Plan has been amended to set out a hierarchy of open spaces with policies to protect open space commensurate with their place in the hierarchy. This includes a clear distinction between green and open spaces.
Requests for open spaces and nature sites to be designated or de-designated.	Following the Regulation 18 consultation additional studies have been prepared on green infrastructure. They include the Open Spaces Review, MOL Review Update and SINC Surveys. This evidence has informed the setting of land use designations, which will be reflected on the Policies Map. This includes changes made to the Regulation 18 draft

	Local Plan.
The plan does not adequately respond to the Environment Act 2021 especially provisions around Biodiversity Net Gain.	The Local Plan has been amended in response to the Environment Act. This includes policies which set the strategic framework for Local Nature Recovery Networks and more detailed requirements for development proposals to deliver Biodiversity Net Gain.
Request for geodiversity sites to be designated.	The Local Plan has been amended to designate additional geodiversity sties, informed by evidence prepared by the London Mayor and London Geodiversity Partnership.
Sustainable design and infrastructure	
View that Local Plan does not go far enough in responding to climate emergency, including design standards for reducing carbon emissions.	The draft Local Plan policies set out approaches to carbon management and achieving net carbon neutrality, which align with the London Plan. Where more stringent requirements are set locally it must be demonstrated that these will not adversely impact on development viability. The Local Plan Viability Assessment sets out that the approach to carbon management is appropriate and will enable other elements of the plan to be deliverable, such as requirements on affordable housing. In response to feedback, the Local Plan has been amended to include additional policies have been on non-regulated carbon emissions (i.e. those not captured within Building Regulations / embodied carbon).
Differing views on sustainable retrofitting. Some suggest the policies are too onerous and do not provide sufficient consideration of feasibility. Others consider that more detail should be included on this design aspect.	The Local Plan has been amended to provide further details on retrofitting of the existing building stock. Where policies require that certain design ratings are satisfied (e.g. BREEAM), flexibility has been introduced to allow consideration of feasibility on a case-by-case basis. The policy approaches have been tested through the Local Plan Viability Assessment.
View that air quality policies should be strengthened.	The Local Plan has been amended to strengthen policies on air quality, with a requirement that all development proposals must be at least air quality neutral. The plan has also been updated to take account of and better align with the council's latest Air Quality Management Plan.
Opportunities should be taken to strengthen water and flood risk management policies. This includes clearer links to wider sub-regional key plans and	The water management section has been comprehensively reviewed and updated, particularly in response to feedback provided by statutory consultees such as Environment Agency, Thames Water and Port of London Authority.

strategies.	
Clarification is required on approaches to safeguarding waste sites.	The draft Local Plan identified strategic waste sites to be safeguarded in order to meet the borough's London Plan waste apportionment. It is acknowledged there are other waste sites with licenced capacity (i.e. with Environment Agency permits). The Local Plan has been amended to make clear the protection afforded to all such sites, in line with the London Plan.
Transport and connectivity	
Clarification required around the approach to safeguarding land for the Bakerloo line extension.	The Local Plan has been amended to make clear the formal Safeguarding Directions for the BLE issued by the Secretary of State. Clarifications have also been provided around approaches to ensuring development does not prejudice the delivery of the BLE, particularly around Phase 2 where Directions have not been set.
The plan does not adequately respond to the fact that parts of the Borough are poorly served by public transport, and some people rely on cars for access.	The Local Plan helps give effect to the London Mayor's objective for 90% of journeys in inner-London to be made by walking, cycling or public transport. It sets out strategic priorities for securing new and improved transport infrastructure to address local needs. Where development proposals come forward, the policies seek to ensure that the nature, scale and density of development responds to public transport access, and where necessary, is appropriately phased or makes provision for transport improvements.
Varied views on Low Traffic Neighbourhoods.	The Low Traffic Neighbourhoods (LTN) is a scheme that Lewisham and other London councils are piloting to support liveable, healthier neighbourhoods by encouraging modal shift and reducing car use. Whist the Local Plan sets out similar objectives, the LTN scheme itself is outside the scope of the Local Plan, and its future will be considered independently of the plan-process by council's Transport service.
General support for Healthy Streets Approach but more details needed to support walking and cycling.	The Local Plan includes new policies on public realm and the Lewisham Links, which will support the delivery of a network of high quality cycleways and walking routes. The Local Plan has been amended to ensure development proposals comply with the London Cycle Design standards, and to provide clarifications on site allocations for strategic cycleways.
Approaches to car parking are not in conformity with	The Local Plan parking policies have been comprehensively reviewed and updated to ensure

the London Plan.	conformity with the London Plan, including on car-free and car-lite development.

5.5 Part Three: Lewisham's neighbourhoods and places

Main Issues	Response / action(s)
General	
Disagreement over boundaries of neighbourhood areas included in Part 3 of the Local Plan.	The draft Local Plan establishes five neighbourhood character areas as a means to provide a neighbourhood level focus for managing development and directing investment in the Borough. The sub-areas were informed by the Lewisham Characterisation Study which was prepared by the council working with community groups. Whilst acknowledging that there may be disagreements over the geography of these areas, the Local Plan must be read as a whole and it is considered that the sub-area policies will be beneficial in supporting the delivery of the spatial strategy for the borough.
A significant number of responses dealing with matters such as local and historic character development density, building heights, open and green spaces, nature sites, transport and connectivity.	Many of the matters raised concern local issues which have been addressed through changes to the borough-wide policies, including the Part 2 Managing Development section of the Local Plan. The table under subheading 5.5 should therefore be referred.
Site allocations. A significant number of responses dealing with indicative site development capacities, development principles and guidelines for specific sites.	The site allocations have been reviewed and amended where considered necessary. This includes the removal of or changes to site boundaries, amendments to indicative capacities, development requirements and guidelines for specific sites. As part of the review, officers have updated the Site Allocations Background Paper, which includes a methodology for setting the indicative site development capacities. Full details of representations and officer responses are set out in an Appendix to the Consultation Statement, which should be referred for further information.
Site allocations. Call for sites submissions.	The council invited to the public to submit additional sites for consideration as part of the Regulation 18 consultation. However it has been decided that additional sites will not be considered for inclusion as site allocations. This is because the public would not have an opportunity to appropriately comment

	on the proposals for those sites at the Regulation 19 stage. Also, that the council considers that the existing site portfolio is sufficient to meet identified needs, including for housing and business space. The site submissions will be considered in any subsequent Local Plan review, which the NPPF requires to be undertaken every 5 years.
Lewisham's Central Area (excluding site allocations)	
Varied perspectives between local communities and landowners/developers on development opportunities, scale and level of growth planned within and around Lewisham and Catford major centres.	Lewisham and Catford are the borough's principal town centres, which are located within a London Plan Opportunity Area, and are therefore considered appropriate locations for directing growth and investment, consistent with the spatial strategy. The Lewisham Town Centre Local Plan, which will be reviewed and replaced by the new Local Plan, has set a strategic framework for the centre and a significant amount of development has been consented and delivered in accordance with it. The Catford Town Centre Framework, which has been prepared through extensive consultation with the community, is an evidence base document which has informed the Local Plan. Site allocations have been updated and prepared to ensure clarity over development within the centres.
View that the plan does not adequately address Hither Green, particularly the area west of the railway.	The Local Plan has been amended to address this area in greater detail. This includes a new spatial objective and the designation of Hither Green Lane as a new Local Centre.
North area (excluding site allocations)	
Request for a 'community-led' masterplan to guide development and regeneration in the area.	The Local Plan sets the strategic development framework for managing growth and regeneration in the area. This includes site allocation policies for major development sites, many of which have now gained planning consent and development parameters have therefore been established. The Local Plan makes clear that development proposals must be delivered through a master-plan process, which must be prepared through consultation with local communities. The council has prepared a New Cross Area Framework through consultation with the local community and this has helped to inform the Local Plan, and will support its implementation.
Local Plan should do more to address polluting industry and lorry movements in area.	This part of the Borough contains designated Strategic Industrial Locations and waste management sites which the London Plan directs the Local Plan to safeguard for commercial and industrial uses. The Local Plan includes new

	policies on Deliveries, Servicing and Construction and Amenity to help manage impacts arising from activities associated with these uses.
Request that SELCHP (waste management facility) is redeveloped for alternative uses owing to pollution and inappropriate use in residential area.	The London Plan sets the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It directs the Local Plan to safeguard waste sites/facilities in order to meet the borough's apportioned tonnage of waste. The loss of a site is only permitted where a suitable alternative site can be found elsewhere in London. SELCHP plays an important role in helping to meet the London Plan waste apportionment figure. In the absence of an identified alternative site for this use, the Local Plan must continue to safeguard the land and facility for waste management uses, for the time being. However the Local Plan has been amended to include a new policy which seeks to improve the environmental performance of existing waste management facilities.
Concerns over amount of and access to green space in area planned to accommodate significant amount of growth	The Local Plan site allocations for the North area make provision for significant new publicly accessible open space to be delivered, including at Surrey Canal Triangle and Convoys Wharf. This includes new riverside spaces linking to the Thames Path and Surrey Canal Linear Walk and other components of the Lewisham Links network of cycleways and walking routes.
East area (excluding site allocations)	
Varied perspectives between local communities and landowners/developers on development opportunities, scale and level of growth planned within and around Lee Green district centre. This includes building heights and tall buildings.	Lee Green is a district centre and identified in the spatial strategy as a Growth Node. It is therefore considered an appropriate location for directing new development, growth and investment. This is particularly to enable and support the revitalisation of the town centre. Site allocations have been updated and prepared to ensure clarity over development within the centre. In addition, the Local Plan has been amended to provide more clarity on matters such as density and building heights, including for tall buildings informed by the Tall Buildings Study Addendum.
The Local Plan needs greater recognition and support for the network of Green Infrastructure, including the Railway Children Urban National	The draft Local Plan includes policies dealing with the distinctive 'linear network of green infrastructure' in the East area. Following the Regulation 18 consultation additional studies have been prepared on green infrastructure They include the Open Spaces Review, MOL Review Update and SINC

Park.	Surveys. Informed by this evidence, the Local Plan has been amended to set out a hierarchy of open spaces with policies to protect open space commensurate with their place in the hierarchy. The draft Local Plan vision for the East Area included an aim for Urban National Park. However the Local Plan has been amended to make reference to the aspiration for a District Park in the east area which reflects the Railway Children heritage. The Infrastructure Delivery Plan has also been updated to include this District Park in the priority list of projects.
Concerns about designation of Blackheath Village as night-time economy hub., particularly in terms of impact on local character and amenity.	The recognition of Blackheath district centre as a night-time economy hub of 'more than local significance' is established by the London Plan. This is given effect through the Local Plan by way of a designation and the main intention is to support the centre's long-term vitality and viability by building on its unique attributes. All development proposals will need to demonstrate that they will respond positively to local and historic character and not result in an unreasonable adverse impact on local amenity.
South area (excluding site allocations)	
General support for regeneration at Bell Green and Lower Sydenham, including redevelopment of retail parks. Request for a 'community-led' masterplan to guide this process. Concerns about loss of local jobs by redevelopment of Sainsbury's and other retailers.	The London Plan directs that boroughs should consider opportunities to enable the redevelopment of out-of-centre retail parks for a wider range of uses, including housing. The Local Plan makes provision for the reconfiguration and redevelopment of the retail park(s) for a new mixed-used neighbourhood. This will support a future town centre, which will continue to make provision for businesses and jobs. The Local Plan sets the strategic development framework for this, including site allocations. It also makes clear that development proposals must be delivered through a master-plan process, which must be prepared through consultation with local communities. The Local Plan has been amended to clarify that a local centre is appropriate for Bell Green through its redevelopment, informed by a new Retail Impact Assessment study.
The Local Plan lacks detail about Downham and the future objectives for this area.	Downham forms part of the Strategic Area for Regeneration identified in the draft Local Plan. The plan includes policies to direct new investment within this area including Downham district centre. The area comprises largely of established residential neighbourhoods. Owing to its distinctive

	cottage estate character there are limited major or large site redevelopment opportunities and therefore few site allocations in Downham.
The Local Plan lacks detail about Perry Hill and Perry Vale and the future objectives for this area.	The Perry Hill and Perry Vale area comprise largely of established residential neighbourhoods where sensitive intensification will be supported to deliver new homes and other area improvements. For clarity, the Local Plan has been amended with additional key spatial objectives for this part of the sub-area.
Reassurances required about protection of Livesey Memorial Hall and Gardens.	The draft Local Plan policies make clear that heritage assets must be conserved and enhanced. The Local Plan has been updated to bring the Livesey Memorial Hall and Gardens within the site allocation for the former Bell Green Gasholders. This will ensure that any future development proposals for the gasholders site address the Livesey Memorial Hall and Gardens as well as its wider setting through the masterplan process.
More needs to be done to improve walking and cycling environment, such as car dominance at Southend Land, the gyratory, etc.	The draft Local Plan provides the spatial planning framework for investment in transport within this area. The key spatial objectives for the sub-area make clear that the Healthy Streets Approach will be used to enable and enhance movement by walking and cycling. Specific measures will be considered on a case-by-case basis, having regard also to the council's Local Implementation Plan (LIP). In addition, the long-term objective is for the BLE Phase 2 to be delivered within the area, which will enable transformational improvements in public transport.
West area (excluding site allocations)	
General support for revitalisation of Forest Hill district centre. Request for a 'community-led' masterplan to guide this process.	The Local Plan sets the strategic development framework for managing growth and revitalisation of the area. This includes site allocation policies for major development sites and the area around the station approach. The Local Plan makes clear that development proposals must be delivered through a master-plan process, which must be prepared through consultation with local communities. Officers have considered the proposals included in a previously prepared community-led masterplan and efforts have been made to reflect this in the Local Plan. However, there are some limitations around the feasibility of some aspects of the community masterplan, such as works to Transport for London Roads (e.g. South Circular) and other parts of the public realm, and these have not

	therefore been included in the plan.
Concerns and objections raised about proposals for employment land at Willow Way and at Upper Kirkdale local centre.	Following the Regulation 18 consultation the council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
The Local Plan lacks detail about Ladywell the future objectives for this area.	The Ladywell area comprises largely of an established residential neighbourhood where sensitive intensification will be supported to deliver new homes and other area improvements. Owing to its distinctive historic character there are limited major or large site redevelopment opportunities and therefore few site allocations in Ladywell.
View that the area around Drakefell and Gellatly Roads is overlooked and that more details are required given this is a prominent movement corridor.	The Local Plan has been amended to provide further details for this area, particularly in terms of supporting the Healthy Streets Approach along the corridor.

5.6 Part Four: Delivery and monitoring

Main Issues	Response / action(s)
Delivery	
Suggestion that the Planning Obligations guidance should be reviewed and updated in tandem with the Local Plan.	The council will prepare a future update to the SPD. The Local Plan Viability Assessment has informed the setting of any formulaic approaches to calculating contributions, so to ensure these have been viability tested.
Monitoring	
Monitoring framework is limited and should be expanded.	The monitoring framework is considered proportionate to the Local Plan and focuses on the key objectives set out in Part 1. The council's key plans and strategies also include monitoring frameworks to support their delivery. However it is acknowledged that the framework could benefit from additional indicators and it has therefore been supplemented.

5.7 Part Five: Appendices and schedules

Main Issues	Response / action(s)
Schedules	
Comments regarding land-use designations and requests for changes to these. This is particularly in respect to designations for open spaces, nature sites and town centres.	Following the Regulation 18 consultation the council has undertaking additional evidence base studies. Informed by these studies the Local Plan has been amended with changes to some designations set out in the Regulation 18 draft Local Plan. The majority of the changes relate to the section on green infrastructure.

5.8 Supporting documents and materials

Main Issues	Response / action(s)
Integrated Impact Assessment (IIA) / Habitats Regulations Assessment	
Comments on the scope of the Sustainability Appraisal Framework and assessments included in the Interim IIA Report.	Representations on the interim IIA and HRA Reports have been considered and used to inform the Final IIA Reports.
Recommendations for improving or strengthening the Local Plan policies, such as for approaches to river restoration and biodiversity.	The Local Plan policies on Green Infrastructure and Sustainable Design and Infrastructure have been reviewed an amended, taking into account this feedback.
Infrastructure Delivery Plan	
The population projections included in the IDP are out of date and do not adequately account for the impacts of Covid-19 and Brexit.	Population projections included in the draft IDP have been reviewed and updated, taking into account the latest borough-level population forecasts prepared by the Greater London Authority. The IDP has been re-circulated to internal and external stakeholders for their consideration, and updated where appropriate.
New information provided on infrastructure needs and projects, delivery timescales and funding gaps.	The draft IDP has been updated with the latest available information.

6 APPENDICES

Appendix 1 Regulation 18 draft Local Plan Consultation Publicity

Emails and letters
Press notices
Example site notice
Lewisham Life
Council webpage notices
Citizen Space consultation hub
Commonplace consultation hub
Social media notifications
Call for Sites form(s)
Press: NewsShopper articles

Appendix 2 Regulation 18 Draft Local Plan Written Responses

Appendix 3 Regulation 18 Draft Local Plan Commonplace Responses

Appendix 4 Regulation 18 Commonplace Interactive Map Responses

Appendix 5 Post Regulation 18 Seldom Heard Groups Engagement Report

Lewisham Local Plan

Regulation 18 Consultation Statement

Appendix 1 Regulation 18 Draft Local Plan Consultation Publicity

July 2022

LONDON BOROUGH OF LEWISHAM

Planning and Compulsory Purchase Act 2004

The Town and Country Planning (Local Planning) (England) Regulations 2012

Public participation on the preparation of the local plan in accordance with The Town and Country Planning (Local Planning)(England) Regulations 2012 (Regulation 18), notice is hereby given that Lewisham Council is consulting on the following documents which are available for inspection and comment.

- Lewisham Local Plan: Main Issues and Preferred Approaches
- Proposed Changes to the adopted Policies Map
- Integrated Impact Assessment and Non-technical Summary
- Habitats Regulations Assessment
- Draft Infrastructure Delivery Plan

The consultation is open from 15th January 2021 to 11th April 2021. This is an early stage of consultation on a new Local Plan for Lewisham which, once adopted, will replace the currently adopted documents as follows: Core Strategy (2011), Site Allocations (2013), Development Management (2014) and Lewisham Town Centre (2014) local plans.

As a result of the Covid-19 pandemic, we are currently unable to present copies of the documents for physical inspection at locations throughout the borough, however all documents will be made available for inspection and comment online at the following websites:

- https://lewishamlocalplan.commonplace.is/
- https://consultation.lewisham.gov.uk/planning/lewisham-local-plan-regulation-18-public-consultat/

The Council will also be holding a series of online information sessions. To register your interest for the information sessions please visit the Local Plan Commonplace webpage which can be accessed via the link above, or by visiting the online registration webpage below.

- https://consultation.lewisham.gov.uk/planning/lpo/

Representations must be submitted before or on the 11th April 2021. Representations can also be submitted by e-mail and post.

Email: localplan@lewisham.gov.uk

Post: Strategic Planning, Laurence House,
1 Catford Rd, Catford, London, SE6 4RU

If you require the consultation documents in an alternative format, please contact localplan@lewisham.gov.uk

Lewisham

Public Notice from Newshopper 27 January 2021

Future plans

The Council is developing a new Local Plan, and we need your input



What is a Local Plan?

Planning affects all of our lives – where and how we live, work, and relax. The Government requires all local authorities to provide a long term Local Plan to meet our needs for the future. This is a document that sets out where new developments should go in the borough, how they will look, and what they should be used for.

If we do not have a Local Plan, development will still take place. However we will not be able to use our own planning policies to help decide where development should go, and will be less able to require the schools, open space and road upgrades that are needed to support development.

A vision for Lewisham

Lewisham will continue to be a welcoming place where people of all ages and cultural backgrounds live and thrive. A place that people want to visit and live in, where they choose to stay and enjoy a good quality of life.

It is important that Lewisham plays a part in London's greener future, responding to the global climate emergency and becoming a healthier, cleaner place for all.

As well as covering key issues such as housing and transport, the Local Plan addresses five character areas in the borough so you can find out and share your ideas for your local neighbourhood.

How can I have my say?

This consultation on the Local Plan started on 15 January 2021 and will run until 11 April 2021. We want anyone who lives, works or has an interest in the borough to tell us what you think about the Local Plan.

Catford's revival

One major project, reflected in the Local Plan, is the regeneration of Catford town centre. Four years of community engagement with ideas from local people has led to the creation of the draft Catford Town Centre Framework, a long-term vision for Catford.

Despite Covid-19 restrictions, the final phase of community engagement on this Framework Plan concluded earlier this month following a series of Zoom sessions and a dedicated newsletter delivered to households across Catford. More than 2,700 residents have helped us to shape a vision for how the community wants Catford to grow. The Framework Plan is due to be finalised by Lewisham Council this spring with early projects, such as improvements to the area around the stations and the restoration of the former Catford Constitutional Club building starting in the next year or two.

Find out more about the plans to deliver thousands of new homes and deliver improvements for the local community at www.teamcatford.com





Artist drawings of the regeneration of Catford town centre

Find out more

lewishamlocalplan.commonplace.is
Sign up to join an information sessions on Zoom at https://consultation.lewisham.gov.uk/planning/lpo/
or email localplan@lewisham.gov.uk

Local Plan Advertisement – Lewisham Life Spring 2021

Lewisham's new Local Plan

Consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012

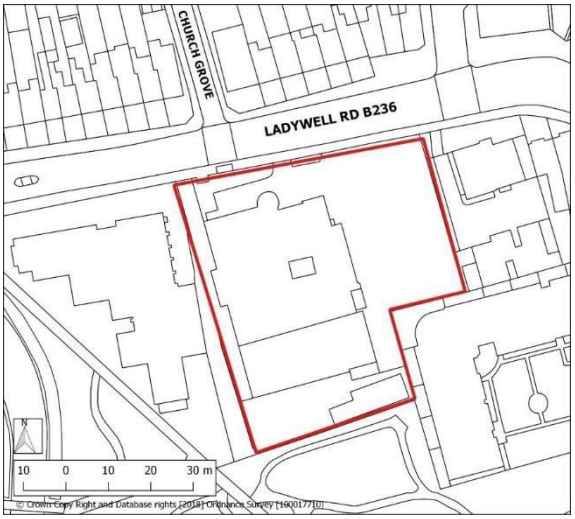
About the Lewisham Local Plan

The Local Plan helps to ensure that planning decisions are made in the best interests of our neighbourhoods and communities. It provides a strategy for the Council and its partners to direct investment across Lewisham, along with policies and guidelines used to determine planning applications.

What is a Site Allocation?

The Local Plan includes 'Site Allocation' policies which make clear our expectations for the use of land and design of development on specific sites in order to support the delivery of the Local Plan.

Proposed site: Ladywell Play Tower



Site address: Former swimming pool, Ladywell Road, Lewisham, SE13 7UW

Proposal: Mixed-use development comprising main town centre, community and residential uses. Restoration and enhancement of the Grade II listed Ladywell Baths

Indicative development capacity:

- 33 residential units
- 1,459m² of main town centre floorspace

When will this happen?

As part of this consultation, we seek to understand:

- whether the development proposed is suitable; and
- an estimated time frame for delivery

Have your say:

View consultation documents and provide us with comments from 15 January 2021 to 11 April 2021 **online** at:

- https://lewishamlocalplan.commonplace.is or;
- https://consultation.lewisham.gov.uk/planning/localplanconsultation.

Comments may also be provided by:

- **Email**: localplan@lewisham.gov.uk
- **Post**: Planning Policy, 5th Floor Laurence House, 1 Catford Rd, London, SE6 4RU



Lewisham

Planning Service
Laurence House
Catford
London SE6 4RU

direct line 020 8314 3885
localplan@lewisham.gov.uk

date 18/02/21
our reference
your reference

Dear Sir / Madam

Re: Lewisham Local Plan: Main Issues and Preferred Approaches consultation

Lewisham's Central Area 2: Lewisham Shopping Centre

We are writing to inform you about a public consultation on Lewisham's new Local Plan, which Lewisham Council is undertaking in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations.

Following a review of Land Registry records, we understand that you may have an interest as a leaseholder for part or all of the land that falls within, or in proximity to, a site which we are proposing for future redevelopment. The draft Local Plan includes a 'site allocation' policy that sets out land-use principles and development guidelines which all future planning applications will be considered against.

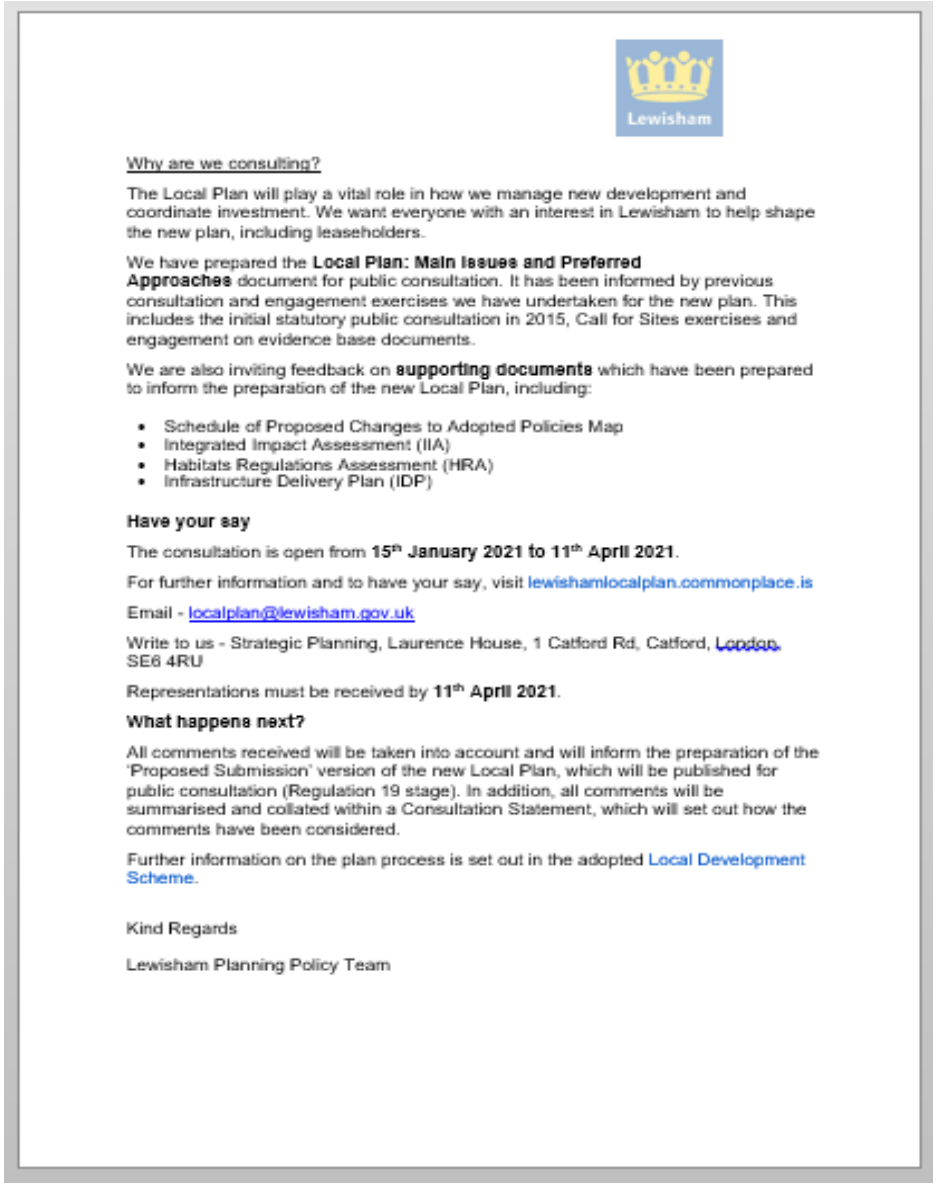
About the Local Plan

The Local Plan sets out a long-term strategy for the Council and its partners to direct investment across the borough. It also makes up part of the Council's statutory Development Plan, and includes policies and guidelines that are used to determine planning applications.

A new Local Plan for Lewisham

The Council's existing Local Plan is made up of a package of documents. The Lewisham Core Strategy is the main document and was adopted in 2011. It is supported by the Site Allocations, Development Management and Lewisham Town Centre plans.

The Council is legally required to review its local plan every five-years. We are therefore reviewing and updating our adopted plans, bringing them together into a single document. The new Local Plan will cover a twenty year period, looking ahead to 2040.



Lewisham

Why are we consulting?

The Local Plan will play a vital role in how we manage new development and coordinate investment. We want everyone with an interest in Lewisham to help shape the new plan, including leaseholders.

We have prepared the **Local Plan: Main Issues and Preferred Approaches** document for public consultation. It has been informed by previous consultation and engagement exercises we have undertaken for the new plan. This includes the initial statutory public consultation in 2015, Call for Sites exercises and engagement on evidence base documents.

We are also inviting feedback on **supporting documents** which have been prepared to inform the preparation of the new Local Plan, including:

- Schedule of Proposed Changes to Adopted Policies Map
- Integrated Impact Assessment (IIA)
- Habitats Regulations Assessment (HRA)
- Infrastructure Delivery Plan (IDP)

Have your say

The consultation is open from **15th January 2021 to 11th April 2021**.

For further information and to have your say, visit lewishamlocalplan.commonplace.is

Email - localplan@lewisham.gov.uk

Write to us - Strategic Planning, Laurence House, 1 Catford Rd, Catford, London, SE6 4RU

Representations must be received by **11th April 2021**.

What happens next?

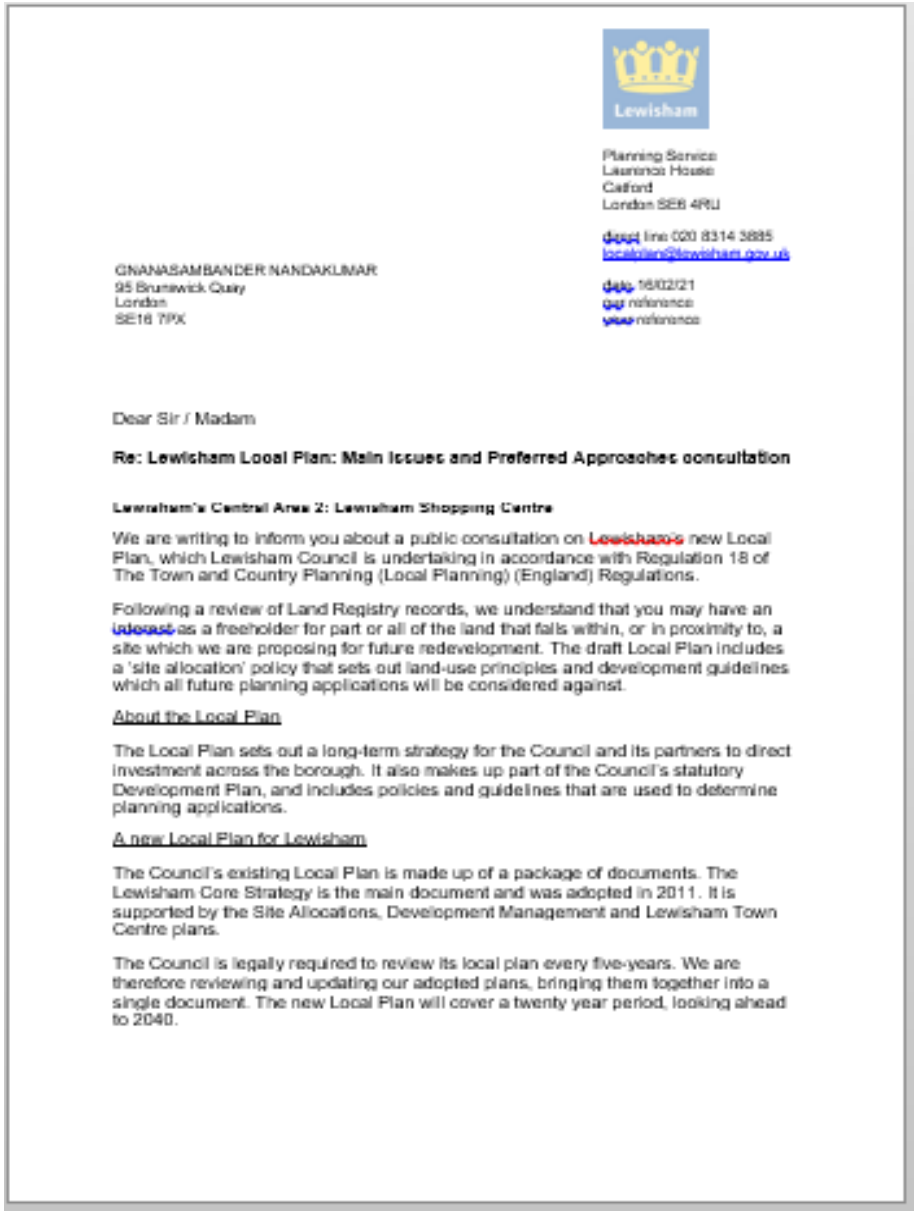
All comments received will be taken into account and will inform the preparation of the 'Proposed Submission' version of the new Local Plan, which will be published for public consultation (Regulation 19 stage). In addition, all comments will be summarised and collated within a Consultation Statement, which will set out how the comments have been considered.

Further information on the plan process is set out in the adopted Local Development Scheme.

Kind Regards

Lewisham Planning Policy Team

Example of letters sent to Leaseholders – 18/02/2021



Planning Service
Laurence House
Catford
London SE6 4RU

dppt line 020 8314 3885
localplan@lewisham.gov.uk

date 16/02/21
our reference
your reference

GNANASAMBANDER NANDAKUMAR
95 Brunswick Quay
London
SE16 7PX

Dear Sir / Madam

Re: Lewisham Local Plan: Main Issues and Preferred Approaches consultation

Lewisham's Central Area 2: Lewisham Shopping Centre

We are writing to inform you about a public consultation on Lewisham's new Local Plan, which Lewisham Council is undertaking in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations.

Following a review of Land Registry records, we understand that you may have an interest as a freeholder for part or all of the land that falls within, or in proximity to, a site which we are proposing for future redevelopment. The draft Local Plan includes a 'site allocation' policy that sets out land-use principles and development guidelines which all future planning applications will be considered against.

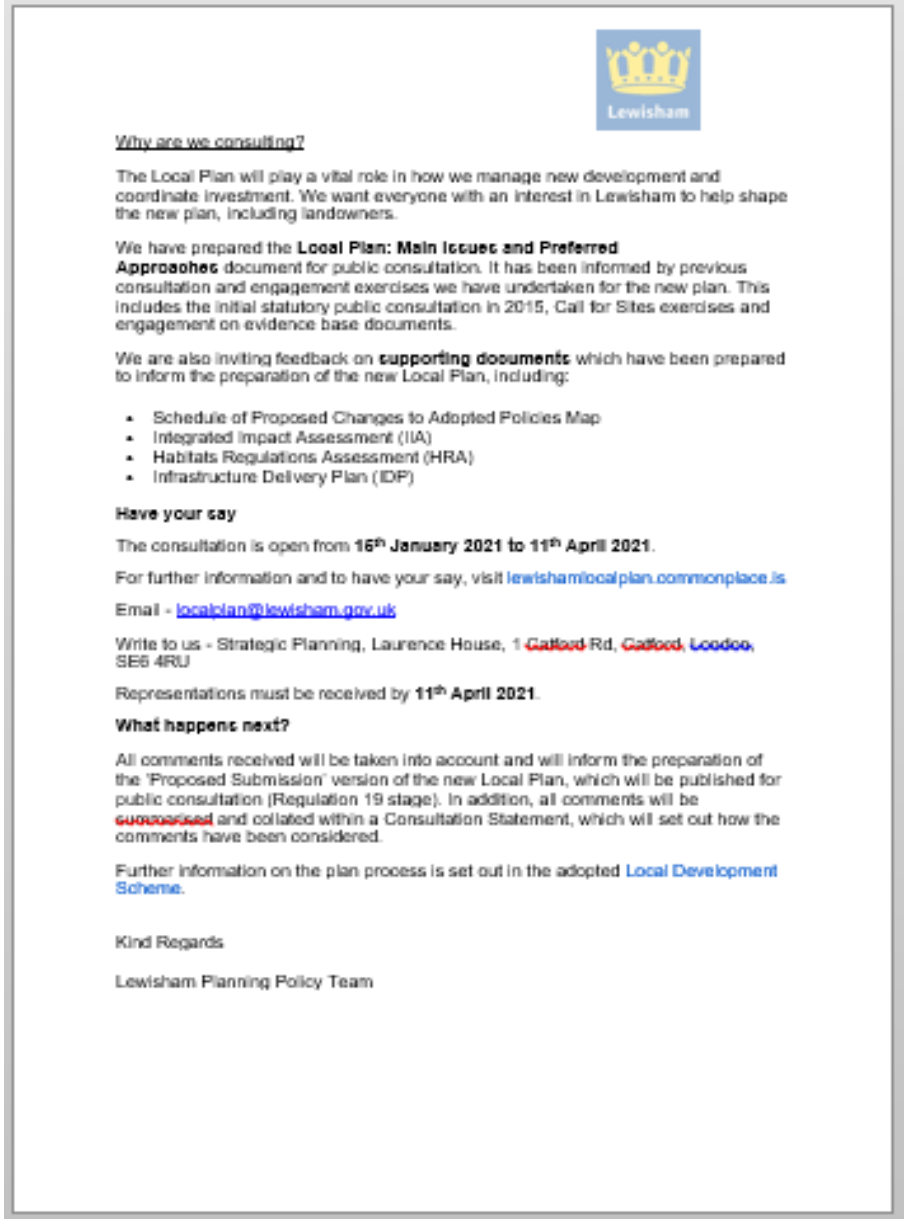
About the Local Plan

The Local Plan sets out a long-term strategy for the Council and its partners to direct investment across the borough. It also makes up part of the Council's statutory Development Plan, and includes policies and guidelines that are used to determine planning applications.

A new Local Plan for Lewisham

The Council's existing Local Plan is made up of a package of documents. The Lewisham Core Strategy is the main document and was adopted in 2011. It is supported by the Site Allocations, Development Management and Lewisham Town Centre plans.

The Council is legally required to review its local plan every five-years. We are therefore reviewing and updating our adopted plans, bringing them together into a single document. The new Local Plan will cover a twenty year period, looking ahead to 2040.



Why are we consulting?

The Local Plan will play a vital role in how we manage new development and coordinate investment. We want everyone with an interest in Lewisham to help shape the new plan, including landowners.

We have prepared the **Local Plan: Main Issues and Preferred Approaches** document for public consultation. It has been informed by previous consultation and engagement exercises we have undertaken for the new plan. This includes the initial statutory public consultation in 2015, Call for Sites exercises and engagement on evidence base documents.

We are also inviting feedback on **supporting documents** which have been prepared to inform the preparation of the new Local Plan, including:

- Schedule of Proposed Changes to Adopted Policies Map
- Integrated Impact Assessment (IIA)
- Habitats Regulations Assessment (HRA)
- Infrastructure Delivery Plan (IDP)

Have your say

The consultation is open from **16th January 2021 to 11th April 2021**.

For further information and to have your say, visit lewishamlocalplan.commonplace.is

Email - localplan@lewisham.gov.uk

Write to us - Strategic Planning, Laurence House, 1 Catford Rd, Catford, London, SE6 4RU

Representations must be received by **11th April 2021**.

What happens next?

All comments received will be taken into account and will inform the preparation of the 'Proposed Submission' version of the new Local Plan, which will be published for public consultation (Regulation 19 stage). In addition, all comments will be summarised and collated within a Consultation Statement, which will set out how the comments have been considered.

Further information on the plan process is set out in the adopted Local Development Scheme.

Kind Regards

Lewisham Planning Policy Team

Example of letters sent to Freeholders – 16/02/2021

Dear Consultee,

Share your views on Lewisham's new Local Plan

We are preparing a new Local Plan, which will help shape Lewisham to 2040.

The Local Plan helps to ensure that planning decisions are made in the best interests of our neighbourhoods and communities.

It provides a strategy for the Council and its partners to direct investment across Lewisham, recognising it is an integral part of London. It includes policies and guidelines that are used to determine planning applications.

Why do we need a new Local Plan?

A Local Plan should be updated regularly so it continues to deliver on the aspirations of our communities; to guide us to help meet Lewisham's needs as London grows; respond to the climate emergency; support the borough's recovery from COVID-19; and to boost the Council's ability to secure investment for instance, bringing the Bakerloo line to Lewisham.

Our existing local plan is made up of a package of documents. The Lewisham Core Strategy is the main document and was adopted in 2011. It is supported by the Site Allocations, Development Management and Lewisham Town Centre plans.

The Council is legally required to review its local plan every five years. We are therefore reviewing and updating our adopted plans, bringing them together into a single document. The new Local Plan will cover a twenty year period, looking ahead to 2040.

Why are we consulting?

The Local Plan will play a vital role in how we manage new development and coordinate investment. We want everyone with an interest in Lewisham to help shape the new plan. This includes local residents, community groups, businesses and other stakeholders.

We have prepared the **Local Plan: Main Issues and Preferred Approaches** document for public consultation. It has been informed by previous consultation and engagement exercises we have undertaken for the new plan. This includes the initial statutory public consultation in 2015 along with engagement on evidence base documents (such as the Lewisham Characterisation Study, New Cross Area Framework and Catford Town Centre Masterplan).

We are also inviting feedback on **supporting documents** which have been prepared to inform the preparation of the new Local Plan, including:

- Schedule of Proposed Changes to Adopted Policies Map
- Integrated Impact Assessment (IIA)
- Habitats Regulations Assessment (HRA)
- Infrastructure Delivery Plan (IDP)

The consultation is being held in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 which set out what Local Planning Authorities are required to do in relation to the preparation of a local plan.

Call for sites

As part of this consultation we are also carrying out a further **'**Call for Sites' exercise. This is to establish whether there are additional sites that are potentially available in the borough for development for housing, economic development and other uses.

Have your say

The consultation is open from **15th January 2021 to 11th April 2021**.

For further information and to have your say, visit lewishamlocalplan.commonplace.is

Email - localplan@lewisham.gov.uk

Write to us - Strategic Planning, Laurence House, 1 Catford Rd, Catford, London, SE6 4RU

Representations must be received by **11th April 2021**.

What happens next?

All comments received will be taken into account and will inform the preparation of the 'Proposed Submission' version of the new Local Plan, which will be published for public consultation (Regulation 19 stage). In addition, all comments will be summarised and collated within a Consultation Statement, which will set out how the comments have been considered.

Further information on the plan process is set out in the adopted Local Development Scheme.

Kind Regards

Lewisham Planning



Dear consultee,

Further to our email of 15th January 2021 in respect of the consultation on **Lewisham's new Local Plan**, which is being undertaken in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012

We are currently inviting comments on the Lewisham Local Plan: Main Issues and Preferred Approaches document along with a number of supporting documents including:

- Proposed changes to the adopted Policies Map
- Interim Integrated Impact Assessment (IIA) and Non-technical Summary
- Habitats Regulations Assessment
- Draft Infrastructure Delivery Plan

The Interim IIA is informed by and builds on the Sustainability Appraisal Scoping Report (2015), which we published and consulted you on previously as part of our initial Consultation on the Main Issues for the new Local Plan. As a statutory consultee, we are inviting your comments on the scope and findings of the IIA. Please see the Interim IIA report for further details.

Comments must be received by **11th April 2021**. The consultation documents and further information can be accessed online at our consultation webpages at

https://lewishamlocalplan.commonplace.is/ and

https://consultation.lewisham.gov.uk/planning/lewisham-local-plan-regulation-18-public-consultat/

Evidence base documents

We have prepared a number of evidence base documents to support the preparation of Local Plan. This includes updates to our **Strategic Flood Risk Assessment** (Level 1 and 2) which are available to view here.

We have also prepared a draft **Sequential and Exception Test** report (attached). This has not yet been published in the public domain. At this time, we are seeking early feedback from the Environment Agency on this emerging work, prior to it being published at the Regulation 19 stage. Ideally, feedback would be received by 11th April 2021. We understand there may be additional costs for your review of this, and would be grateful if you could advise.

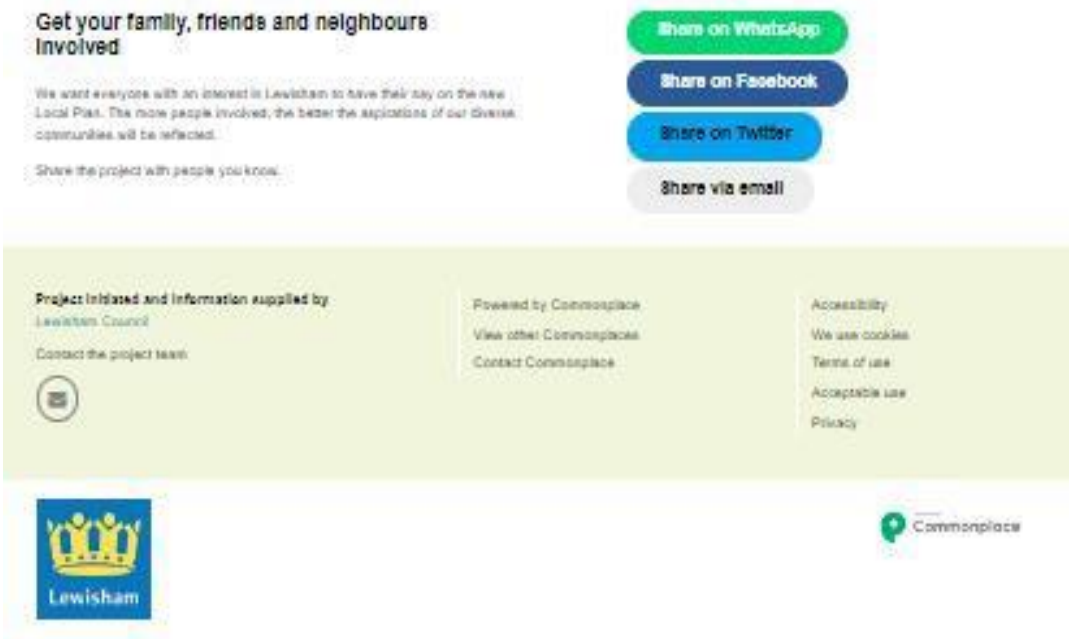
Finally, we would also like to take this opportunity to invite you to meet with one of the Council's planning officers to discuss the new Local Plan. Please contact the planning policy team at localplan@lewisham.gov.uk should this be of interest, and we will be happy to make arrangements in due course.

Kind regards

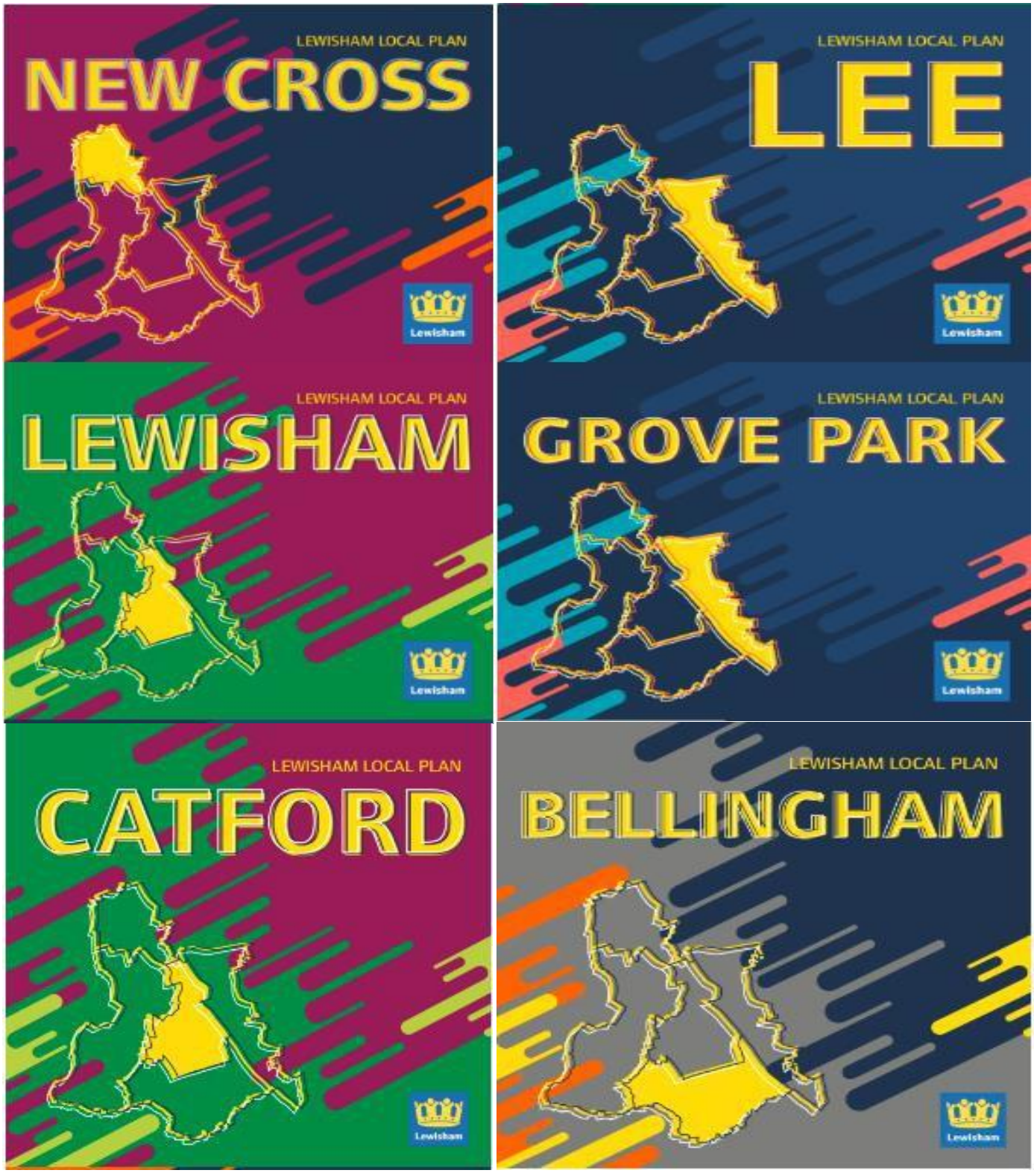
Lewisham Planning







Landing page for the Local Plan Commonplace consultation website – Launched 15/01/2021



Examples of virtual postcards used to promote area specific policies



Commonplace “Heat Map” used for informal location based submissions

Lewisham Council @Lewisham... · 28 Feb

Make sure your voice is heard. We are preparing a new **Local Plan** which will play a vital role in shaping **Lewisham** to 2040. Find out more and have your say here: lewishamlocalplan.commonplace.is



4 2

Lewisham Council @Lewisham... · 14 Feb

Have your say on **Lewisham**'s new **Local Plan** and contribute your views on how the **Lewisham** of the future should look. Find out more and comment here: lewishamlocalplan.commonplace.is



3 7 6

Lewisham Council @Lewisham... · 31 Jan

Our new **Local Plan** will play a vital role in shaping **Lewisham** to 2040. Join one of our Virtual Town Hall events to find out more. lewishamlocalplan.commonplace.is/proposals/onli...



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Lewisham Council @Lewisham... · 23 Jan

We are preparing a new **Local Plan** which will play a vital role in shaping **Lewisham** to 2040. We want everyone with an interest in **Lewisham** to have their say. Find out more here: lewishamlocalplan.commonplace.is



2 15 14

Lewisham Council @Lewisham... · 19 Jan

Make sure your voice is heard. We are preparing a new **Local Plan** which will play a vital role in shaping **Lewisham** to 2040. Find out more and have your say here: lewishamlocalplan.commonplace.is



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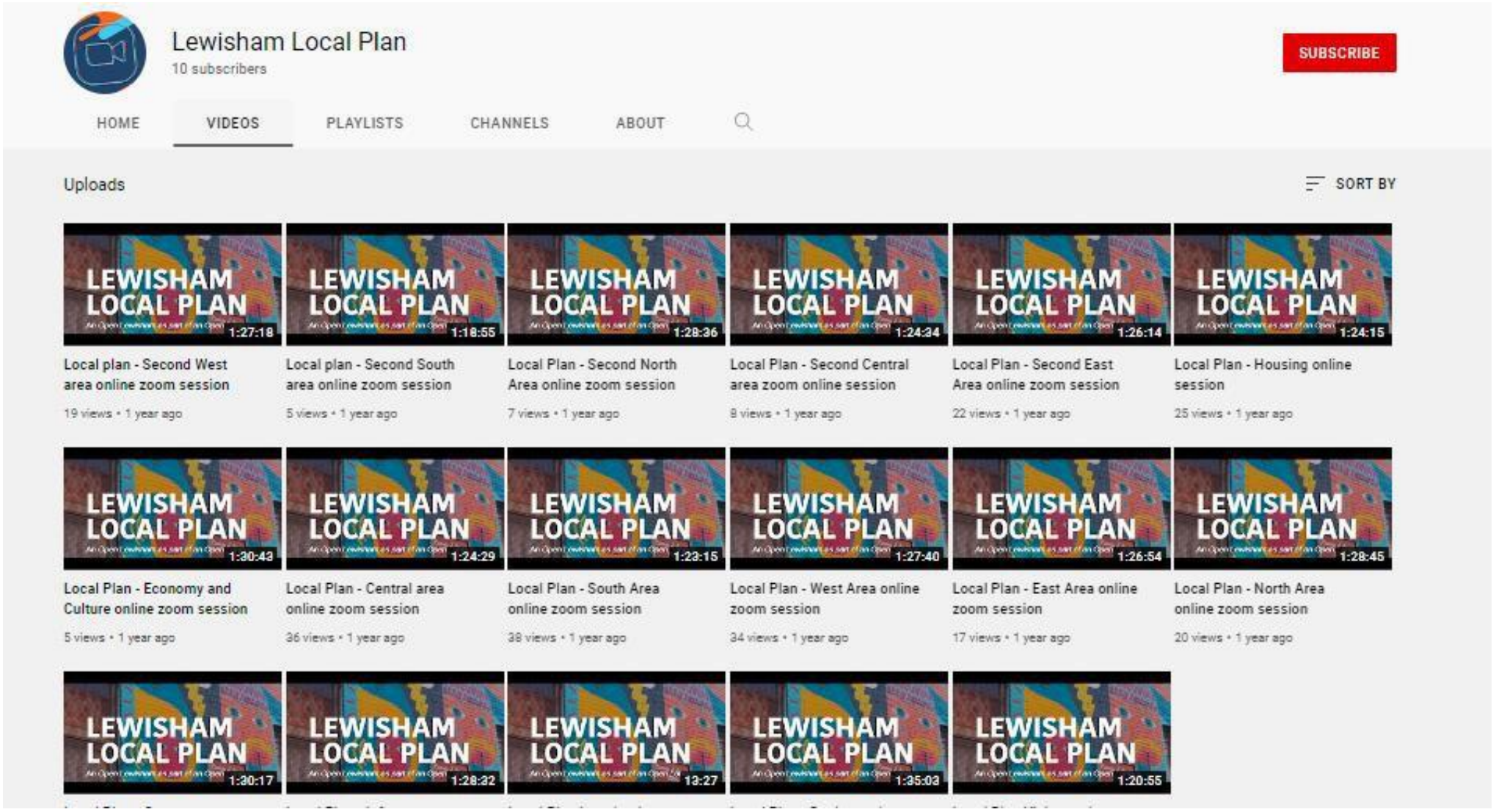
Lewisham Council @Lewisham... · 15 Jan

We are preparing a new **Local Plan** which will play a vital role in shaping **Lewisham** to 2040. We want everyone with an interest in **Lewisham** to have their say. Find out more here: lewishamlocalplan.commonplace.is



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Examples of tweets promoting Local Plan consultation from official Council Twitter account



Recordings of Local Plan consultation Zoom sessions to Youtube

Lewisham Council asks for views on draft local plans

23rd February 2021

Lewisham Local Plan: East

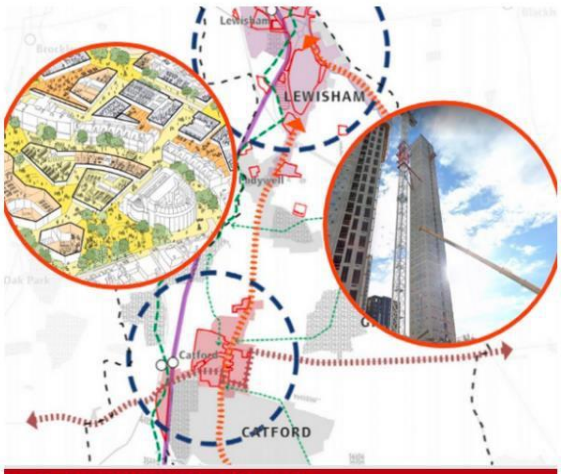
6th March 2021



The local plan will set out long-term development strategy until 2040

Lewisham's draft local plan: Central

21st March 2021



Lewisham Council is consulting on its draft local plan

Local plan: Lewisham's vision for the south

13th March 2021



Local Plan South

Lewisham draft local plan: West

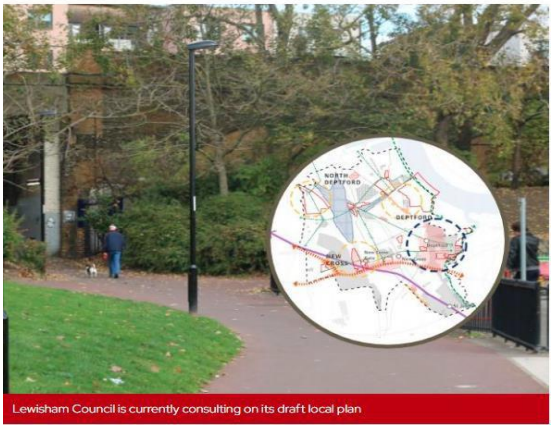
21st February 2021



Here's where more than 1,000 new homes could be built in west Lewisham

Local Plan: Lewisham's vision for north

27th February 2021



Lewisham Council is currently consulting on its draft local plan

Article headlines promoting Local Plan consultation in Newshopper

Website links to Newshopper articles promoting Local Plan consultation

General notification - https://www.newsshopper.co.uk/news/19112312.lewisham-council-asks-views-draft-local-plans/

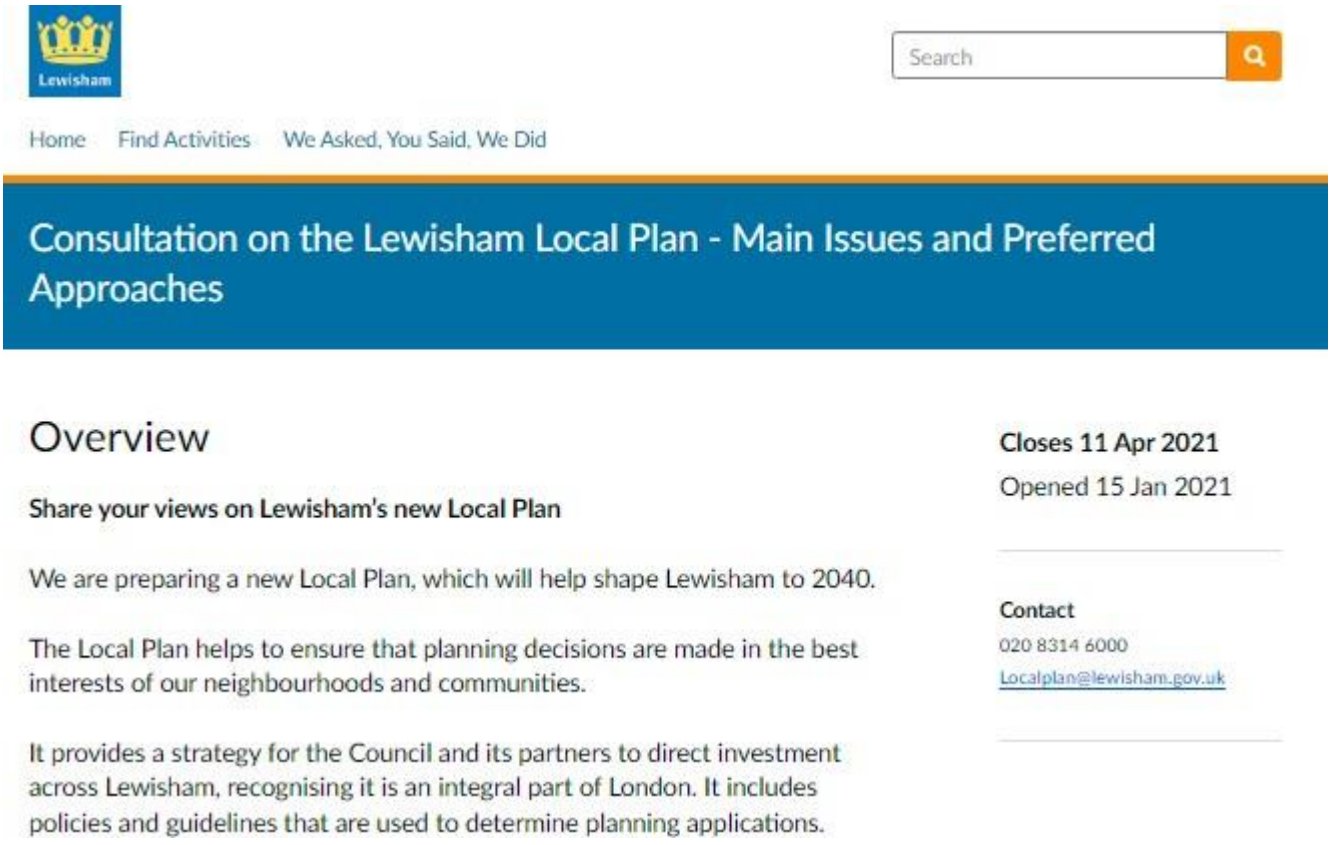
East area - https://www.newsshopper.co.uk/news/19139815.lewisham-local-plan-east/

Central Area - https://www.newsshopper.co.uk/news/19174567.lewishams-draft-local-plan-central/

South Area - https://www.newsshopper.co.uk/news/19150365.local-plan-lewishams-vision-south/

West Area - https://www.newsshopper.co.uk/news/19104743.lewisham-draft-local-plan-west/

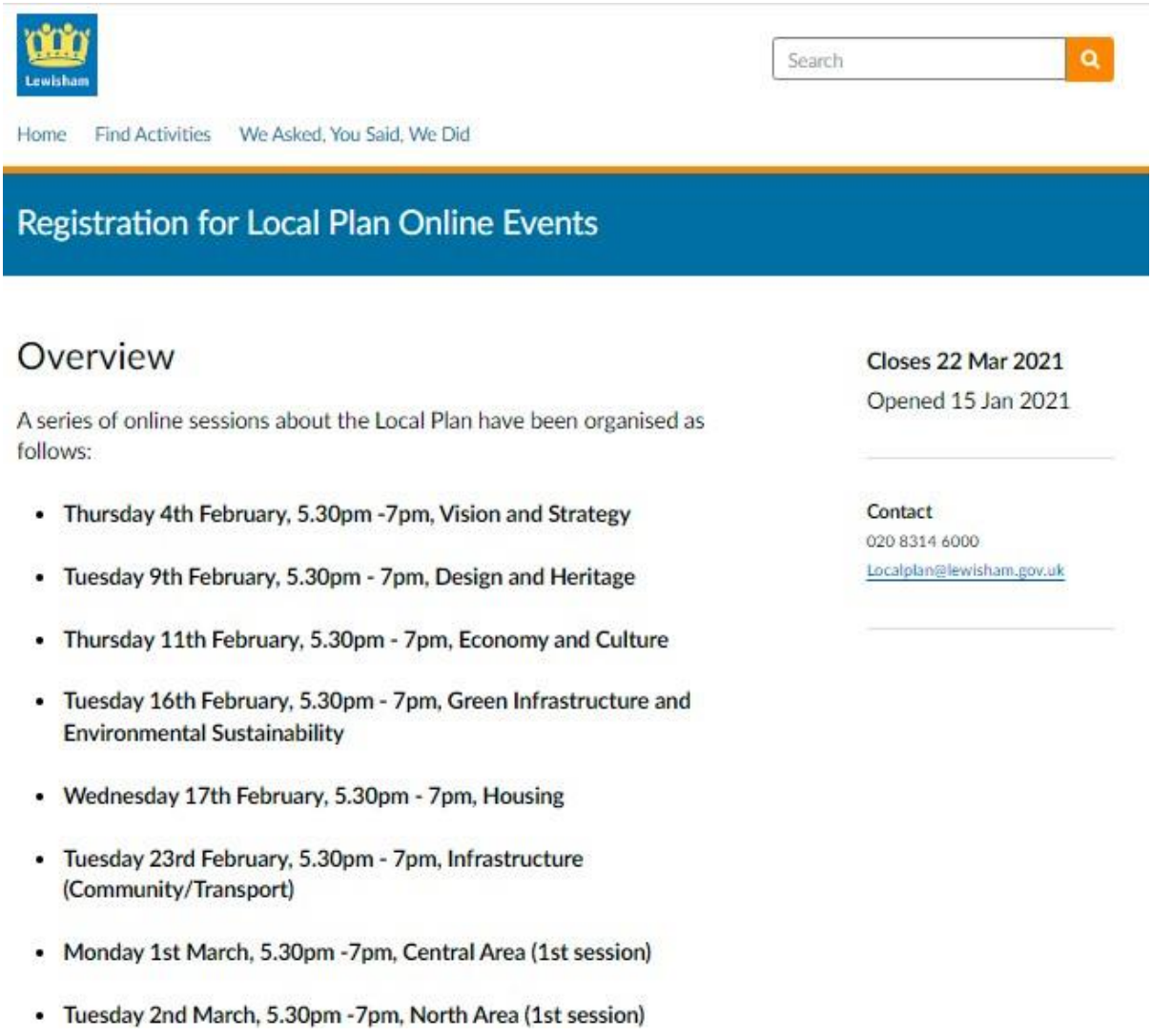
North Area - https://www.newsshopper.co.uk/news/19121948.local-plan-lewishams-vision-north/



Notification of consultation on Lewisham Council's Citizen Space

Link to notification of consultation on Citizen Space:

https://consultation.lewisham.gov.uk/planning/lewisham-local-plan-regulation-18-public-consultat/



Section of Citizen Space webpage used to register for Local Plan Zoom sessions

Link to registration page for Local Plan Zoom sessions :

https://consultation.lewisham.gov.uk/planning/lpo/



Section of Council website that promoted the Local Plan consultation and provided a post consultation update.

Link to Council webpage that promoted the Local Plan consultation:

https://lewisham.gov.uk/myservices/planning/policy/planning/current-and-future-consultations

Lewisham Local Plan

Regulation 18 consultation statement

Appendix 2 – Regulation 18 Draft Local Plan Written Responses Split Part 0

September 2022

Organisation (if relevant)	Part	Section, policy or paragraph	Comment	Council officer response	Action
	-	-	I object to the permanent loss of the drying area, and green space, these are needed for our health and wellbeing. I am also concerned about the loss of emergency access to the back of the flats, we use it in good weather. The loss of the parking space would be a problem for me and others at my age, 75 years old.	This response seems to relate to a specific planning application and not the Local Plan consultation. Members of the public will be able to comment on specific applications through the Development Management process.	No change.
	-	-	I enthusiastically support the proposed house building for this site and am very much against the mimbyism of some of my neighbours I'm respect of this. My concerns about the proposals are regarding the conservation of the over one dozen mature trees that line the inner perimeter of the site. They constitute a substantial and valuable amenity and in my opinion must be conserved to ensure the visual and general environmental impact of this prominent hill top position. I trust you will have full regard to this issue in the design of these new builds and especially during their construction. Is it possible to have Tree Protection Orders applied to these trees	This response seems to relate to a specific planning application and not the Local Plan consultation. Members of the public will be able to comment on specific applications through the Development Management process.	No change.
	-	-	There are several reasons why I do not agree with our estate being built on. 1. We do not have much amenity land on which to build and will cause being overlooked. 2. It will cause problems with car parking having to be in the road (Longton Grove) plus where are emergency services going to park if called out. 3. Access to adjoining estate (which is our right of way to buses and shops in Wells Park Road) not everyone has a car, will be non-existent 4. Doing away with drying areas means there will only be 1 left under block 1-12 Our grassed area in the middle of the estate will not be available to sit out on during better weather. The main driveway and road into Markwell Close badly needs resurfacing. Would be nice to see the estate have some bulbs put in where artificial cherry trees were before Council chopped them down! I know the inconvenience and noise that can be caused as I was here when Wells Park estate and Longton Grove/Avenue were built. There must be bigger areas in Lewisham to build on instead of overcrowding our small one.	This response seems to relate to a specific planning application and not the Local Plan consultation. Members of the public will be able to comment on specific applications through the Development Management process.	No change.
NHS Property Services	-	Call for sites	**South Lewisham Health Centre** South Lewisham Health Centre comprises a building which operates for health care purposes. This accommodates 1,264 sqm (GEA) of Class E (formerly D1) health centre floorspace, formed over two storeys, including a glazed roof atrium/reception area. The site occupies a regular sized plot extending to 0.25ha. The topography on the site is generally flat and the existing building is of no architectural merit. Unlike Jenner Health Centre, South Lewisham Health Centre is not included within the draft Local Plan as a proposed allocation, despite being submitted as part of the 2018 Call for Sites exercise by NHSPS. NHSPS would therefore seek to re-promote South Lewisham Health Centre as suitable, available and achievable in development terms.	Noted. The Council invited to the public to submit additional sites for consideration as part of the Regulation 18 consultation. However it has been decided that additional sites will not be considered for inclusion as site allocations. This is because the public would not have an opportunity to appropriately comment on the proposals for	No change.

			Like Jenner Health Centre, NHSPS are the freehold owners of South Lewisham Health Centre and we have been working to understand development capacity of the site to allow for a high-quality redevelopment which would re-provide healthcare accommodation and provide new housing within a phased development. This process is the result of an identified need stated in Lewisham's Infrastructure Delivery Plan (2015) for improved health care facilities in the borough. The site is also identified within the Bromley Road, Southend Village SPD as being suitable for enhanced health centre uses. In this case, there is the need to upgrade the site in line with NHS and CCG objectives and to improve the standard of health provision within an integrated model of care. Moreover, as with Jenner Health Centre, the development is directly associated with a public service transformation programme and is necessary to enable and sustain the delivery of service improvements and related investment in community infrastructure. The overall approach and principle of an allocation on this site could be consistent with the draft allocation on Jenner Health Centre, the prosed wording of which is set out below: **Site allocation:** Comprehensive mixed-use redevelopment of existing health centre with enabling residential, or residential only, if the existing services are relocated within an alternative healthcare facility in the wider area. Generally, the site is located in a strategic and prominent location in the Borough, in between Bellingham Local Centre and Beckenham Hill District Centre. Immediately to the south of the site is a recent residential development - Astral House – which steps up from the healthcare site from 3 - 6-storeys plus and includes a 9-storey tower. This development represents a strong stepping and transition from the suburban properties in its immediate context. Overall, it is considered there is strong potential to intensify the existing uses on site, to modernise and improve healthcare services and provide new homes on public sector land. NHSPS would therefore implore the Council to include South Lewisham Health Centre as an allocation within the emerging Plan in accordance with the above. We would be happy to discuss this site in further detail if required.	those sites at the Regulation 19 stage. Also, that the Council considers that the existing site portfolio is sufficient to meet identified needs, including for housing and business space. The site submissions will be considered in any subsequent Local Plan review, which the NPPF requires to be undertaken every 5 years.	
	-	General	I feel that one of the overall problems is the fact that future co-ordinated development is likely to be undermined by the fact that as the Lewisham Planning Dept. Officers, you are mainly dependent on Developers coming forward with proposals to build on private land, without any commitment to the wider vision that you have for the future of the Borough to 2040. This makes it difficult to stick to any holistic aim of improving and recreating better builds and encouraging housing that is affordable, appropriate in character, and able to contribute to desirable local improvements in the environment and infrastructure, in character with or positively complimenting the style of the predominant areas of Victorian and Edwardian build in Lewisham. The ability to require certain standards and the payment of CIL monies to pay for elements of infrastructure on individual sites, while positive, is then a 'post hoc' or isolated element, if you are unable to plan broadly, considering issues like air quality from increased traffic on major routes, maintaining or improving green space, considering public transport access, the costs and need for infrastructure required for a rising population over a larger area. Question- Is there dedicated government finance resources for Housing that allows the Borough to build without largely depending on Private Developers? I pose questions below about two sites to see how planning is working together with current local development.	Noted. The Local Plan forms part of the statutory development plan for Lewisham. It provides the development and investment framework to support the delivery of the spatial strategy and the key priorities of the Council's Corporate Strategy, and provides the framework to direct new investment within the borough, whether that is from private or public sector stakeholders. Whilst the Council does have access to grant funding through the GLA this funding is limited. It is also worth noting that much of the remaining developable land within	No change.

				the borough is owned by third parties – i.e. not in Council ownership. The NPPF encourages developers and private landowners to build sustainable development through the development management process. Furthermore the NPPF states that Local Authorities have to work proactively and constructively with third parties through the pre-application process.	
	-	General	Finally, the fact that this consultation has taken place during a pandemic and at a time of limited communication including an election period needs to be acknowledged. Further former consultation is required to achieve a common understanding of the plans and therefore, this consultation is inadequate.	Noted. The preparation of the Local Plan is being carried out in accordance with the Council's adopted Statement of Community Involvement. The Council received over 1,200 responses and thousands of comments through the Local Plan Consultation. When compared to other Local Plan consultations within London this represents one of the most successful.	No change.
	-	General	As a resident of Lee Green this is my response to the Local Plan. The plan needs to get away from Lewisham being a dormitory suburb and focus more on jobs and workspace. The Plan needs to be responsive to what community groups and residents want and be community led. Developer led is producing unhealthy unsightly developments. The Local Plan guidance for the development of areas such as Leegate needs to be clear. Tower blocks and higher density and more flats will not achieve strategic objectives involving better or healthier living nor will they make for a borough where people live their whole lives. Finally we live in a world where Covid won't go away and future plan's should include this and the resulting need for space and distance with outside spaces for people to relax safely, both young and old. The Lewisham Plan needs to be aware of the changes Covid is creating for our life style and include this in the Plan.	Noted. Part 2 of the draft Local Plan on Economy and Culture sets out proposals to grow and create an inclusive local economy, which supports the delivery of jobs and workspace across the borough. As part of the Local Plan preparation process, the public have been consulted in line with planning regulations and the Council's adopted Statement of Community Involvement. This ensures that community groups and residents have had opportunities to participate in the consultation throughout the planning process. The Local Plan adopts the London Plan housing standards, including for indoor and outdoor amenity space, and children's play space. It also sets out proposals to protect and enhance open spaces,	No change.

				including by addressing areas of deficiency in provision.	
	-	General	There are some positive ideas in the document that I hope can be followed through on. These are; - The preservation of the Bakerloo Line Extension – this is an important element for the future of Lewisham and South East. Making east transport inks - Cycle rout 1 and the pedestrian routes around North Lewisham making a better environment for people to travel about. The building of a pedestrian bridge over the railway at New Cross Gate would be a huge benefit for the local community, linking New Cross gate to Fordham Park. - Traffic calming is always a positive as long as it's not at the expense of local streets. Enhancement of Green Space	Support noted.	No change.
	-	General	If the Council genuinely wanted to encourage the involvement of residents (by definition, non-specialists) in the planning process it would make a real effort to publish material in plain English and eliminate repetition. It is disappointing that it has failed to do so. Rather than planning for homes that will help meet the problems of tomorrow, the document exudes complacency. It refers to a "strong record of housing delivery in Lewisham" based entirely on meeting national targets that have no reference to local needs. While meeting the "Decent Homes" standard for the majority of public sector households is good news, it should be noted that this is a very low benchmark. This level of complacency suggests there will be no change to current practices which is in itself a concern. The document makes barely any mention of sustainable development or housing with just one reference to climate change or the climate crisis. It may be that the likely continuation of home working is too recent a concept for this document but it is something that needs to be reflected in the final plan. We cannot carry on building rabbit hutches - the smallest homes in Europe. Meeting the minimum standard is not good enough.	The preparation of the Local Plan is being carried out in accordance with the Council's adopted Statement of Community Involvement. The draft Local Plan was informed through formal public consultation along with early stage engagement with the public, including on key evidence base documents, such as the Characterisation Study, New Cross Area Framework and Catford Town Centre Framework. A Summary Version of the Local Plan consultation document was also prepared. The Local Plan sets out a positive strategy for managing future growth and development across the borough, consistent with the Good Growth policies set out in the London Plan, and the principles of sustainable development set out in national planning policy.	The Local Plan has been reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan has also been prepared.
	-	General	- I am writing this email because the consultation process using Commonplace is badly designed – it uses terms without clear definition, it asks for residents to simplify all responses to coloured faces and at the same time presents a complex array of proposals, statements, visions, objectives and principles.	Noted. The preparation of the Local Plan is being carried out in accordance with the Council's adopted Statement of Community Involvement. The Commonplace website provides multiple tools / opportunities for the public to have their say. This includes sliding scales (for approval or disapproval), comment boxes for detailed written comments, and an interactive map. Responses can also be sent by email or letter.	No change.

	-	General	Technical or presentational errors are present in Section 3 of the DLLP where Site Allocations 1 ,2, 3, 4, 5, 6, and render those portions difficult to interpret because of inexplicable errors in labelling of street names. These errors are numerous and occur in the both the diagrams and supporting narrative on pages of the report from pp698-711. Any reader of the report is left without certainty about what statements the author of those sections intended to make. The errors are not minor and are substantive to the point of rendering these sections unreadable and almost impossible to interpret accurately.	Noted. The Regulation 19 document will be accompanied by a policies map which will demark the site allocations, and will ensure the sites are identifiable on an Ordnance Survey map. For the site allocation maps, the Council will review the maps to ensure accuracy of information.	Base mapping for site allocations amended to use latest OS data mapping.
	-	General	I am a co-author of the response to the Draft Lewisham Local Plan made separately in the name of the Forest Hill Society on this matter. This portion is substantially identical in both submissions and should be read in conjunction with **Appendix B – Aircraft Noise: Principal Roles and Functions: Lewisham and ICCAN.** This issue and the associated noise pollution directly and significantly impacts all co-located wards in West and South Areas and I include this portion in my submission for completeness. The Council is invited to enhance the Draft LLP by adding a new initiative that adopts a fresh approach, now replicated in other London Boroughs. This adds new processes and proposals to address a problem issue that does not always gain significant prominence except for those directly under the flight-paths – the often overbearingly intrusive noise generated by aircraft in poorly designed flight paths over the Borough of Lewisham. This new element to the Draft LLP will result in improvement of the Council's ability to comply with The Environmental Noise (England) Regulations 2006 (as amended). This requires Noise Action Plans for much of Greater London to include provisions that aim to protect any formally identified 'Quiet Areas' from an increase in road, railway, aircraft and industrial noise. We specifically request that the Borough include policies in the LLP that engage directly with flight path planning proposals and periodic airport and airspace planning consultations. In addition, to support and inform its planning and participation on noise and flight path issues we propose that the Borough joins and exchanges information with the Heathrow Community Noise Forum (HCNF), London City Airport Consultative Committee (LCACC), No Third Runway Coalition and the Aviation Environment Federation. By doing so, Lewisham can positively monitor and engage in how Air Space is designed and used over the borough. A major portion of the Air Space over the borough has a double overflight issue whereby inbound aircraft to London Heathrow Airport (LHR) and London City Airport (LCY) overfly one another's flight paths at heights between 2,000 and 5,000 feet. Consequent aircraft noise intrusion is doubly excessive and impacts directly and negatively on residents, health and well-being and additionally furthermore diminishes residents' enjoyment of open spaces. The Independent Commission on Civil Aviation Noise (ICCAN) recognise that there is increasingly robust evidence on the effects of aviation noise on health and quality of life, as well as on cognition and learning in children. Please see **Appendix B – Principal Roles and Functions: Lewisham and ICCAN.** They also assert there is a need for aircraft noise pollution to be considered a priority in planning policy and regulation so that these challenges can be better addressed.	Noted. London Plan policy T8 (Aviation) sets out policies addressing this matter. It is not considered necessary to duplicate these strategic policies in the Local Plan. The London Plan sets additional policies for minimising and managing noise across the Borough. For example Policies D13 and D14 provide policies aimed at improve health and quality of life, residential and other non-aviation development proposals.	No change.

			Furthermore, communities living under flight paths may experience excessive and prolonged exposure to aircraft noise, so there is a need to use measures that effectively mitigate noise pollution for affected communities. The Society feels it is important that the Council maintains capability, heightens its awareness and readiness to monitor, understand and respond to Air Space Design matters. This should be done with a holistic view about how the Air Space is being used by London airports and of the environment and noise issues that arise from that use. In particular, how those factors can be managed and their impact mitigated must be included in and map into objectives defined in the Draft LLP. Horniman Museum and Gardens, Forest Hill, London SE23 3PQ is one prime example of high-quality open space that is seriously affected by low flying aircraft and consequent noise pollution. It lies under the 400m wide corridor for inbound aircraft to LCY. Aircraft fly over the hill at some 1,600 to 2,000 feet and at that height, aircraft noise interrupts and halts all conversion between visitors. Amongst many other key sites and open spaces, many local schools across the borough are also under this same flight path and endure the same levels of noise pollution. The Society has worked for the last two years in developing an evidence-based campaign to challenge how our neighbouring airports design and operate their flightpaths within our airspace. In doing so it has presented to elected members of our Council, co-ordinated with the help of Cllr Leo Gibbons and has consulted closely with local MP Ellie Reeves, Cllr Sophie McGeevor, Cabinet Member for Environment and Transport, and GLA member Len Duvall. All have been very participative and proactively support efforts on matters such as aircraft noise pollution, air-space redesign, environmental pollution and continue to engage alongside the Society's efforts. MPs Vicky Foxcroft and Janet Daby have also expressed support. The real issue here is that with genuine commitment some resolution can be achieved by better design being applied to the use of Air Space and flight paths through it with particular focus being brought to improved flight dispersals and significant respite from overly intrusive, repetitive aircraft noise being inflicted on residents.		
	-	General Online info sessions	The disappointing thing was four recurrent themes raised every time there was a difficult question: The Government have cut our money so we have insufficient funds. We have to be Developer led. High Rise Housing is the be all and end all of the Plan as Targets have to be met. We were the first Council to sign up to Climate Change.	Noted.	No change.
	-	General	Before I comment specifically; the thought occurred that the whole sequence of Plans is back to front. There should be a Borough Consultation to draft the Lewisham Local Plan based on what people want to see happen in the next period of years. It should not be up to Officers or Councillors to push their own Agenda for comment without this evidence. This together with other London Boroughs Plans should form the basis of the London Plan. How can a proper independent Plan reflect the real concerns of Lewisham citizens? be done? There is no leeway. The London Plan having been signed off, determines what happens with all other Plans, constraining whatever other important concerns people may have. The National Plan should also be determined by the issues raised in Local Plans, not imposed; thereby stifling debate. This is clearly not able to be addressed this time round, but in my opinion merits future consideration.	The preparation of the Local Plan is being carried out in accordance with the Council's adopted Statement of Community Involvement. The draft Local Plan was informed through formal public consultation along with early stage engagement with the public, including on key evidence base documents, such as the Characterisation Study, New Cross Area Framework and Catford Town Centre Framework.	No change.

				The Local Plan is legally required to be consistent with the National Planning Policy Framework and in general conformity with the London Plan. The NPPF is set by the Government.	
	-	General	We are on the Boundary with Greenwich Borough and therefore greatly affected by what happens there. There is such disparity between Lewisham and Greenwich. We are also affected by TFL's actions. It is apparent that there is little cohesive thought about impacts of the separate actions by any of these bodies. At times, it feels as though we are the forgotten part of Lewisham. We have lived in our current accommodation for 45 years! You would think that we had a voice but no; constantly told what is best for us, like naughty children. I have walked and run the Borough, cycled for a long time to and from work. This was because train and bus were unhealthy crowded nightmares, (no change there)! I learnt roadcraft cycling, sadly lacking in today's new 'cyclists '. You have to take precautions, ensure that your bicycle has bell, working lights and you can be seen in the dark. The concept of Walking and Cycling requires personal responsibility and consideration as much as vehicles. If someone wants to race, do it at a Velodrome or Race Track. This leads me to the point that if you have a Cyclist's Charter in the Local Plan, you also need a Pedestrian one. The first mode of transport is walking and yet our pavements are in need of repair, they are obstacle courses. Signage is out of control. It is often in the wrong place. The recently installed cameras and signs restrict the pavement space even more. The plethora of signage and street furniture ranges from cabling cabinets, phone masts, CPZ posts, bollards, planters, bus shelters, five types of refuse collection bins, (including commercial bins) Estate Agent Signs protruding at head height over pavements. Add the indiscriminate dumping and vehicle parking, including 'allowable CPZs'and a Pedestrian's lot is not a happy one. This is even worse for someone with impaired sight or difficulty walking! Yet we are told this a Healthy Neighbourhood?	The promotion of walking, cycling and use of public transport are central to the Local Plans ambitions and policies and are set our clearly in policy TR3 Healthy streets as part of healthy neighbourhoods. The supporting Transport Strategy and Local Implementation Plan (LIP) outlines how the Council will work with TFL and other key stakeholders to assist with delivering the outcomes, policies and proposals within the London Plan, the Mayors Transport Strategy and the Local Plan. The document also sets out details of local priorities and targets including improvements to local streets.	No change.
	-	General	This Plan may not affect me in my remaining Lifetime, but there is very little to commend it in addressing the concerns, needs and aspirations of future generations. Maybe not sufficient people care? We seem to be in a very selfish materialistic Age. Sadly, as I have been told before, Planning Decisions seem to lack the People factor being conducted behind closed doors and forgetting about the adverse impact on people, swayed by Digital Architects' plans; although to be fair we owe a Debt of Gratitude to a few Officers in the Past who remembered what it is to be human.	The Council's adopted Statement of Community Involvement sets out how the public will be consulted on the preparation of planning policy documents and guidance, as well as on planning applications.	No change.
	-	General	The document is enormous and very un-user friendly and so vague in places that it is hard to critique and worded so developers can interpret the LLP in a way that will allow for maximum profit.	The new Local Plan will update and consolidate 4 adopted local plans into a single document. It has been professionally desktop published with interactive links to make it easy to navigate. The National Planning Policy Framework requires that development viability is considered through the plan process. A Viability Assessment has therefore been prepared as an evidence base document.	Local Plan reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan will also be prepared.
	-	General	Over all I feel the sheer rambling mass of the LLP is a strategic invitation for irresponsible building projects that will not benefit or enhance the area. They prioritize short term gain over investment in communities. Work expansion opportunities are ignored in favour of house building. There is no vision	The emerging Lewisham Local Plan went through a robust planning process, in line with the requirements set out by national	No change.

			of Lewisham as a community where residents might truly live and work beyond the basic live/work units highlighted in North Lewisham. Retail and new green technological industries are largely ignored. The New Cross Road in the plan will remain an awful place to inhabit emitting dangerous levels of toxicity until diesel and petrol cars are outlawed. No level of town plan tinkering can radically change this. With vision North Lewisham, with its industrial spaces could be a generator Urban clean energy and benefit from the plethora of green investment presented by Politicians from both sides of the spectrum to varying degrees of effectiveness. Another document could have challenged the inconvenient truth about New Cross in particular, that it is the waste dumping ground of London and instead be a leader in green energy generating technology via solar and wind, directly supporting the drive to make London Carbon Neutral. This level of ambition is disappointingly absent from the LLP. The New Millwall Stadium could itself be a generator of solar power with awnings for the stands lined with solar panels, generating clean electricity for the community. With ideas like these New Cross Gate and North Lewisham could lead the way in the green energy revolution.	and regional planning policy and legislation. The Regulation 18 consultation provides an opportunity for the public to comment on the plan proposals, including the borough-wide and character area visions. The Local Plan sets out a positive strategy for managing growth and development in the New Cross Area, consistent with the Good Growth policies set out in the London Plan. This includes detailed requirements around sustainable design and climate change adaptation / mitigation on a development and area-wide basis. For example, it seeks to develop a decentralised energy network in the north of the Borough.	
	-	General	I am writing in response to the Lewisham London Plan, which lays out the wide-ranging set of possibilities for the area. The document is enormous and very un-user friendly and so vague in places that it is hard to critique and worded so developers can interpret the LLP in a way that will allow for maximum profit. In response to these difficulties I am choosing to concentrate on the proposals for my neighborhood New Cross Gate, and how the LLP impacts this area in particular.	The new Local Plan will update and consolidate 4 adopted local plans into a single document. The National Planning Policy Framework requires that development viability is considered through the plan process. A Viability Assessment has therefore been prepared as an evidence base document.	The Local Plan has been reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan has also been prepared.
	-	General	In Summary, Not Ambitious Enough Over all I feel the sheer rambling mass of the LLP is a strategic invitation for irresponsible building projects that will not benefit or enhance the area. They prioritize short term gain over investment in communities. Work expansion opportunities are ignored in favour of house building. There is no vision of Lewisham as a community where residents might truly live and work beyond the basic live/work units highlighted in North Lewisham. Retail and new green technological industries are largely ignored. The New Cross Road in the plan will remain an awful place to inhabit emitting dangerous levels of toxicity until diesel and petrol cars are outlawed. No level of town plan tinkering can radically change this. With vision North Lewisham, with its industrial spaces could be a generator Urban clean energy and benefit from the plethora of green investment presented by Politicians from both sides of the spectrum to varying degrees of effectiveness. Another document could have challenged the inconvenient truth about New Cross in particular, that it is the waste dumping ground of London and instead be a leader in green energy generating technology via solar and wind, directly supporting the drive to make London Carbon Neutral. This level of ambition is disappointingly absent from the LLP. The New Millwall Stadium could itself be a generator of solar power with awnings for the stands lined with solar panels, generating clean electricity for the community.	The Regulation 18 consultation provides an opportunity for the public to comment on the plan proposals, including the borough-wide and character area visions. The Local Plan sets out a positive strategy for managing growth and development in the New Cross Area, consistent with the Good Growth policies set out in the London Plan. This includes detailed requirements around sustainable design and climate change adaptation / mitigation on a development and area-wide basis. For example, it seeks to develop a	No change.

			With ideas like these New Cross Gate and North Lewisham could lead the way in the green energy revolution.	decentralised energy network in the north of the Borough.	
	-	General	**Consultation Process** Thank you for giving us the opportunity to engage with the Council's draft local plan. I have been trying to grapple with the 872 page document for a long time now. Not an easy task for anyone, let alone those of us not accustomed to Council-speak! I did attend one of the zoom meetings about my local area, but felt that it didn't offer any real discussion, just a repeat of what was written. Your website asking for feedback proclaims: 'providing your feedback can take as little as 15 minutes'. May I say that this is a rather preposterous claim, as it obviously omits any time needed to read and digest the very long draft, let alone compose a response to it! I am afraid that the whole consultation process is more of a tick box exercise that will have failed to connect with and get feedback from the vast majority of the residents in the Borough, and yet will be treated as though it had. I have lived in Lewisham for most of my 44 years in London, since I came here as a Goldsmiths student in 1976, and have been at my current address in Forest Hill for the past 34 years. Overall, I think the Local Plan seems to be headed in the right direction. However, I am particularly concerned that the natural environment in the Borough should be given greater weight. I recognise that this is just one aspect of the plan as it stands, but the attitude taken to the importance of the natural environment will inform much of the other industrial, residential and infrastructure development. I feel best qualified to comment on what I know, which is mainly in my local area and from my work as a conservation volunteer and hope that you find the following comments useful.	The preparation of the Local Plan is being carried out in accordance with the Council's adopted Statement of Community Involvement. The draft Local Plan was informed through formal public consultation along with early stage engagement with the public, including on key evidence base documents. The Local Plan broadly recognises the value of the Borough's natural assets and network of green infrastructure, and includes policies which support the protection and enhancement of natural environment assets. For example Part 2 Policy GR and CI.	No change
	-	General	In the feedback meetings it seems that you have already decided what good looks like and spent all of your time explaining why the draft vision is the answer. It wasn't quite clear what the question was. Has this whole exercise been a simple tick box exercise so that you can theoretically claim that you have true consulted?	The online information sessions held by the Council supported a Regulation 18 stage public consultation on the emerging Local Plan, which is required in line with planning law. The consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement.	No change.
	-	General	1. I do not believe the consultation has been properly publicised, considering its significance. As a resident of Rushey Green I have in recent months received two colour leaflets about the Lee Green Low Traffic Neighbourhood temporary proposals, but as far as I am aware not one dedicated piece of literature about this consultation. Why Lewisham Council has spent pubic money on a direct delivery about temporary traffic changes in Lee Green for Rushey Green residents, but not communicated about its long terms plans for Catford to Catford residents is baffling. 2. I believe there has been a long term trend of poor consultation by Lewisham Council about developments in Catford. As an example the image and information about the future of Catford on the windows of the former WHSmith store in Catford is incredibly misleading, providing no information about possible 20 storey buildings. 3. Lewisham Council have failed to provide feedback about the failure to implement past planning decisions to local residents - such as restoring a much needed pedestrian bridge from Doggett Bridge. I have never received as a local resident any formal council communication on this issue.	The preparation of the Local Plan is being carried out in accordance with the Council's adopted Statement of Community Involvement. The draft Local Plan was informed through formal public consultation along with early stage engagement with the public, including on key evidence base documents, such as the Characterisation Study, New Cross Area Framework and Catford Town Centre Framework. The Low Traffic Neighbourhood scheme is outside the scope of the Local Plan. However it is one of the measures the Council is exploring and trialling to support modal shift,	No change.

				in line with the London Mayor's Transport Strategy and the Council's Local Implementation Plan. At its meeting on 16th September 2020 Mayor & Cabinet agreed the transfer of S106 funding originally proposed for the delivery of a footbridge between Doggett Road and the Barratt's development on the former Catford Greyhound Stadium site to be used to deliver a programme of public realm and accessibility improvements to Catford Station areas. This includes looking at options to provide step free access at Catford Station. See M&C report for further details.	
	-	General	In order to support intensification of housing development The Local Plan must set out details as to how it is going to support low carbon emissions in the area, promote positive health for the residents, address public transport infrastructure, maintain and develop green spaces, promote community resources such as access to retail and hospitality, access to local health services, access to schools. I would like all these areas to include in the Local Plan alongside guidance for future housing developments. Additionally, intensive housing developments take a number of years for completion, I would like the Local Plan to include how it will reduce the negative impact of construction on the residents living in the areas including noise and dust pollution during construction.	The Local Plan broadly reflects the matters raised and sets the framework to support the delivery of Good Growth, in line with the London Plan. The Part 2 Policies on Sustainable Design and Infrastructure set out approaches and policies to address the climate emergency, and support the aim of reducing carbon emissions to help Lewisham become a net zero carbon borough.	Local Plan amended with additional policy on 'considerate construction' to help protect local amenity.
	-	General	My name is [name removed] and I am a chartered architect, Passivhaus Designer and Retrofit Coordinator. I have been a Lewisham resident since 2016. Having reviewed the response to the consultation submitted by Climate Action Lewisham, I support the frustration with the weakness of terminology used to describe the Council's approach to dealing with the Climate Emergency.	Noted. The Local Plan sets the framework to support the delivery of Good Growth, in line with the London Plan. Resending to the Climate Emergency is one of the key strategic objectives of the plan. The Part 2 Policies on Sustainable Design and Infrastructure set out approaches and policies to address the climate emergency, and support the aim of reducing carbon emissions so that Lewisham becomes a net zero carbon borough.	No change.
	-	General	Dear Lewisham planners, as someone has lived in the borough of Lewisham all my life, I'm taking this opportunity to comment in what has been and hopefully influence a bit of what is to come in this plan. I really feel that some of the planning decisions in the post war period has had a desperate effect on the lives of the people in this borough.	Noted. The Local Plan sets out a positive strategy for managing future growth and development across the borough, consistent with the Good Growth policies set out in the London Plan, and the	No change.

			There was a desperate lack of appreciation for all the old buildings which were too readily bulldozed and replaced with cheap and nasty flats which in turn created massive social problems in virtually every corner of the borough. Old pictures of every high street in the borough are readily available and you look now and it looks like they've almost been deliberately trashed. Almost everything from shop fronts, buildings, lampposts, roads and kerbs, bins, just everything has just led to once beautiful and proud streets turning into a complete eyesore. The council planning dept. should take responsibility for all of that frankly. It's as if they don't care about the look of the place and the way communities were broken up and areas replaced with the construction of vast featureless flats was a major mistake. The documentary 'the secret history of our streets 'on the BBC focusing on Deptford high street said it well and the one street that didn't get bulldozed, Albury is now full of Million pound homes. Lewisham council bulldozed street after street of homes like that and replaced them with concrete ghetto's. I think we all deserve an apology frankly. That was replicated all over the borough, find me a high st that looks better today than it did 100 years ago and frankly anything anywhere in the borough. Lewisham council has frankly trashed the place when with proper planning and using the powers at its disposal it could have done so much better. I know the population has expanded massively and again facilities have not kept up with the expanding population. If you build 24 000 new homes you need 24000 of lots of other things too. Schools, hospitals, doctor's surgeries and all the other essential services. You also need to think about roads. Lewisham idea of catering for the parking needs of its population is to make it so difficult to park and drive around the place that people get sick of having a car but that doesn't improve people's lives one iota. The roads in Lewisham are desperately congested so if lots of new homes are not going to be populated by car less people, what provision will there be? It seems to me that generally Lewisham council provides nothing with all its new housing and just lets motorists just have a harder and harder time. When you look at how life used to be in this borough, I think we need to look back frankly. So many beautiful buildings have been lost but could be built again. Houses and blocks could be built with the same decorative features around the windows and doors as all the others, how is it allowed that they are not???? Lewisham council has ok'd so many diabolical developments and also the bulldozing of so much beauty. It really is quite upsetting when you look at pictures of how the place did look and should still look. I go to Italy quite a lot where they preserve all their old buildings and architecture. If people had done what the Lewisham council planning dept. had done over there, they'd all be arrested frankly for desecration. Anyway with a long term plan now being created please try and do the following. - Preserve the old buildings and only grant planning permission for developments that are appropriate for a street or an area.	principles of sustainable development set out in national planning policy. The Local Plan broadly advocates and seek to deliver character-led growth, ensuring new developments respond positively to the historic, social/cultural, built and environmental character of Lewisham. The Local Plan is supported by an up-to date Infrastructure Delivery Plan. This helps to ensure that appropriate provision is made to support the proposed growth sets out in the local plan. Noted. The photos included in the draft Local Plan are provided for illustrative purposes only and do not carry material weight for planning decisions. As the plan is progressed through the next stages of the process, the Council may take the opportunity to update these, subject to resources available.	

			- Try and beautify our high streets perhaps bring back some old features and make them places we can be proud off. Look at the old photos and try and recreate the beauty of them. -Build sufficient essential services around any new developments and provide enough parking for people who will inevitably have vehicles. - Target areas that have been devastated by diabolical developments and give them special attention. I actually grew up In Sydenham though I've lived in Brockley for 40 years. The junction of Dartmouth Road and Kirkdale almost sums up the situation perfectly. A once grandiose parade of shops with beautiful features is now such a sad mix of everything bad about planning in Lewisham. It makes me want to weep every time I pass. They should be lots of little craft shops but some have been made into a homes so the shop front ripped off and a front door put in, totally out of keeping with the parade of shops, how was that allowed to happen. A block of post war flats built in the parade of shops, how was that allowed to happen? Boarded up shops, old pubs converted into estate agents and just everything a mess. Who cares about this area and what happens design and planning wise? Who is responsible for what developments are allowed and what is the plan? It seems to me that no one cared about that area of Sydenham one bit and there has been no planning or vision at all. That has been replicated all over Lewisham with the council just allowing street after street to just get trashed with shoddy developments and constructions with zero appreciation for architecture what so ever. I blame the council for it all frankly and I'm not at all sure the planning department is fit for purpose, why get an institution that has routinely trashed the place to design what happens next? I am very happy to have a massive provision of affordable housing, we need it desperately and if it was me I'd bring back rent controls frankly but whilst providing as much affordable housing as possible try to make the place somewhere nice to live in too, your sincerely		
	-	General	The Local Plan must • Ensure robust delivery of improved air quality and steps to actively reduce (not just slow the growth of) traffic levels, traffic congestion and pollution caused by traffic that impacts on local residents, particularly children. Priority should be given to low carbon and public transport modes promoting health through walking and cycling along safe routes. Any developments must offset any additional carbon they generate so the is no increase in the carbon emissions generated in the borough.. • Be robust in protecting local heritage and neighbourhood character so buildings are at a scale similar to the buildings in their vicinity and buildings on a human scale. • Protect and enhance existing green space including parks, cemeteries and nature reserves. • Deliver homes that people need, not what developers want to provide and reduce dependence on the private rented sector by improving access to homes people can afford. • Take account of how travel demand is likely to change following the Covid-19 pandemic as it is likely that fewer residents will travel to work in zone 1 each day accepting that the level of this change is not known at the current time • Encourage quality, sustainable jobs and apprenticeships rather than insecure "gig economy", zero hour jobs. • Not promote fast food or bookmakers' or similar gambling premises.	Noted. The Local Plan sets a vision and objectives for the Borough that are aligned with the principles of sustainable development in national planning policy and the Good Growth policies of the London Plan. It provides a framework to enable modal shift and improve air quality, in the context of the London Mayor's objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. This is embedded in the Healthy Streets policies set out in Part 2 Transport and Connectivity section. The Local Plan provides a policy framework to address climate change issues across the borough, in line with the London Plan policies. For example, Part 2 Policies on Sustainable Design and Infrastructure.	No change.

				In addition, the Council's Climate Emergency Action Plan (2020) sets out actions required by the Council and other stakeholders, including national Government to address climate change. Policies concerning the protection and enhancement of heritage assets and open spaces including parks, cemeteries and nature reserves are included in the Local Plan. The plan includes policies to address the harmful overconcentration of hot food takeaways and betting shops, however recognising that permitted development rights will limit the Council's control over certain uses.	
	-	General	The idea of having a 'vision' is superb. However, it is equally important that it have the teeth to protect it. If people do what they like anyway, as they do now, there is little point in this expensive exercise. There are many, but I will choose one recent example: - 107 Jerningham Rd Telegraph Hill has recently and very egregiously flouted Planning rules and yet is not being chastised at any level. The household was aware of the planning rules of the conservation area, yet deliberately went ahead anyway, (not far different from putting up the middle finger to the council). They have not even been fined. If this is the way to go forward, then why spend money on a comprehensive scheme like this, if it is to merely become a farce? In other words, without adequate legal backing, planning issues become mere hot air and some time-wasting entertainment for a few. If you can get the teeth to back the ideas, that would be good and probably essential.	The Council is required by the Government to prepare a local plan which sets out a long-term strategy for the use and management of land in the borough. Once adopted, the Local Plan will form part of the Council's statutory development plan and have full material weight in planning decisions. Planning enforcement is outside the scope of the Local Plan.	No change.
	-	General	6. The Mayor of London appears to have little vision, imagination and credibility, as he tries to make the right sounding headlines, hoping that people cannot see through the hot air. London must not be ruined to satisfy headlines. There is no point in building flats to fill a quota, that may well be out-of-date a few years down the line. We have the example within our lifetimes, of the brutalist monsters that were built during the 1960s with no proper thought and proved to be a disaster and had to be demolished within a few years. Working practices are changing and absurd 'quotas' for dormitories have to be revised.	The Local Plan is legally required to be in general conformity with the London Plan. The Council is required to review its adopted Local Plan every 5 years, and consider the need for changes based on monitoring and new evidence.	No change.
	-	General	8. Lastly, we have situations where outside powers affect local decisions arbitrarily like with the destruction of our best gourmet pub, The White Hart, in New Cross Gate. Awe have had years of seeing our parade fall into decay and dereliction due to a) Sainsburys destroying all our local shops (14 in all, with the lives of 60 people affected) and b) The Red route , that destroyed what was left by eliminating parking.	The Local Plan sets out a positive strategy for managing future growth and development across the borough, consistent with the Good Growth policies set out in the London Plan, and the principles of sustainable development set out in	No change.

			This led to the loss of BARCLAYS BANK, as it could not attract enough trade that brought in the money, like insurance sales and mortgages. People need to spend time to discuss these sorts of issues. With no parking and the temporary parking removed on Pepys Road, the bank was unable to have viability with none other than a cashier and an ATM. The list of losses is endless. Now, after a group of young people fought hell for leather to create the first new shoots of life on our (New X Gate) parade for years and years, building up the WHITE HART into a successful and pleasant place, of which we have NONE other, permission has been granted to destroy it! Why are people who have no local knowledge of our needs allowed to affect our lives in this way? This has to be stopped somehow. We rely on you to defend our area. That is why you are elected, that is why you are in the councils. Please do not ignore the needs of local communities.	national planning policy. It is being prepared taking into account local evidence of needs (such as for housing, workspace, green and open space, and infrastructure). The Council is preparing the Local Plan through early-stage engagement and multiple rounds of formal public consultation to help ensure the plan reflects the aspirations of local communities and other stakeholders.	
	-	General	Although there is much to commend in the draft plan in terms of the background research and information that has gone into its preparation we are concerned that the issues identified are not necessarily being carried forward properly into policies and actions and specific projects.	It is considered that the Local Plan has been robustly prepared, informed by evidence and responds to the main issues identified. The Local Plan must be in general conformity with the London Plan and consistent with national planning policy. The public consultation provides an opportunity for additional issues to be identified, along with a review of the preferred policy approaches. Feedback will be considered and inform preparation of the Regulation 19 stage plan.	No change.
	-	General	Too much of the plan is predicated upon accommodating residential unit building to the detriment of employment, open space, traffic, transport, climate change impacts and supporting community facilities.	The Local Plan seeks to deliver Good Growth and sustainable development as highlighted in the National Planning Policy Framework and the London Plan. The London Plan sets a strategic housing target for Lewisham and the Local Plan must demonstrate how this will this will be met. In addition, the plan addresses how other needs to support growth will be accommodated, such as for green infrastructure and community facilities.	No change.
	-	General	We are totally aware that the Plan has to be in conformity with the London Plan and with the housing need methodology imposed by central government but the continued assumptions around 'london has to grow at all costs' as it is the economic driver of the country is at odds with the present government supposed initiatives to send more government departments out to the regions and to focus on the 'left behind' areas of the country. The plan remains based upon a predict and provide model which would appear to have shaky foundations.	The Local Plan seeks to deliver Good Growth and sustainable development as highlighted in the National Planning Policy Framework and the London Plan. The London Plan sets a strategic housing target for Lewisham and the Local Plan must demonstrate how this will this will be met.	No change.

				National planning policy and legislation require that the plan seeks to address identified needs, including for housing, commercial and town centre land and uses, and green infrastructure, along with other types of infrastructure to support the levels of growth planned.	
	-	General	Although the Covid pandemic is mentioned, there is no mention of Brexit and the impacts of both these things on population growth or possible decline, patterns of work and how these might change, the accelerated change to on line shopping etc. and what these changes might mean in terms of our high streets, traffic, transport , the demand for larger housing units to accommodate home working, the possible demand for more hubs for click and collect (or even encouraging these as a way of reducing the number of delivery vehicles on our streets), the increased pressure and impacts on our open spaces that the pandemic has caused. I could go on.	Noted. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues The Council is required to review its adopted Local Plan every 5 years and consider the scope for changes informed by monitoring and new evidence. The review process will allow for consideration of the longer term impacts of Covid-19 and Brexit.	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections.
	-	General	As someone who lives, works, parents, shops and goes out in Lewisham I wanted to thank you all for putting together the Draft Local Plan. It clearly seeks to address many of the challenges faced by the borough but whilst I applaud this intention, unfortunately it also appears to me to fall short of the ambition necessary for Lewisham to flourish in the coming decades. Overall the plan seems too wedded to historic attachments to car dominant transport and cheaper, energy intensive ways of building. As such, it seems to me to fall short of the comprehensive vision for a cleaner, healthier borough which would allow all residents to flourish in the 21st century.	Noted. The Local Plan sets a vision and objectives for the Borough that are aligned with the principles of sustainable development in national planning policy and the Good Growth policies of the London Plan. It provides a framework to enable modal shift and improve air quality, in the context of the London Mayor's objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. This is embedded in the Healthy Streets policies set out in Part 2 Transport and Connectivity section.	No change.
	-	General	First, I would like to express my dissatisfaction that the council continues to encourage comments using Commonplace, as this platform has been used so too times and is not accessible to all residents. It gives the impression to residents that the council is more concerned to manage expectations than to engage in meaningful dialogue. To residents, it is easy to get the impression that Commonplace is a default tool for consultation, it appears to have been over used to the extent that there is a sense in the community of commonplace fatigue. This makes the consultation appear at best a tick box exercise and at worse a cynical attempt to exclude the community from meaningful engagement by nudging respondents. Therefore, I am sending in further comments, via this mailbox as I think there	Noted. The preparation of the Local Plan is being carried out in accordance with the Council's adopted Statement of Community Involvement. A Summary Document of the draft Local Plan was also prepared to aid the	No change.

			are issues which require further consideration in the plan making process and not just summaries of responses disaggregated from comments on maps. Which in my view has been designed to encourage respondents to develop very individualised responses rather than more deliberative approaches which really involve the community in plan making.	consultation and support engagement with the community.	
	-	General	Sadly, Covid 19 has rendered some of your thinking obsolete and the Lewisham Plan will have to be updated to reflect the new global and local reality (-also understanding that not only will this current pandemic last for an unknown number of further years, but that future pandemics are likely to become more common and planning now must take into account the need to mitigate against them. E.g. many more Lewisham residents are going to need to work from home in future. This makes developing new one bed flats obsolete as workers are going to need proper space in which to work as well as live and so one bed flats will not even offer sufficient space for single, solo households, let alone couples and families. *(In any case, the demand for homes in Lewisham is for 3 and 4 bedroom accommodation, suited to students, young sharers, families and home workers.)* And having access to copious amounts of safe green space (private gardens or new public parks) is going to be necessary for all. It's quite clear that the amount of space in Lewisham parks is woefully insufficient for the demand on it. It also means that creating great expanses of dormitory enclaves without neighbourhood employment, services and shopping will no longer meet the needs of society and will have to be banned. In fact, some say that the whole of Lewisham has been turned into a 'dormitory town', requiring the mass transport daily of huge numbers of people into central London or elsewhere to work and shop and exercise and access services. 2020 has shown this to be a health and safety risk….and that every person in Lewisham needs to be able to walk within about 10 minutes of their home to all of the things they need for a full and quality life. Planning for this kind of 'village life' within our city will protect health but also rule out the need for polluting and expensive transport every day and bring vitality to our local communities and economy. Benefits all round. Southwark borough with its far greater possibilities for Council to improve the quality of the local environment because they can gather business rates on a much greater scale than Lewisham's shows the folly of catering only for the development of 'sleep pods' and not a vital local business sector as well. (We note the current large scale planting of street trees across Southwark borough, their beautification of traditional Southwark streets by their mass upgrading of front garden walls with traditional railings, and the widely publicized current program of building 11,000 new Council homes in their borough. This is the kind of aspirational goal setting we need for Lewisham, to improve the quality of life of all who live and work here.)	Noted. The Lewisham Local Plan seeks to deliver Good Growth and sustainable development as highlighted in the National Planning Policy Framework and the London Plan. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19 and related issues. The spatial strategy for the borough focuses growth and enhancements within the borough's hierarchy of town centres. These centres will be the focus of activity and vitality for local neighbourhoods providing local employment and services.	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections.
	-	General	Your draft plan is weak when it comes to developers and you must be much more strongly prescriptive to developers and police what they do for the good of the borough and the communities that live here and expect better.	Noted. The Local Plan sets a framework to facilitate the delivery of sustainable development in line with national planning policy and Good Growth policies in the London Plan. The plan must be sufficiently flexible to allow for the consideration of site specific circumstances on planning decisions. Development viability is an important consideration.	Local Plan amended to provide more authoritative language where possible. For example, by stating that development proposals "must" rather than "should" or "will be expected to"; and replacing "will be resisted" with "refused".
	-	General	I can't find a single picture of the proposed high rises in the context of the new community space and surrounding houses. Can you direct me to this picture? Also, why is it not displayed as one of the stock pictures, it almost feels like you're trying to mislead the community.	The Council's planning webpages should be referred for further information on planning	No change.

				applications that have been submitted for determination by the local planning authority. This is not covered by the Local Plan, which sets policies against which planning applications will be considered.	
	-	General	What was learned from Lewisham because they've build thousands of flats but the area has not got any more diverse or evidence of being "regenerated".	The Local Plan does not address development that has previously been consented and built. The Local Plan sets out a strategy to improve the quality of Lewisham's neighbourhoods, including by making provision for housing to meet the London Plan housing target; the strategy has been informed by local and regional evidence base documents.	No change.
	-	General	What about infrastructure, the trains are busy as they are? There seems to be some statements that were asking Major of London and TFL for Bakerloo line, I mean if taking the hit of ruining the skyline and area with thousands of flats to get a good number of households off the housing list, what better bargaining power are we waiting for.	An Infrastructure Delivery Plan has been prepared alongside the Local Plan. This sets out the infrastructure required to support the levels of growth planned, with key projects signposted in the Local Plan. Development proposals will be required to contribute to the delivery of infrastructure, including through direct delivery and funding, such as the Community Infrastructure Levy. The London Plan commits to delivering the Bakerloo line extension, which the Local Plan supports recognising the wide range of benefits this can bring.	No change.
	-	General	An holistic approach to development in the borough. Transport, jobs and housing are all connected issues, and must be considered as such in all future developments. An holistic appreciation of these complex needs will help build resilient and sustainable communities for generations to come. Adjusting the plan to accommodate these points would demonstrate commitment to addressing the climate emergency and help build a greener, healthier and wealthier borough for all. As a borough with such a young demographic it is imperative that we consider future generations in all development policies by catering for the world they are due to inherit, not just the one we live in now.	Agree. The Local Plan sets the strategy for supporting and enabling Good Growth in Lewisham, in line with the London Plan. This is underpinned by a holistic approach taking into account social, economic and environmental considerations.	No change.
	-	General	Adoption of more ambitious and authoritative language. Though the sentiment of the plan is ambitious, it is undermined by consistently weak and ambiguous language, leaving far too much open for negotiation by developers whose priority will always be profit. If the plan is to genuinely work for the people of Lewisham, it must be revised to be more precise and definitive.	Noted. The Local Plan sets a framework to facilitate the delivery of sustainable development in line with national planning policy. The plan must be sufficiently flexible to allow for the consideration of site	Local Plan amended to provide more authoritative language where possible. For example, by stating that development proposals "must" rather than "should" or "will be expected to"; and replacing "will be resisted" with "refused".

				specific circumstances on planning decisions. Development viability is an important consideration.	
	-	General	General: Although there is much to commend in the draft plan in terms of the background research and information that has gone into its preparation we are concerned that the issues identified are not necessarily being carried forward properly into policies and actions and specific projects. Too much of the plan is predicated upon accommodating residential unit building to the detriment of employment, open space, traffic, transport, climate change impacts and supporting community facilities. We are totally aware that the Plan has to be in conformity with the London Plan and with the housing need methodology imposed by central government but the continued assumptions around 'london has to grow at all costs' as it is the economic driver of the country is at odds with the present government supposed initiatives to send more government departments out to the regions and to focus on the 'left behind' areas of the country. The plan remains based upon a predict and provide model which would appear to have shaky foundations. Although the Covid pandemic is mentioned, there is no mention of Brexit and the impacts of both these things on population growth or possible decline, patterns of work and how these might change, the accelerated change to on line shopping etc. and what these changes might mean in terms of our high streets, traffic, transport , the demand for larger housing units to accommodate home working, the possible demand for more hubs for click and collect (or even encouraging these as a way of reducing the number of delivery vehicles on our streets), the increased pressure and impacts on our open spaces that the pandemic has caused. I could go on.	Noted. The Local Plan seeks balance growth by ensuring that future development are aligned with the principles of sustainable development. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues. The Council is required to review its adopted Local Plan every 5 years and consider the scope for changes informed by monitoring and new evidence. The review process will allow for consideration of the longer term impacts of Covid-19 and Brexit.	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections
	-	General	I would also like to note that the proposal documents are completely inaccessible and all of the publicity images surrounding the wider plan are cropped deliberately to mislead local people into thinking that the redevelopment of the town centre is completely low rise in nature. This is a complete disgrace and no way to carry out a meaningful consultation with local people.	Noted. The preparation of the Local Plan is being carried out in accordance with the Council's adopted Statement of Community Involvement.	No change.
	-	General	I would like to make the following comments on the local plan which include viewpoints of the other members of the family. 1. You seem to make quite linear assumptions about population growth. As minimum you should prepare for alternative scenarios. My understanding is London's population has fallen sharply in the last year. Some of that could bounce back after covid but with Brexit and greater homeworking some trends could be persistent. You should avoid constructing a lot of low grade retail and residential properties which then become hard to occupy. Some sense of adaptability and plan flexibility would be useful. 2. In light of the above you should reflect harder on the residential density assumptions in the plan. The high rise buildings near Lewisham station have not been done sympathetically - high rise, ugly clashing colours and v close to each other. As a whole it compares poorly with the building around Kidbrooke station (though again the buildings nearest the station appear ugly and overly dense).	The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues. The Local Plan introduces new policy approaches to managing the development of building heights in the Borough, including tall buildings. Following the Regulation 18 consultation, additional work on the Tall Buildings Study will be undertaken, and this will be used to inform the next version of the plan.	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections. The Tall Buildings Study has been finalised. The Local Plan policy on building heights has been amended to take account of the study's findings.

	-	General	I am sending my comments directly to you to be considered together with all the comments and questions relating to the current Consultation on the Lewisham Local Plan before the Consultation deadline. Please add this to the community responses. I do not find it either easy or sufficient to enter comments into the Commonplace format as a Council Member representing Downham Ward, or as a Lewisham resident and I feel that the system needs to be revised to become more fit for purpose and to offer clarity rather than confusion. I will be mainly responding as one of the three Councillors on behalf of Downham Ward in this written format. I did attend three of the Zoom Consultation meetings on 4th, 8th and 9th March to gain an overview of what plans are being considered, for the East, South and the West Areas and have read in some detail the Local Plan documentation, generic discussion and specific details relating to both identified and unidentified sites in Downham Ward, and Sydenham Ward where I live.	Noted. The Regulation 18 consultation was carried out in accordance with the Council's adopted Statement of Community Involvement. The Council made clear that there were a number of ways in which comments could be submitted, and this was not limited to the Commonplace platform.	No change.
	-	General	Here is my contribution to the Local Plan consultation document. I am currently Chair of the Lewisham Biodiversity Partnership as well as Vice Chair of the Quaggy Waterways Action Group. I am also active in Park User Groups, have worked for Glendale, Social Enterprises in landscaping in Lewisham and have been Chair of the Ladywell Society and Lewisham Environment Trust in the past. I know a lot about Lewisham and have taken on this feedback as a private resident not on behalf of any group I volunteer for. My other colleagues will hopefully comment on the relevant parts. I am due to be online on Tuesday regarding the Green Infrastructure section. I hope you can navigate my responses. I have tried to make it clear what I am referring to	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
	-	General	I would like to place on record my support for the Grove Park Neighbourhood Forum response to the Draft Local Plan. The people of Grove Park have been at the forefront of Public Participation in Planning Lewisham since 1976. All previous draft plans since that time have been widely circulated, then discussed with Planning Policy Officers and local Councillors at locally organised Public Community meetings. The current draft proposals have been presented online, with comments invited online. This process excludes and disenfranchises anyone who, for whatever reason, is unable to present their comments online. I, myself, have attempted to engage with the online process. Despite being familiar with the format and having computer access, I have found it pretty impossible to have any meaningful input. As these proposals will shape the future of Grove Park for a generation, this can hardly be recognised as a valid Public Consultation. Could this be delayed, to allow for some in person presentations and discussions once Covid restrictions allow?	Noted. The Regulation 18 consultation was carried out in accordance with the Council's adopted Statement of Community Involvement. The SCI was amended to enable the Council to carry out public consultations during the Covid pandemic, in line with national planning policy and legislation.	No change.
	-	General	I have tried to navigate round your proposals. Find it not user friendly and full of planner jargon. These presentations alienate people and do not encourage participation. Am concerned that like the implementation of recent traffic calming, and road blocks that proposals are pushed through during lock down and a time of pandemic that means that communities and residents are not given adequate information time or proper consultation. This is not something that we would expect from a labour council. It is disturbing that such proposals are also farmed out to Commonplace to wrap up and present. Why can we not deal directly with our own borough council? Residents should all be included, and invited to comment which means clear maps and details on paper through all residents' doors to allow them to participate in a true consultation of their immediate neighbourhood and areas in the borough. That means including elderly residents and all racial groups, translations in all languages and include information for those who are not computer literate or digital users, or own computers.	Noted. The Regulation 18 consultation was carried out in accordance with the Council's adopted Statement of Community Involvement. To support the consultation, the Council carried out a series of online information sessions where the public were provided with opportunities to interact directly with Council planning officers. The Low Traffic Neighbourhood (LTN) scheme is outside the scope of the Local Plan.	No change.

	-	General	• I have concerns about “support” of development rather than preventing bad development. • There issues with general vague wording and conflicting policies = developers charter. • Lack of emphasis on green space provision is a major oversight. • Transport policy and shopping policies need a major rethink. • Infill development generally (esp. at corner sites) Article 4 directions.	The National Planning Policy Framework requires that Local Plans must set a positive framework for managing growth and development to meet identified local needs. The Council considers that the draft plan has been prepared in line with the NPPF. The Local Plan includes a dedicated section on Green Infrastructure, including policies which support the protection and enhancement of green and open spaces. The setting of Article 4 Directions are outside the scope of the Local Plan.	Local Plan amended to provide more authoritative language where possible. For example, by stating that development proposals “must” rather than “we expect” or “should” or “will be expected to”.
	-	General	I have listed my objections above to the Lewisham 2021 plan and need my objections officially noted.	Noted.	No change.
	-	General	5 - Adoption of more ambitious and authoritative language. Though the sentiment of the plan is ambitious, it is undermined by consistently weak and ambiguous language, leaving far too much open for negotiation by developers whose priority will always be profit. If the plan is to genuinely work for the people of Lewisham, it must be revised to be more precise and definitive.	The National Planning Policy Framework requires that Local Plans must set a positive framework for managing growth and development to meet identified local needs. The Council considers that the draft plan has been prepared in line with the NPPF.	Local Plan amended to provide more authoritative language where possible. For example, by stating that development proposals “must” rather than “we expect” or “should” or “will be expected to”.
Blackheath Society no 2	-	General	**Executive Summary** **Introduction** • Welcome comprehensive, consolidated single document • Welcome aspirations underpinning and driving draft policies • Salute efforts to create evidence base, inform and consult citizens (especially in difficult covid times) **But** • Too long and wordy (longer than new London Plan) and difficult to navigate. Poor cross-referencing. • Vision(s) and route(s) to it/them not sufficiently granular, specific and differentiated for Lewisham as a borough and for its unique character neighbourhoods (at least down to District town centres) • Too little time for consultation on current draft and subsequently (especially in difficult covid times) • No effort to value and reach out to amenity societies, who have great experience and local knowledge ▪	Noted. The Regulation 18 consultation was carried out in accordance with the Council’s adopted Statement of Community Involvement. The consultation period was well in excess of the legal minimum 6-week period. The length of the draft plan reflects that it will update and consolidate 4 adopted plans into a single document. Local community groups, including neighbourhood forums and amenity societies were invited to submit representations on the local plan, and a number of key evidence base documents informing the plan (such as the Lewisham Characterisation Study).	No change.

				The Council considers that the approach to the sub-areas of character areas (Part 3) provides a proportionate and more granular approach to planning at the local level. The consultation provides opportunities for the public to comment on and inform the sub-area visions and policies.	
Blackheath Society no 2	-	General	What is not included • Lack of guidance on weightings/priorities where there is conflict or trade-off between policies • Lack of clear idea of Lewisham's housing needs and priorities, independent of the London Mayor's • Lack of transparency, honesty and realism about what is within LBL's gift/control • Lack of baselines, milestones, measurable and granular articulation of vision (for Borough and for major neighbourhoods) and road map to it • Lack of detailed proposals in DM1 for engaging citizens, local communities and community groups (especially amenity societies) and involving them in delivering, monitoring, reviewing progress on the Plan • Lack of mechanism/timeline for flexing and adapting the Plan to their stakeholder views and a changing world (including population growth/movement), especially post covid and Brexit • Lack of detail on district centres, their benefits and requirements, and how they differ e.g. need a District Centre SPD or separate ones for each, including Blackheath and Lee Green, as masterplans for such areas ▪	Noted. Part 1 of the Local Plan sets out that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise, in line with planning law. This will be considered on a case by case basis. The Local Plan has been informed by technical evidence which sets out Lewisham's housing needs, such as the Strategic Housing Market Assessment. The plan's policies seek to respond to these needs, whilst also seeking to deliver on the borough's London Plan housing target. Part 4 of the Local Plan sets out the framework for monitoring the delivery of the plan over the plan period. Part 4 Policy DM1 of the draft Local Plan makes clear that a wide range of stakeholders, including community groups, will help to support the delivery of the plan. The Council is required to review the Local Plan every 5 years. The Council also reports on progress in the delivery of the plan annually through the Authority Monitoring Review process. Monitoring will be used to inform any necessary changes to the plan. Part 2 of the Local Plan on Economy and Culture sets out the town centre hierarchy and makes	Local Plan Part 4 Policy DM1 supporting text amended to include additional information on delivery of the plan.

				clear the role/function of different centres within it. The level of policy detail for each of the District Centres is considered proportionate for a strategic document. Policies are included in Part 2 and 3 of the plan.	
Blackheath Society no 2	-	General	• Very thorough and comprehensive. Maps closely on to London Plan. Good evidence base (e.g. Character Study 2019, Open Spaces Assessment (2019), New Cross Area Framework, Catford Town Centre Master Plan); IDP (Infrastructure Development Plan) • Good attempts to consult (e.g. 2015 Review, Characterisation Study 2019; calls for sites 2015, 2016, 2018; 2021 draft, online workshops), though time for consultation on this draft is too short given its length and the constraints of the pandemic • Useful consolidating lots of separate development documents into one • Good general aspirations, difficult to disagree with; but lack of real vision, for Borough and neighbourhoods, with clear milestones to ultimate Vision in 2040 Interesting and useful background analysis and new policy ideas (e.g. on height)	Noted.	No change.
Blackheath Society no 2	-	General	• Much too long, and often repetitive, especially in Policies and Explanations • Short (31-page), accessible summary useful but bland. Need practical summary of just a short vision and good 'strap line', then detailed policies and annexes • Some individual Development Management Policies (Part Two) rather long • Too much focus on uncontrollable aspirations and not enough on practical, achievable deliverables (as required by NPPF) • No recognition or explanation of how irreconcilable aspirations and policies are to be resolved, weighted or prioritised when they clash Why such long timescale (2020-40) and what about milestones (5 yearly) and reviews, evaluations and updates to adapt flexibly to a changing world?	Noted. The level of detail included in the plan is in part a response to feedback from local community groups who requested that the new Local Plan provide more detailed policies and guidance on selected policy topic and neighbourhood areas. However it is acknowledged parts of the plan are repetitive and could be made more concise. The Summary Document was prepared to support the Local Plan consultation and provides a broad overview of the main issues and policy proposals. The NPPF requires to Local Plan to cover a minimum 15 year period from adoption. The Council is required to review the Local Plan every 5 years.	The Local Plan has been reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan has also been prepared.
Brockley Society	-	General	• Brockley Society participated in the consultation process that helped to inform the Lewisham Characterisation Study of 2019. We offer comments now on the more expansive Draft Local Plan. This is a composite document prepared by our planning group. Part 1 is deliberately limited to key concerns affecting the operational area of Brockley Society and is therefore confined geographically to the district neighbourhood of Brockley and its hinterland as set out in Lewisham West Area (LWA of Part 3 of the Draft Local Plan). Other comments follow in Part 2	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Brockley Society	-	General	1.The Council must assess and explain the impact of Covid-19 on the proposals The draft makes only a very brief reference to the impact of Covid-19 on the proposals, noting its impact on the local economy and need to take into account its effects in future plans. This is not	Noted. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline

			adequate. The proposals in the draft rest on important assumptions that must be reassessed in view of the pandemic, such as projections about overall housing need, the kind of homes required, the demand for commercial and retail premises and the priority to be attached to providing public recreation spaces. It would be unreasonable to adopt the plan without either reviewing these central assumptions in light of Covid-19 or least explicitly committing to review the proposals within two years. Alternatively, if the Council has already taken into account the impact of Covid-19 in preparing the draft, it must explain how it has done so and how this has affected the proposals. As things stand the draft reads as though the last 12 months have not happened, which makes it impossible for respondents to engage meaningfully with the proposals and determine whether they are appropriate or not. • For example, the draft asserts that "*[m]any more new homes must be built to meet the needs of a growing population*", and follows the draft London plan in claiming a need for 16,670 net new homes over the next ten years. But it does not explain whether this projection takes into account the expected long-term increase in working from home and any resultant impact on the number and type of homes that will be needed in Lewisham.	following the Regulation 18 consultation taking account the latest information on the impact of Covid-19 and related issues The National Planning Policy Framework requires that development viability is considered through the plan process. A Viability Assessment has therefore been prepared as an evidence base document.	information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections.
Brockley Society	-	General	**Enforcement:** The weakness of Enforcement in the borough is an ongoing problem. The best policies will be irrelevant if people can just get away with breaking the rules. The Local Plan needs to include this as a key objective, including how it can be funded. Otherwise it will always be ineffective because of lack finance	Planning enforcement is outside the scope of the Local Plan. Part 4 of the Local Plan sets out the arrangements for delivery and monitoring of the Local Plan, including funding mechanisms such as Community Infrastructure Levy and planning obligations.	No change.
Climate Action Lewisham	-	General	Climate Action Lewisham is a local community group working to support and generate initiatives to reduce our collective greenhouse gas emissions and create thriving sustainable neighbourhoods in the face of the ecological crisis. We supported Lewisham borough to declare a Climate Emergency in 2019 and we have maintained a relationship with the council since then. We aim to communicate with the borough's communities about the ecological crisis and run projects which support local people to make greener choices and contribute to their sustainable communities across Lewisham. We would love to see Lewisham become a leader in reducing carbon emissions and supporting social justice and sustainable outcomes in collaboration with its people in decades to come.	Noted and support welcomed. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Culverley Green Residents Association	-	General	**General** Although there is much to commend in the draft plan in terms of the background research and information that has gone into its preparation we are concerned that the issues identified are not necessarily being carried forward properly into policies and actions and specific projects. Too much of the plan is predicated upon accommodating residential unit building to the detriment of employment, open space, traffic, transport, climate change impacts and supporting community facilities. We are totally aware that the Plan has to be in conformity with the London Plan and with the housing need methodology imposed by central government but the continued assumptions around 'london has to grow at all costs' as it is the economic driver of the country is at odds with the present government supposed initiatives to send more government departments out to the regions and to focus on the 'left behind' areas of the country. The plan remains based upon a predict and provide model which would appear to have shaky foundations. Although the Covid pandemic is mentioned, there is no mention of Brexit and the impacts of both these things on population growth or possible decline, patterns of work and how these might change,	Noted. The local plan seeks balance growth by ensuring that future development are aligned with the principles of sustainable development. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues. The Council is required to review its adopted Local Plan every 5 years	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections

			the accelerated change to on line shopping etc. and what these changes might mean in terms of our high streets, traffic, transport , the demand for larger housing units to accommodate home working, the possible demand for more hubs for click and collect (or even encouraging these as a way of reducing the number of delivery vehicles on our streets), the increased pressure and impacts on our open spaces that the pandemic has caused. I could go on.	and consider the scope for changes informed by monitoring and new evidence. The review process will allow for consideration of the longer term impacts of Covid-19 and Brexit.	
Culverley Green Residents Association	-	General	**There are no tangible benefits to existing residents** The website contains several well-structured research documents on local attitudes and desires. However, these do not appear to be reflected in the draft Local Plan, which is little more than a Building Plan. I had expected something more visionary, something that would be a roadmap to making Lewisham/Catford a more attractive place to live, not only for new young people but for existing residents. At the moment all that seems to be promised is an intention to make life for car drivers more difficult. Without some clearly stated benefits, I fear there will be little buy-in from residents to the Plan and, on the evidence of the proposal for a 19-storey tower in Catford Green, a strong likelihood of public resistance. CGRA would ask how much consideration to the local wishes is going to be taken on board	Noted. The Local plan is legally required to set a framework for the development and use of land. The Local Plan seeks to balance growth by ensuring that future development is aligned with the principles of sustainable development in national planning policy and Good Growth policies in the London Plan. Part 3 of the Local Plan (Lewisham's Central Area) sets out key objectives for managing development and delivering improvements in the Catford Area, for the benefit of existing and new residents, workers and visitors. The Council has also prepared the Catford Town Centre Framework, through extensive public consultation, to support implementation of the Local Plan.	No change.
Culverley Green Residents Association	-	General	**There's no awareness of demographic changes** This plan is covering a 40 year period. It is therefore very surprising that it is so fixed and rigid, assuming that the needs and requirements of 2035 will be the same as those in 2021. The housing target, which seems to be the driver of the Plan, was set before Brexit was implemented and before the pandemic. Of course, we can't predict the effect of these two phenomena but to make no reference to them at all, and to even suggest some flexibility, seems a serious omission. London's population is in decline at the moment. This trend may not be reversed in which case the demand for new homes may be reduced.	Noted. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues. The London Plan sets a housing target for Lewisham which the Local Plan must seek to meet. The Council is required to review the adopted Local Plan every 5 years and consider the need for changes taking into account monitoring and new evidence.	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections
Culverley Green Residents Association	-	General	**The programme is incomplete**	Noted. The Council has and will continue to engage with landowners to understand the	Local Plan amended to include information on indicative timeframes for delivery of the site allocations.

			The Plan has boxes identifying when each site will be developed but they're not filled in. It looks very much as if Catford will be a building site for 40 years: this is not an attractive proposition for residents or businesses. A timetable, however tentative, would be, if not reassuring, at least honest.	likely timeframes for the delivery of site allocations.	
Culverley Green Residents Association	-	General	**The plan is ageist** The walking plan, the emphasis on cycling and the anti-car attitude are all clear signals that the Catford of the future is not a place for older people. Where do you suggest the elderly population of Catford go? The only seating area is right next to the A205 and there is not a single mature person in any of the illustrations and no provision for toilets	Disagree. The Local Plan seeks to ensure that new development contributes to the delivery of neighbourhoods that meet the needs of people of all backgrounds, ages or abilities. This is reflected in the strategic objectives, and carried forward in the policies, for example, in Policy QD2 inclusive and safe design. The Local Plan provides a framework to enable modal shift and improve air quality, in the context of the London Mayor's objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The plan seeks to facilitate the delivery of new infrastructure to improve public transport options in areas that are currently poorly served. The Local Plan policy on public realm QD3 seeks to ensure appropriate provision for public conveniences, including toilets.	No change.
Culverley Green Residents Association	-	General	**There are no actual aspirations beyond unit targets** The plan gives a number of units and area for retail for each site, but this does not portray the ambition. It should state how many units of each size, amount of green space (or distance to), the number and type of retail units the Council will hope to attract. Ultimately, these things will be determined by a developer but the Council needs to set its expectations. (It might be helpful too if the Council was more realistic about parking and car-ownership	Disagree. Whilst recognising that the Local Plan must deliver on the London Plan housing target for Lewisham, it sets out a vision and strategic objectives, along with policies across a wide range of thematic policy topics to help realise these. Part 4 of the Local Plan includes a monitoring framework with metrics against which the delivery of the plan can be assessed. The Local Plan is supported by an up-to-date evidence on open space and green infrastructure. This sets out requirements for the provision of new open space across the borough to address identified deficiencies.	No change.

Deptford Society	-	General	The Deptford Society particularly supports those aspects of the draft local plan which place an emphasis on high quality design and placemaking. There are however two fundamental aspects of the document which give us particular cause for concern: 1. In far too many places the plan aims only to maintain the status quo (e.g. air quality, provision of public open space, prevent harm to heritage assets) rather than aspiring to improvement. We would like to see a more imaginative and attractive vision for the borough rather than an acceptance that things are as good as they can be. 2. No matter how much emphasis is placed on achieving high quality design in the planning process, there will always be a need for an effective and timely enforcement process. We are disappointed that the local plan makes no mention of the council's role and powers in planning enforcement, or any intention to prioritise resources in order to quickly address any planning breaches that threaten to further erode the status of conservation areas or heritage assets. The Deptford Society's long-term experience of being the amenity group for a conservation area on the risk register is that the cumulative effect of unchallenged breaches, insufficient monitoring and enforcement resourcing and planning decisions that contradict the advice of the CA management plan are all contributing to the continued deterioration of this irreplaceable asset. The local plan is an opportunity for the council to reverse this decline and enable the CA to be removed from the risk register.	Support noted. Disagree that the plan supports the status quo. The Local Plan sets out a strategy to facilitate the delivery of Good Growth in line with the London Plan. It introduces new policies and approaches to address identified local issues and opportunities. This includes for example, more stringent requirements for development to be a minimum air quality neutral, reduce carbon emissions and be net carbon neutral, for it to deliver new and enhanced open spaces particularly in areas of identified deficiency, and provide for public realm improvements to support the London Mayor's target for 90% of journeys in inner-London to be made by walking, cycling and public transport. Part 3 of the Local Plan sets out a vision and strategy for each of the borough's 'character areas', which provide a basis for sensitively managed change and improvement over the plan period. Planning enforcement and Planning Service resourcing are outside the scope of the Local Plan.	No change.
DNA	-	General	DNA have made good progress in the production of our Regulation 16 version of the Deptford Neighbourhood Plan, based on representations from statutory consultees, major developers and extensive public consultation. The next and final draft is also adapting to the new London Plan, the Climate and Biodiversity Emergency and Post-Pandemic Recovery and will have regard to the emerging Local Plan for Lewisham. We welcome the opportunity to comment on your Regulation 18 Plan version. We wish to work with Lewisham Council and partners more closely to shape the Local Plan policies and the Infrastructure Delivery Plan matters relevant to Deptford. The neighbourhood plan will be submitted for examination before the new Lewisham Plan is adopted. However, we hope through close collaboration and recognition of our years of work with the communities of Deptford, a more 'Deptford specific' new Local Plan can be informed by our work on the neighbourhood plan. This is not possible for us to do this in all the detail needed at this juncture and in this letter. We have however requested a meeting with [name removed] and [name removed] of the Council's Planning Policy team to discuss our key points in more detail.	Lewisham's Mayor and Cabinet recently refused the re-designation of the DNA Forum. The decision was made following public consultation where the Council received a significant proportion of responses objecting to DNAs re-designation. The Council has and will continue to consult with local communities and community groups, including in the Deptford area, to inform the preparation and support the implementation of the Local Plan.	No change.
Downham Dividend Society	-	General	1. Downham is an area with a history of neglect and under development this is unlikely to change unless specific efforts are made to engage the people in Downham. I am unaware of any 'anchor'	The Regulation 18 consultation was carried out in accordance with the	No change.

			organisations' attempt to engage Downham residents in discussing the implications of the Downham plan. 2. Given the history of Downham and the Marmot Covid Review unless specific efforts are made perhaps with a specific co-ordinator role (Downham tsar') then the current proposals are likely to worsen social exclusion in Downham. 3. I am unaware of any engagement event in Downham around the local plan and we've not had a local area meeting even on Zoom for approaching 2 years. 4. A Downham plan is likely to set out the principles of how the community wishes our neighbourhoods to be regenerated. A draft plan should include the following:	Council's adopted Statement of Community Involvement. To support the consultation, the Council carried out a series of online information sessions where the public were provided with opportunities to interact directly with Council planning officers. The Local Plan acknowledges and seeks to address deprivation that is prevalent in the Downham area, and Part 3 (Lewisham's South Area) includes specific policies around this, for example by designating a Strategic Area for Regeneration.	
Environment Agency	-	General	Document attached to Environment Agency representations: Lewisham TE2100 Council Briefing October 2020	Noted. The Local Plan sets the planning framework to support the delivery of the TE2100 action plan, which is referenced in the Part 2 policies on Sustainable Design and Infrastructure.	No change.
Environment Agency	-	General	Thank you for consulting the Environment Agency on the draft London Borough of Lewisham Local Plan. We welcome the draft local plan which will ensure new development is designed and constructed to high environmental standards, with a focus on delivering green and blue infrastructure and protecting and improving the environment. We welcome the policies on flood risk management, urban greening, waste management, water efficiency, pollution prevention and adapting to climate change. Refer to Section 1 for detailed feedback on the draft local plan policies and suggested updates to strengthen the policies further. Section 2 includes feedback on the proposed site allocations and character areas. Section 3 has feedback on the Sustainability Scoping report and suggestions on new strategies and plans to include.	Support noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Environment Agency	-	General	The map attached shows the key environmental issues and opportunities across Lewisham. This shows a unique environment with a high number of river corridors from the tidal Thames to the Ravensbourne, Quaggy and Pool. There's also a high number of groundwater source protection zones, brownfield sites and clusters of waste management sites and a number of high risk flood zones. There's major opportunities to deliver ongoing environmental improvements and deliver river restoration schemes and high quality developments with high standards of sustainable design and construction. It's essential the environmental evidence base and environmental capacity is regularly assessed to ensure the right environmental infrastructure is in place to support delivery of the current London Plan housing target for Lewisham for 1667 new homes each year.	Noted. The Local Plan Part 2 policies on Sustainable Design and Infrastructure set out policies concerning flood risk and water management. The plan seeks that development proposals maximise opportunities to improve Lewisham's waterways. Site specific requirements are included in Part 3 of the plan. The adopted River Corridors Improvement SPD will support the implementation of these policies, and may in the future be updated. The Local Plan policies have been informed by an evidence base which the Council considers is up-	No change.

				to-date, including a Strategic Flood Risk Assessment.	
Environment Agency	-	General	**Environmental evidence and data** All planning policies, proposed site allocations and planning decisions need to be informed by the latest environmental data and evidence and state of the local environment to ensure new development delivers environmental improvement. ▪ For the latest data sets such as groundwater source protection zones, flood risk zones, main river maps http://environment.data.gov.uk/ds/partners/index.jsp#/partners/login ▪ Catchment planning data https://environment.data.gov.uk/catchment-planning/ We hope our response is helpful, and if you have any questions or require more information please let me know. We look forward to continuing to work in partnership with you to deliver environmental protection and enhancement across the London Borough of Lewisham.	Noted. The Local Plan policies have been informed by an evidence base which the Council considers is up-to-date, including a Strategic Flood Risk Assessment based on the latest EA data for water management. The Local Plan requires applicants to consult the EA where appropriate to ensure the latest environmental information is used to inform development proposals.	No change.
Forest Hill Society	-	General	**Introduction** "*We have a once in a 100 years' opportunity to shape the centre of Forest Hill, reflecting the needs and aspirations of people who live and work in the area.*" The Forest Hill Society's (the Society) response to the Lewisham Local Plan (LLP) stems largely from the Forest Hill Station and Town Centre Master Plan (Master Plan) created in 2016 in partnership with the Society and Forest Hill-based Discourse Architecture. This Plan focussed on the urban renewal of the town centre particularly around Forest Hill Station and embodied many of the LLP's Strategic Objectives, particularly around economic growth and housing and are reflected in this submission. The Master Plan along with this submission addresses a number of themes in the LLP. A bigger vision will prevent the continuation of ad-hoc development and allow the disparate sites on both sides of the rail tracks to be knitted together into a coherent arrangement. Our approach to "Inclusive Neighbourhoods" focuses on accessibility issues at the station and critically other local amenities including Forest Hill Pools. We address the provision of "Housing" included above and beyond projections for the sites covered in the LLP. We also cover the 'Thriving Economy' focussing on investment in Forest Hill town centre to enable the creation of a new cultural quarter and area of significance for the night-time economy. This ultimately benefits the entire Borough. We also support measures to improve greening, walking and cycling, safer pedestrian crossings and Healthy Streets initiatives as well as supporting plans for consultations into LTNs in the area. While broadly supportive of the draft LLP, we would like to see some changes in priorities on some specific issues and these are described in the submission. We also feel some elements should be more precisely articulated all to bring a clear vision for the Forest Hill area over the next twenty years. The Master Plan fully reflects this and we would propose its key elements are fully incorporated into the LLP. A copy of the Master Plan is included with this submission. **The Forest Hill Society** The Forest Hill Society is a civic amenity society, formally constituted and established in May 2006 and currently has around 400 members. It set objectives to stimulate public interest and to promote civic pride in and around Forest Hill; to promote high standards of planning, architecture, sustainability and services; to secure the conservation and enhancement of amenities and features of public interest and has a policy of inclusion and equality of opportunity within the Society.	Noted. The Council acknowledges the work undertaken by the local community on the preparation of a master plan for Forest Hill. Officers have reviewed the masterplan and considered it during the preparation of the Local Plan. It is noted that the Local Plan aligns with the objectives set out in the masterplan. The Local Plan is a strategic document, and there are some locally specific initiatives or projects that may not therefore be addressed by it.	No change.
Forest Hill Society	-	General	**The Structure of the Response**	Noted. The Council has and will continue to liaise with landowners	Local Plan site allocations updated with indicative timeframes for delivery.

			Our response will focus on the Forest Hill Station and Town Centre 'Master Plan' and how it practically aligns well with many of the strategic goals and objectives stated in the LLP – we believe it can realistically deliver a significant medium-term win for both Forest Hill and the wider Lewisham community. If substantially included and articulated in the LLP then it will also ensure that potential site developers see that from a planning perspective the scheme forms part of a wider Council strategy. The original plan from 2016 and data are included in full in Appendix A and B1/B2. Aside from the Master Plan we have largely refrained from commenting on other aspects of the Plan where we are in broad agreement to avoid re-iterating points already well made. We have, however, included some key points that we feel are worth strengthening or need inclusion (e.g. airspace redesign issues) At this time the Society has not commented on the LPA's "Timeframe for Delivery" forecasts. We recognise that any redevelopment proposal for the Station, its buildings and the surrounding area will require detailed negotiation and approvals to be obtained from a variety of bodies. For instance, Network Rail and the Office of Road and Rail among other bodies are statutorily bound to develop investment plans in five-year Control Periods (CP). The current CP6 covering 2020-24 has no investment proposals for Forest Hill. The Society recognises a realistic approach would see development planned for and commencing in CP 7 which starts in 2025 and runs to 2029.	to understand the likely timescales for delivery on site allocations included in the Local Plan.	
Forest Hill Society	-	General	**Aircraft Noise Pollution and Redesign of Flight Paths over Lewisham** The Council is invited to enhance the Draft LLP by adding a new initiative that adopts a fresh approach, now replicated in other London Boroughs. This adds new processes and proposals to address a problem issue that does not always gain significant prominence except for those directly under the flight-paths – the often overbearingly intrusive noise generated by aircraft in poorly designed flight paths over the Borough of Lewisham. This new element to the Draft LLP will result in improvement of the Council's ability to comply with The Environmental Noise (England) Regulations 2006 (as amended). This requires Noise Action Plans for much of Greater London to include provisions that aim to protect any formally identified 'Quiet Areas' from an increase in road, railway, aircraft and industrial noise. We specifically request that the Borough include policies in the LLP that engage directly with flight path planning proposals and periodic airport and airspace planning consultations. In addition, to support and inform its planning and participation on noise and flight path issues we propose that the Borough joins and exchanges information with the Heathrow Community Noise Forum (HCNF), London City Airport Consultative Committee (LCACC), No Third Runway Coalition and the Aviation Environment Federation. By doing so, Lewisham can positively monitor and engage in how Air Space is designed and used over the borough. A major portion of the Air Space over the borough has a double overflight issue whereby inbound aircraft to London Heathrow Airport (LHR) and London City Airport (LCY) overfly one another's flight paths at heights between 2,000 and 5,000 feet. Consequent aircraft noise intrusion is doubly excessive and impacts directly and negatively on residents, health and well-being and additionally furthermore diminishes residents' enjoyment of open spaces. The Independent Commission on Civil Aviation Noise (ICCAN) recognise that there is increasingly robust evidence on the effects of aviation noise on health and quality of life, as well as on cognition and learning in children. Please see Appendix D – Principal Roles and Functions: Lewisham and ICCAN.	Noted. London Plan policy T8 (Aviation) sets out policies addressing this matter. It is not considered necessary to duplicate these strategic policies in the Local Plan. The London Plan sets additional policies for minimising and managing noise across the Borough. For example Policies D13 and D14 provide policies aimed at improve health and quality of life, residential and other non-aviation development proposals.	No change.

			They also assert there is a need for aircraft noise pollution to be considered a priority in planning policy and regulation so that these challenges can be better addressed. Furthermore, communities living under flight paths may experience excessive and prolonged exposure to aircraft noise, so there is a need to use measures that effectively mitigate noise pollution for affected communities. The Society feels it is important that the Council maintains capability, heightens its awareness and readiness to monitor, understand and respond to Air Space Design matters. This should be done with a holistic view about how the Air Space is being used by London airports and of the environment and noise issues that arise from that use. In particular, how those factors can be managed and their impact mitigated must be included in and map into objectives defined in the Draft LLP. Horniman Museum and Gardens, Forest Hill, London SE23 3PQ is one prime example of high-quality open space that is seriously affected by low flying aircraft and consequent noise pollution. It lies under the 400m wide corridor for inbound aircraft to LCY. Aircraft fly over the hill at some 1,600 to 2,000 feet and at that height, aircraft noise interrupts and halts all conversion between visitors. Amongst many other key sites and open spaces, many local schools across the borough are also under this same flight path and endure the same levels of noise pollution. The Society has worked for the last two years in developing an evidence-based campaign to challenge how our neighbouring airports design and operate their flightpaths within our airspace. In doing so it has presented to elected members of our Council, co-ordinated with the help of Cllr Leo Gibbons and has consulted closely with local MP Ellie Reeves, Cllr Sophie McGeevor, Cabinet Member for Environment and Transport, and GLA member Len Duvall. All have been very participative and proactively support efforts on matters such as aircraft noise pollution, air-space redesign, environmental pollution and continue to engage alongside the Society's efforts. MPs Vicky Foxcroft and Janet Daby have also expressed support. The real issue here is that with genuine commitment some resolution can be achieved by better design being applied to the use of Air Space and flight paths through it with particular focus being brought to improved flight dispersals and significant respite from overly intrusive, repetitive aircraft noise being inflicted on residents.		
Forest Hill Society	-	General	**Appendix D – Aircraft Noise: Principal Roles and Functions: Lewisham and ICCAN** The Independent Commission on Civil Aviation Noise (ICCAN) is a body created to act as an independent, impartial voice on civil aviation noise and how it affects communities. This Appendix, *inter alia,* contains extracts from ICCAN Report On The Future Of Aviation Noise Management published in March 2021 and includes recommendations that Lewisham Council is requested to adopt. **Proposed Recommendations for Lewisham** The Society requests that the borough consider including and adopting the following actions at Elected Member and Officer levels within the proposed policy. **1. Heathrow Community Noise Forum (HCNF)** At officer level, join the forum. This will give the Council direct information from Heathrow on forthcoming activities that will impact on residents. For example, a flight path planning workshop looks in detail at proposals from Heathrow under the CAA's CAP1616 planning process and allows examination of how proposals will affect residents. Whether or not	Noted. London Plan policy T8 (Aviation) sets out policies addressing this matter. It is not considered necessary to duplicate these strategic policies in the Local Plan. The London Plan sets additional policies for minimising and managing noise across the Borough. For example Policies D13 and D14 provide policies aimed at improve health and quality of life, residential and other non-aviation development proposals.	No change.

			Lewisham sends a representative to the bimonthly meetings (many Councils are represented), joining will ensure papers will be provided direct to the Council and that the Borough is able to take close interest in matters that affect us. We can provide contacts. **2. London City Airport Consultative Committee (LCACC)** At Councillor level, join this committee in order to receive development papers, represent overflown residents and ensure the opportunity to contribute to flight path planning is taken. The Airport has been historically dismissive of Lewisham residents' interests for many years but is being forced to wake up to the environmental problems its flight path concentration has caused over SE London. Cllr Sophie McGeevor, Cabinet Member for Environment and Transport, has attended the committee several times. We would suggest that we build quarterly attendance into workplans and at Officer level, we should ensure that LCACC papers are also distributed directly to planning and environment teams. We can provide contacts. **3. No Third Runway Coalition** We propose that the Borough should join this group, as many other Boroughs have. Again, an excellent source of information and collaboration. When Heathrow next bring out a consultation, the work of officers can be shortened by collaboration with SE London Boroughs with very similar issues - Southwark, Lambeth, Greenwich and Eltham all have very similar issues with aircraft noise and flight paths as Lewisham. **4. Aviation Environment Federation** Another organisation where the Borough can subscribe and officers can routinely receive relevant information to inform the Borough's position on aviation noise and emissions.		
Greater London Authority	-	General	Thank you for consulting the Mayor of London on Lewisham Local Plan Regulation 18 'Main Issues and Preferred Approaches' consultation. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse and which are attached as Annex 1. As currently drafted, there are a number of concerns, which, if left unattended, could constitute potential issues of non-conformity with the London Plan. This includes, in particular, the borough's proposed approaches to employment floorspace and waste management. The Mayor is happy to continue working with Lewisham to provide support on how the approach in the Local Plan might be improved and further evidenced, in order to support the strategic spatial approach of the London Plan to help deliver Good Growth in the borough.	Noted. The Council will continue to engage with the Mayor of London / GLA on the emerging Local Plan to ensure it is in general conformity with the London Plan. A number of changes have been made to the Regulation 18 stage document, taking into account this representation. Further details are set out elsewhere in this Consultation Statement.	No change.
Greater London Authority	-	General	The London Plan 2021 was formally published on the 2 March 2021. It now forms part of Lewisham's Development Plan containing the most up-to-date London-wide policy framework. The references in Lewisham's draft Local Plan have to be updated to accurately reflect the policies of this London Plan and its associated London Planning Guidance.	Noted.	Local Plan amended to ensure appropriate references to the London Plan (2021) and associated guidance.
Greater London Authority	-	General	**Next steps** The Mayor, through the GLA, looks forward to continuing to work with Lewisham to resolve the strategic issues identified in this letter and to provide further guidance to ensure the Local Plan aligns with the London Plan as well as delivering Lewisham's objectives.	Noted.	No change.
Grove Park Neighbourhood Forum	-	General	The Grove Park Neighbourhood Forum believe that the policies on Grove Park should better align to the Grove Park Neighbourhood Plan, particularly in emphasising the delivery of the district park, and how the renewal of Grove Park town centre should come about.	Noted. The Local Plan has been prepared having regard to the Grove Park Neighbourhood Plan, and through consultation with the Grove Park Neighbourhood Forum.	No change.

				Officers consider that the Local Plan aligns with and supports the vision, objectives and policies in the Neighbourhood Plan.	
Historic England	-	General	London Borough of Lewisham – Regulation 18 Consultation on draft Local Plan Thank you for the opportunity to comment on the above consultation document and for the agreement of an extension to the deadline for responses. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process. Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). They focus in particular on whether the draft Plan makes sufficient provision for the conservation and enhancement of the historic environment in Lewisham through strategic policies (NPPF, para 20), whether the identified evidence base for the historic environment is relevant and up to date (para 31) and if it therefore sets out a positive strategy for its conservation and enjoyment (para 185). We note the scale of growth that the Borough has to address over the coming years, and in broad terms we consider that the draft Plan sets out a potentially successful framework for managing the impacts of this growth on the local historic environment. We note and welcome the focus throughout the Plan on the importance of future growth being character led, as well as the detail on heritage across a broad range of relevant policy areas.	Noted. The Lewisham Local Plan recognises the important role of the historic environment in Lewisham and supports the conservation and enhancement of historic assets across the Borough. In addition, policies contained in the Local Plan are aligned with the NPPF paragraphs 20(b) and 185 and London Plan (HC1-HC5).	No change.
Historic England	-	General	I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.	Noted.	No change.
Hither Green West Campaign Group	-	General	LEWISHAM LOCAL PLAN – HITHER GREEN WEST'S SUBMISSION 'Hither Green West' campaign group is a resident-led campaign representing the interests of residents on the west side of the railway lines in Hither Green and Catford North, whose ambition is for Hither Green West to be the best place it can be. We welcome the opportunity to share our thoughts on the Lewisham Local Plan. This submission expands upon the shorter submission we made on the Commonplace website, which, unfortunately, we found too confusing and restrictive a tool to submit a detailed response. However, we note the submission we made on Commonplace received 146 'likes' in only two days and more than for any other comment submitted to the Lewisham Local Plan consultation.	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Hither Green West Campaign Group	-	General	We are happy to meet with you and Council officials to develop proposals for Hither Green West and be glad to assist with community engagement.	Noted. Offer of support for community engagement is appreciated and will be considered for future consultations.	No change.
Home Builders Federation	-	General	**We would like to submit the following comments on the draft Plan and we would like to be involved in subsequent consultations of the new Local Plan.** **Local Plan period** It would be very helpful if the Council could state the plan period on the front cover. We understand from page 18 of the draft Local Plan that this is 2020-2040.	Noted. The HBF has been added to the consultation database and will be notified of future local plan consultations. The plan period is set out in Part 1 of the Local Pan. The adoption date will be included on the front cover, consistent with	No change.

				the approach used by the London Plan.	
Home Builders Federation	-	General	**Lewisham Local Plan: Regulation 18: Late representation from the Home Builders Federation** I hope you will consider this late representation from the Home Builders Federation on the draft Lewisham Local Plan Regulation 18 consultation version. James Stevens, the HBF's Director for Cities, has prepared this response and he is the lead contact for all things in relation to the Lewisham Local Plan. The Home Builders Federation (HBF) is the principal representative body of the house building industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational plc's, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year. Recent research by the Government has estimated that housebuilders have made a significant contribution to the nation's infrastructure, providing some £21 billion towards infrastructure of all types including affordable housing since 2005.	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Home Builders Federation	-	General	I hope these comments will help the Council to prepare the next iteration of the Local Plan. The HBF would be happy to speak to the Council to discuss the content of these representations further.	Noted. All comments received on the public consultation have been considered in the preparation of the Regulation 19 document.	No change.
HopCroft Neighbourhood Forum	-	General	**General Comments:** Positive: • In the introductory sections there is a recognition of the importance of green space including railway corridors and there seems to be a genuine commitment to resist development on green spaces and to safeguard trees. • There's a commitment to retaining the village/forest landscape across Brockley/Crofton Park/Forest Hill • The council say they are committed to enhancing protections of green spaces and recognising heritage sites. • Residential development areas are clearly identified and there are requirements for developers to include green and social spaces.	Noted.	No change.
HopCroft Neighbourhood Forum	-	General	Beyond the introduction pages there are no actual plans around these protections and enhancements. Maps are unclear as designations aren't included and it is difficult to see how policies apply to different areas.	Noted. The maps included in the Local Plan were informed by the Council's evidence base, including the Open Space Assessment and SINC Review. A Policies Map will be prepared for the Regulation 19 stage consultation – the changes are currently reflected in the Changes to the Adopted Policies Map paper.	A Policies Map has been prepared to set out land-use designations and map their spatial extent.
HopCroft Neighbourhood Forum	-	General	There's still some ambiguity with respect to development decisions - what does 'exceptional circumstances' mean? Is there a criteria?	Noted. That nature of exceptional circumstances may vary on a case by case basis. However, the Local Plan will be amended to provide further clarity around criteria for considering exceptional circumstances, where possible.	Local Plan amended to provide additional clarification around criteria for exceptional circumstances, where possible.
Ladywell Society	-	General	The overriding concern is that we need to avoid a substantial increase in population density and certainly put a stop to any more high-rise development. We already have traffic jams on our roads, high pollution levels and pressure on our services and remaining open spaces. There is also a	The London Plan sets a housing target for Lewisham, which the Local Plan must seek to deliver.	No change

			psychological effect of overcrowding… It has been felt for a long time that just building more accommodation regardless of the standard, height or overcrowding is a knee jerk reaction. It's even an "easy" answer where we should be capable of more creative thinking. First, as was promised by the Mayor of London at his election, we should ensure that all building projects are aimed at people who live, work or who have family in the area. It should be illegal to build and market any development outside the area as this is both an upward pressure on prices and reduces availability for those who really need it. Ensuring a small percentage of any development for "affordable" accommodation is woefully inadequate! Councils should be the only developers allowed to commission new build and they should do it with the above objectives in mind. New properties should have gardens and be no higher than adjacent homes. Key to this should be a campaign to encourage multigenerational living. It should be considered socially acceptable, even a positive thing to do for the community. Councils should provide grants to make alterations to existing properties to provide self-contained accommodation for either teenagers, young couples and/or grandparents. They could keep lists of approved contractors and guarantee the work. This approach would encourage family support for child care and caring for elderly relatives, thus reducing demand on community facilities. This is radical by current viewpoints and it is only by such thinking that we can really make our towns and cities more healthy, relaxed and great places to live.	The London Plan acknowledges that tall buildings will make a contribution to meeting the Capital's housing need. It directs Boroughs to identify locations suitable for tall buildings and set parameters around height and design, which is reflected in the Local Plan. The Local Plan recognises the acute need for genuinely affordable housing in Lewisham, and sets out policies to address this including a strategic target of 50% of all new homes to be genuinely affordable. The Local Plan adopts the London Plan housing standards, including for outdoor amenity space and children's play space. It is unrealistic to expect that the Council will be the only developer. The Local Plan sets the framework to manage growth and development from a wide range of stakeholders, including from the public and private sector.	
Ladywell Society	-	General	With particular regard to Ladywell in both the Village and the whole ward it is important to retain the local character and heritage (not just within the Ladywell Conservation Area), including the Ladywell Baths, mortuary and coroner's court, within the St. Mary's Conservation Area. A criteria for assessing planning applications should be to identify its contribution to the local heritage so that applicants know in advance that this will be an important consideration.	Noted. The Local Plan makes clear that planning applications likely to affect a heritage asset (including conservation areas) must include a Heritage Statement.	No change.
Lee Forum	-	General	The Lee Forum committee has prepared this response to Lewisham's Local Plan. The plan covers the period 2020 – 2040. Its comments consider the plan overall and specifically how it reflects community wishes for the Lee Forum area as expressed in the Lee Neighbourhood Plan, that is now close to its final stages of adoption. We thank you for this opportunity to comment.	Noted. Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change
Lee Forum	-	General	Lee Green specific 1. Leegate is a test case for the draft plan and has highlighted places where both the draft Local Plan and the draft neighbourhood plan need revisions.	Noted. The Local Plan sets out policies for managing development in Lee Green, including the Leegate Shopping Centre. The Local Plan is separate from any individual planning application that is being considered through the planning approval process.	No change.
Lee Forum	-	General	The plan covers twenty years and projections in this time frame are notoriously inaccurate. Funding and technological availability could also shift dramatically in this time frame. It is important that items that cannot be currently funded are not omitted as funding could possibly become available within this time frame.	Noted. The Council is Local Plan is required to review its adopted Local Plan every 5 years and consider the need for any updates	No change.

				or changes, informed by monitoring. The Infrastructure Delivery Plan is a 'living document' that is subject to regular updating and review.	
Lee Forum	-	General	The main driver throughout is the need to meet new homes targets, which will lead to higher housing density. At the same time some the councils aims to increase green space and good design. It is not clear how these aspirations can be delivered alongside each other. We would like to see road maps and plans as well as aspirations.	Noted. The Local Plan sets a strategy for managing growth in line with sustainable development principles set out in national planning policy and Good Growth policies of the London Plan. Details around the approaches to open space provision are set out in the Part 2 policies on Green Infrastructure.	No change.
Lee Forum	-	General	There are no measurable targets linked to the many aspirations. A road map with specific actions showing how ambitions will be delivered and measured is needed.	Noted. Part 4 of the Local Plan sets out the framework for monitoring delivery. In addition, the Council's Infrastructure Delivery Plan is published alongside the local plan. The will set out all the infrastructure requirements and how it will be delivered, and is subject to regular review.	No change.
Lee Forum	-	General	The Council should commit to transparency in planning decisions with the publication of officer led decisions on its website in a timely manner.	Noted. Information on the Council's planning decisions in made publicly available on the Council's website.	No change.
Lee Forum	-	General	Where do Neighbourhood forums figure in community engagement? Neighbourhood forums, which are statutory consultees, are not identified as a key stakeholders for the pre planning stage, yet they are vital in communicating the community's views before any public consultation stage.	Neighbourhood forums have been, and will continue to be, consulted during the preparation of the Local Plan, in line with the Council's adopted Statement of Community Involvement. The Local Plan strongly encourages developers to consult with local communities and community groups, including forums who are statutory consultees, at the early planning and design stage.	No change.
Lee Manor Society	-	General	**Scale and format** At 872 pages the Plan is of excessive length with many unnecessary duplications of information. Tighter editing could have avoided these duplications and considerably reduced its length. Examining a report of such length places a considerable burden on non-professional community groups. My copies of the 2001 Unitary Development Plan and the 2010 Core Strategy both run to about 200 pages. (The government's recent review of Britain's foreign, security, defence and aid policy ran to only 114 pages). At future stages of consultation, a hard copy of the plan should be made available to interested parties for a reasonable charge.	Noted. The new Local Plan will update and consolidate 4 adopted local plans into a single document. It has been professionally desktop published with interactive links to make it easy to navigate. Copies of the Local Plan were made available online only during the	Local Plan reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan will also be prepared.

				Regulation 18 stage owing to Covid-19 and social distancing restrictions. This was in accordance with the Council's Statement of Community Involvement and planning law. The Council will seek to make hard copies of documents available at the Regulation 19 stage.	
Lee Manor Society	-	General	**Tone** The tone of the plan is understandably optimistic since its authors wish to be seen as envisaging a positive future for the borough. For community-based, seasoned participants in the planning process much of this, regrettably, rings hollow. Fine sentiments expressed in wide-ranging strategy documents of this sort rarely survive contact with reality. We appreciate that judgement is needed to balance conflicting priorities. But attempts to hold planners to broadly framed guidelines all too often founder on arguments that 'in this instance' the rules can be ignored. The current plan is to have a life of 20 years, twice that of the two previous strategic borough plans. This does reduce the workload for both officers and community groups but does run the risk of the plan becoming out of date in its final years. For no fault of its own the council faces severe financial restraints imposed by central government. Readers of the plan need to take this into account when considering the many fine sentiments expressed by the planners. Financial constraints presumably lead to planners highlighting the need for 'developer-led' schemes. This does not absolve council planners from insisting on compliance with stated policies.	Noted. The implementation of the Lewisham Local Plan will be kept under review throughout the plan period, taking into account the local performance indicators set out in Part 4 of the Local Plan. Progress and performance outcomes towards the delivery of the Vision for Lewisham and the spatial strategy will be published annually in the statutory Authority Monitoring Report (AMR). Planning Service resources are outside the scope of the Local Plan.	No change.
Lee Manor Society	-	General	A council that fails to enforce its planning decisions has, in effect, no planning policy. Recent experience has revealed a worrying lack of capacity in the planning **enforcement** department. Response to incidents has been slow or non-existent. This may have been due in part to Covid 19 but it needs to be rapidly remedied. Enforcement action needs to be speedy and effective to be of any use.	Noted. Planning enforcement is outside the scope of the Local Plan.	No change.
Lewisham Cyclists	-	General	**About Lewisham Cyclists** Lewisham Cyclists (LC) are the local borough group of the London Cycling Campaign (LCC) with more than 2500 supporters of whom over 700 are fully paid-up members of LCC. We speak up on behalf of everyone who cycles or wants to cycle in the London Borough of Lewisham and its adjacent local parks; and we speak up for a greener, healthier, happier and better-connected capital.	Noted. Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Lewisham Cyclists	-	General	**General comments on the plan:** Lewisham Cyclists welcome the opportunity to comment on the Lewisham Local plan. The focus of our response is around the Transport and Connectivity section of the plan, along with some specific comments regarding certain sites throughout the borough. We would also highlight our current campaigning objectives which align with a number of the proposals in the plan and would urge the council to integrate these into the local plan. Our comments about the overall plan can be found below, along with specific detailed comments on a number of individual sites in the Appendix provided.	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Lewisham Liberal Democrats		General	Many of the Lewisham Local Plan's aspirations are laudable. However, there are some potential problems, which need addressing.	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Lewisham Pedestrians	-	General	Lewisham Pedestrians the local campaigning arm of Living Streets and statutory consultees for highways and transport policy development in the borough.	Noted. Responses to the additional representations are set out	No change.

			We welcome the elements of the Local Plan that create opportunities for improvements in our built environment. The direction of travel in both 'planning' and architecture has been toward an understanding that it is the spaces between buildings where communities can grow. Our comments should both inform and the Local Plan and the Infrastructure Delivery Plan (IDP). Our comments and observations at this stage of the consultation on Lewisham's Local Plan are given as a community group that represents the interests of the 300,000 pedestrians in Lewisham. The spaces between buildings are mainly inhabited by people on foot and the points we raise relate to those spaces that blur the ideas of public and private realm. We have not provided comment on the aesthetics of new developments as we are confident that current guidance and regulation provided though the National Policy Planning Framework, the London Plan, the developing strategies of local Conservation Areas and your own draft Local Plan address these issues and that others within the community are better placed to comment. We have, however, additionally commented on the wider context of new developments in terms of the impact they have on the existing and developing infrastructure and policies in Lewisham and London. The Community Infrastructure Levy (and old Section 106) monies go a long way to fund the movement strategy in the Local Infrastructure Plan and (London's) Mayor's Transport Strategy as well as other infrastructure projects. We have, therefore, provided comment on the principles that should be employed in making spending choices for transport, health and green infrastructure projects.	elsewhere in this consultation statement.	
London Borough of Bromley	-	General	Thank you for the opportunity to comment on Lewisham's Regulation 18 Draft Local Plan. In summary, we consider that the draft Local Plan is a comprehensive policy document which has been underpinned by careful consideration and evidence. While we support the broad objectives of the draft plan, there are several aspects of the plan on which we would welcome further clarity.	Support noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
London Borough of Bromley	-	General	We look forward to engaging with you further in relation to cross-boundary strategic matters in the future, including further iterations of the Local Plan and the preparation of a statement of common ground.	Noted. The Council will continue to liaise with London Borough of Bromley through the Duty to Cooperate.	No change.
London Borough of Southwark	-	General	The LB Southwark supports the LB Lewisham's submission of new local plan for their area, to guide the spatial development of the borough to 2040. LB Southwark supports the Spatial Strategy, Vision and Strategic Objectives and associated Key Diagram as defined in the Draft Revised Lewisham Local Plan Regulation 18 stage "Main Issues and Preferred Approaches" document January 2021. Southwark supports the overall approach to the Lewisham Local Plan. It notes the need to be consistent in the approach and need to be involved in discussions over cross boundary issues. Overall, the structure and approach to the document is very clear and easy to understand how the policies will be implemented, reported on and monitored. The strategic objectives of the borough as set out by Lewisham are clear and supported by Southwark, and align broadly with our own vision for sustainable development.	Noted and support welcomed.	No change.
London Borough of Southwark	-	General	LB Southwark supports the continued partnership working through neighbourhood/area planning. LB Southwark supports the ongoing collaboration of both borough's plan making processes.	Noted and support welcomed. The Council will continue to liaise with London Borough of Southwark through the Duty to Cooperate.	No change.
London Wildlife Trust		General	The Trust has been active in Lewisham since 1981, and currently manages a nature reserve – New Cross Gate Cutting, under licence from Network Rail – in the borough, and a Lottery-funded project, the Great North Wood Living Landscape that features this site and a number of others on the Sydenham 'ridge', including Hillcrest Estate Wood.	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.

			We have participated in two of the on-line sessions that accompanied the Reg18 consultation; one on green infrastructure, the other on the west side of the borough, where most of our interest lies, thematically and geographically.		
London Wildlife Trust		General	The Trust fully acknowledges that as an inner London borough, Lewisham has to balance many competing demands and challenges, and that necessarily the objectives for the borough's natural environment have to take account of these. Nevertheless, we believe that the climate crisis, and the recognition of nature's contribution to people's mental and physical well-being give the 'green ambitions' of this Plan a stronger footing than for a long time.	Noted. The Local Plan includes a refreshed suite of policies in response to challenges of the climate crisis.	No change.
Make Lee Green	-	General	*Summary* Make Lee Green is a residents' group that supports measures to improve the health and quality of life of people in the Lee Green area and across Lewisham. We appreciate the opportunity to provide comments on the Lewisham Plan. The Plan identifies the right priorities for the borough. We fully support its aims of achieving safer, healthier, more inclusive and more sustainable communities. However we find there is a mismatch between the aims of the plan and the detail of the proposals and it lacks specific actions or targets that will enable the goals to be realised. In this response Section A provides general comments on the draft Plan while Section B sets out our suggestions for how it could be improved. We hope the Council will consider this as a constructive contribution to help meet our shared objectives.	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Make Lee Green	-	General	**About *Make Lee Green*** *Make Lee Green* is a self-organised group of residents based in and around the Lee Green area. We currently have around 50 active contributors and a social media following of over 700. *Make Lee Green* was originally formed to support the introduction of the Lewisham and Lee Green Low Traffic Neighbourhood (LTN). We have campaigned for the retention and expansion of the LTN and support measures that reduce pollution, make our streets safer and encourage active, cohesive communities. We are a YIMBY group. We want change, not just in our own back yards, but right across the borough and beyond. We want more social and affordable housing, more infrastructure to support active travel and more radical measures to reduce pollution and minimise climate change.	Noted. The Council's Infrastructure Delivery Plan sets out the framework for the delivery of infrastructure to support growth across the borough. This is published alongside the local plan. Also, the provisions for affordable housing are set out in the local plan. Part 2 Policy HO3 sets a strategic target for 50 per cent of all new homes delivered in Lewisham to be genuinely affordable.	No change.
Make Lee Green	-	General	**The Climate, Environmental and Social Challenges** Lewisham Council has taken a leading role in highlighting the climate emergency we all face. Without action the world is on track to be up to 5°C warmer by the end of the century. This is likely to be well within the lifetime of children being born in Lewisham hospital today. A failure to reduce this warming to well below two degrees will have serious implications for our ability to maintain life on large parts of this planet. Tackling this emergency requires radical action and a dramatic re-thinking of how we organise our lives and our communities. The UK has declared its aim to be carbon neutral by 2050. That means a substantial and sustained reduction in emissions for the period that the Plan covers. There is no other issue where an acknowledgement of what Martin Luther King called "the quiet urgency of now" is more essential. Other, more local environmental, social and health challenges are also pressing. Air quality is poor across much of the borough. Pollution contributes to thousands of deaths per year in London. Road traffic accidents are the leading cause of death for children and young people. Drivers kill around 2000 people in Britain every year and injure another 130,000. Housing is becoming increasingly unaffordable for families and young people. Shelter estimates that 1 in every 52 people in London are homeless. Lewisham has over 2500 families living in temporary accommodation. The Council's climate strategy identifies private homes and road transport as the two largest sources of carbon emissions. Unfortunately the Plan lacks credible measures to address either.	Noted. The Local Plan includes a refreshed suite of policies in response to challenges of the climate crisis. This reflects the Council's own ambition for the Borough to achieve carbon neutrality by 2030, and aligns with its Climate Change Action Plan. The Local Plan also includes new policies to address poor air quality and these are set out in Part 2. The provisions for affordable housing are set out in the local plan. Part 2 Policy HO3 sets a strategic target for 50 per cent of all new homes delivered in Lewisham to be genuinely affordable.	No change.

			The housing measures focus primarily on new developments, where-as we need to urgently upgrade our existing housing stock to make it energy efficient. For transport, cost effective solutions are readily available that support all of the objectives of the plan. These could be quickly and easily adopted and would reduce CO2, improve air quality, make our community safer and boost spending at local shops. The evidence for these measure is overwhelming and is outlined below.		
Make Lee Green	-	General	**The Political Context** The people of Lewisham have handed the Mayor and the Labour Party an overwhelming mandate to transform our community. This electoral mandate is likely to continue for the foreseeable future. While it is not appropriate for a document of this type to explicitly reference political agendas or specific manifestos it should not ignore the democratically expressed will of the people. Lewisham voters expect their elected council to deliver on its commitments and this Plan should be one of the tools used to turn those commitments into reality.	Noted. The Local Plan has been informed by the key priorities set out in the Lewisham Corporate Strategy.	No change.
Metropolitan Police Service	-	General	Lambert Smith Hampton (LSH) has been instructed by the Metropolitan Police Service (MPS) to make representations to the above consultation. This representation relates to S106/CIL contributions to mitigate impact on crime, the MPS' infrastructure requirement for a car pound facility within the London Borough of Lewisham and the emerging MPS infrastructure requirement for neighbourhood police facilities.	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Natural England	-	General	Thank you for your consultation request on the above Local Plan and associated documents dated and received by Natural England on 15th January 2021. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. **Natural England does not consider that this Local Plan (Main Issues & Preferred Approaches) and all the listed associated documents pose any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.** The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document. If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.	Noted. The Council will continue to engage with and consult Natural England as work on the Local Plan progresses.	No change.
NHS (HUDU)	-	General	Thank you for the opportunity to comment on Lewisham's 'Main Issue and Preferred Approaches' document. This response has been prepared in consultation with the South East London Clinical Commissioning Group (SELCCG). The CCG and other parts of the NHS look forward to continued engagement with the Council in the preparation of the Local Plan alongside wider involvement, for example, through Lewisham's Health and Care Partnership and the Health and Wellbeing Board. While this letter sets out comments on specific policies and issues within the consultation document, continued discussions with the Council will help ensure the plan reflects the challenges and opportunities for the health service and maximises its contribution to the physical and mental health and wellbeing of local communities.	Noted. The Local Plan seeks to ensure that sufficient infrastructure is in place to support the levels of growth planned over the long-term. The Council will continue to engage and work with the NHS to secure the delivery of infrastructure required for Lewisham.	No change.

			The Council's commitment to improving the health and wellbeing of the community and the recognition of the contribution the planning process can make to this is welcomed. Where possible comments are set out under the relevant chapter/section for ease of reference, however some do not necessarily fit within this format. Where we suggest specific wording alterations/additions these are shown in red italics.		
NHS (HUDU)	-	General	Health Impact Assessments should be required at an early stage for all major developments in areas of poor health and in areas of multiple deprivation (as shown in Figure 2.3) with evidence of how health and wellbeing is maximised and adverse impacts avoided or mitigated.	Noted.	Local Plan amended to include a new policy on Health Impact Assessments.
NHS Property Services	-	General	Thank you for the opportunity to comment on the above document. These representations are made by NHS Property Services (NHSPS) to the London Borough of Lewisham ("the Council") in respect of their Local Plan consultation on Main Issues. They follow on from site submissions made by NHSPS on the Call for Sites, November 2018. We ask that this response be read in conjunction with those comments previously made.	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
NHS Property Services	-	General	**Foreword** NHSPS manages, maintains, and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, and modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS. A key part of NHSPS' role relates to the provision of new healthcare facilities with the goal of ensuring that the healthcare needs of communities can be met. NHSPS works with commissioners, care providers and local councils to identify and respond to local healthcare and property needs. As such, it is involved in the acquisition and development of new facilities, and the redevelopment of existing facilities. Furthermore, NHSPS is required to dispose of land and property assets or facilities that have been identified as surplus to NHS requirements by Commissioners. This has resulted in the sale of 441 surplus properties, generated £381 million of sales receipts for the public purse and contributed to land sales supporting 6,607 housing units since April 2013. **Background** A proportion of the NHS estate in Lewisham does not meet suitable standards, meaning that patients are not receiving the level of care that is required: this includes primary care estate in Lewisham being assessed as unacceptable and either not capable of being improved or requiring major redevelopment; whilst some GP practices are either fully utilised or overcrowded. In line with Clinical Commissioning Group (CCG) Estate Strategies and the borough's Infrastructure Delivery Plan (2015), there is a clear aspiration to improve the standard of health provision within an integrated model of care, whilst also delivering what is required. There is limited capital funding available to do this. As such, the delivery of new facilities require the redevelopment of assets to release latent value to enable the delivery of modern Health Centres. Site allocations and supportive planning policies within the Lewisham Local Plan will play a vital role in facilitating this.	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement. The Local Plan seeks to ensure that sufficient infrastructure is in place to support the levels of growth planned over the long-term. The Council will continue to engage and work with the NHS to secure the delivery of infrastructure required for Lewisham.	No change.
NHS Property Services	-	General	**Closing** We trust these representations are informative at this stage of the new Local Plan preparation and will be taken into consideration. Should you require any clarification on the issues raised in these representations, please do not hesitate to contact myself.	Noted.	No change.
on behalf of Sydenham Scheme LLP the	-	General	We therefore welcome the principles of the regeneration of this area for employment and homes and that the policy does not rely on the confirmation of BLE to Sydenham to for this to come forward. In particular that the area is identified as a Focus for Regeneration and in the scenario of the BLE line	Support noted. The Council is a strong advocate of the BLE and the benefits that this will bring to	No change.

owners of the Coventry Scaffold			phase 2 the asterix annotation for Additional intensification in Bell Green. Plus the more specific guidance with the Stanton Square site allocation. We also support the proposal by Lewisham for Bell Green to become an Opportunity Area in the next review of the London Plan.	Lewisham residents. However the baseline level of planned growth within the Local Plan is not predicated on the delivery of the BLE.	
on behalf of Sydenham Scheme LLP the owners of the Coventry Scaffold	-	General	There are aspects of the Local Plan however where we consider greater flexibility of clarity is required in order to ensure the best form of development comes forward and in order to be consistent with the New London Plan and NPPF.	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Residents Drakefell and Gellatly Roads	-	General	We only found out about the consultation on the Lewisham Local Plan very recently and have not been able to put together a formal response to address all the points raised in it. In the interests of time, with the deadline for submissions being today, we would therefore like to make reference to excerpts from our previous correspondence with our local ward councillors. This is listed below in green. We would like it to be noted that this represents the views of all the 29 names who have undersigned the email to the ward councillors. Where email addresses are available, they are also cc'ed above. . Most of us have been unable to register our comments individually on the Commonplace website. There has not been time to share the detailed list of our proposals of solutions for the Drakefell and Gellatly corridor but we have shared these proposals repeatedly and consistently with ward councillors over the past few years. We would welcome the opportunity for further dialogue within the broader context of Lewisham Council going forward.	Noted. The public consultation was carried out in accordance with the Council's adopted Statement of Community Involvement. The consultation was promoted using a variety of means, including press notices, notification in Lewisham Life magazine, site notices and use of the Council's website and social media.	No change.
South East London Labour for a Green New Deal	-	General	We found this a difficult consultation because of the amount of supporting documentation. There is a draft Plan and a summary, plus 6 supporting documents, as well as a Lewisham Biodiversity Plan, Lewisham Biodiversity Action Plan, and a Sustainability Appraisal Scoping Report. There is an Impact Assessment (non-technical summary) which is nevertheless full of technical terms and acronyms which are not explained. Many key commitments are within this additional documentation e.g. sustainable retrofitting, which we believe should be a priority We accept this is a strategic document and the focus is on general strategies, but it is not clear the link between the proposed policies and the local developments and the application through the planning process remains to be seen. The consultation sets out Lewisham's diversity and inequalities very clearly. The COVID pandemic has exacerbated the existing issues. Tackling these inequalities must be at the heart of any Green New Deal and at the heart of any Lewisham Local Plan We support the ambitious nature of much of the plan, though we believe it can be strengthened as demonstrated by our comments. However the language is sometimes ambiguous and weak and does not recognise the climate emergency we face. In particular it is not strong and clear enough towards developers who have a track record of putting profit first. It must be clearly committed to tackling the climate emergency, and more definite and precise if it to work for the people of Lewisham	Noted. The new Local Plan will update and consolidate 4 adopted local plans into a single document. It has been professionally desktop published with interactive links to make it easy to navigate. The Local Plan is required by national planning policy to be justified by evidence and the Council has therefore prepared an extensive evidence base to support the preparation of the plan – this has been published as part of the consultation in the interests of transparency.	Local Plan reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan will also be prepared. Local Plan amended to provide more authoritative language where possible. For example, by stating that development proposals "must" rather than "we expect" or "should" or "will be expected to".
Sport England	-	General	Thank you for consulting Sport England on the above Please see our updated guidance on planning for sport. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=planning_for_sport_guidance	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.

			I am aware that Lewisham developed and adopted a Playing Pitch Strategy in 2019. While this is considered to be a robust and up to date evidence base for sport, it is important that it is kept up to date, and as such you should consider when would be an appropriate time to consider refreshing or updating this document. Sport England last attended a 'Stage E' meeting on this document over a year ago, and therefore another meeting would appear to be due.	Following the Regulation 18 public consultation Council officers have met with Sport England, and will arrange for a Stage E meeting on the PPS in due course.	
Sport England	-	General	**Uniting the Movement** Our new Strategy 'Uniting The Movement' is a 10-year vision to transform lives and communities through sport and physical activity. We believe sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all. We will be a catalyst for change and join forces on issues which includes connecting communities, connecting with Health and Wellbeing and Active Environments. The new strategy can be downloaded from our website here The strategy seeks to; <u>Connect Communities</u> We want more communities to enjoy the benefits of what sport and physical activity can do, both for individuals and the place where they live and work. Those benefits will come from a more bottom-up approach, working with – not doing things to – communities, and helping those affected to play a role in what happens in their neighbourhood and how it gets done. Active communities can be a powerful tool in building great places to live. <u>Connect with Health and Wellbeing</u>. We know that there are many organisations working to improve health and wellbeing, from the NHS to those in the voluntary and community sector, local authorities, employers and the commercial health and wellbeing sector. The strategy creates a potential to improve existing connections and explore new areas to help strengthen people's health and wellbeing, from childhood right through to older age. **Active Environments** Sport England considers that the planning system plays a vital role in shaping our built environment and that can play a big part in the movement of people and getting people active. Modern-day life can make us inactive, and about a third of adults in England don't do the recommended amount of weekly exercise, but the design of where we live and work can play a vital role in keeping us active. I note that Lewisham has committed to promoting inclusive and liveable neighbourhoods; helping people to move and be active is considered to be a large part of this. I also note that a design-led approach is promoted. We want to make the choice to be active easier and more appealing for everyone, whether that's how we choose to move around our local neighbourhood or a dedicated facility for a sport or activity. As part of Sport England's drive to create an active environment, we promote Active Design through all planning activity. Active Design is Sport England's contribution to the wider debate on developing healthy communities. Active Design is rooted in Sport England's aims and objectives to promote the	Noted. The Local Plan broadly supports healthy communities and active environments – this is reflected in the plan's key strategic objectives and in a number of policy topic areas, including on development design and public realm (which align with the active design principles), along with provision of community infrastructure.	Local Plan amended to refer to the Sport England Active Design planning guidance.

			role of sport and physical activity in creating healthy and sustainable communities. Active Design wraps together the planning and considerations that should be made when designing the places and spaces we live in. It's about designing and adapting where we live to encourage activity in our everyday lives, making the active choice the easy choice. Sport England has produced design guidance on 'Active Design' that can be downloaded from the website here. I note that the document suggests that development proposals should include public conveniences, free drinking water fountains and benches where appropriate – this is very much in line with Active Design principles and we would welcome a reference to our guidance in the Local Plan.		
Sydenham Society	-	General	The Draft Local Plan for the London Borough of Lewisham covering the next 20 years contains many positive policies with which the Sydenham Society agrees. However, in our view, the Plan does not adequately address a number of key issues: 1 Climate change In February 2019 Lewisham was one of the first London boroughs to declare a "climate emergency". However much of the Plan fails to address development adequately in light of this emergency. The Sydenham Society believes that in order to reduce greenhouse gas emissions and encourage genuinely sustainable development there should be a greater emphasis on the refurbishment and retrofitting of existing buildings, as described on p2. 2 Working life and Covid-19 In the last year, the effects of the pandemic have called into question the whole nature of working life in London and other large cities. According to recent reports, approximately 100,000 people have left, or intend to leave, London – in search of green space and larger, more affordable housing. One of the most recent is a UK Economic Outlook report published by PWC in January 2021 investigating future trends in city life and suggesting a significant downturn in the population of our capital city. In addition, more people are likely to be working at home in the future – particularly those in administrative and office-based jobs. This trend could trigger a further move out of London as people discover that if they don't have to physically be at work in a London-based office every day – or even to visit their office regularly – a further move out to the suburbs or towns away from London becomes inevitable. No one is suggesting that London is going to empty of people but if only a few per cent of city dwellers leave London because of new working patterns, the effect on housing targets could be profound. One only has to look at the sparsely populated office blocks in the City or at Canary Wharf (and the struggling retail units which support them) to see that this isn't a world of science-fiction but is actually happening now. 3 Brexit A significant number of Lewisham's residents moved to London from mainland Europe. Many will, in time, achieve settled status but others may choose to return to their countries of origin. Under the terms laid out by the Government in the Brexit agreement, it will be impossible for EU citizens without settled status to move to the UK without having secured a job which pays above a certain wage or is in a "reserved" area of work. What calculations have been made with regard to this significant segment of the Borough's population? Could it be, for example, that, if a significant segment of the population of the Borough is falling, more accommodation may become available, including more commercially rented property available to lower earners as it was in the past. Falling school rolls, for example, would give some clear early warning of whether the borough's population is changing in relation to Brexit as well as changes in working life.	Noted. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues. The latest evidence prepared by the GLA suggests that there will continue to be significant population growth in London over the long-term, which will need to be considered through the plan process. The Council is required to review its adopted Local Plan every 5 years and consider the scope for changes informed by monitoring and new evidence. The review process will allow for consideration of the longer term impacts of Covid-19 and Brexit.	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections. Local Plan amended with additional policy to emphasise the importance of sustainable retrofitting of existing building stock.
Telegraph Hill Society	-	General	We welcome the opportunity to set out the Telegraph Hill Society's response to the draft Lewisham Plan Regulation 18 stage "Main Issues and Preferred Approaches" document dated January 2021. We have generally sought to follow the order of the Plan although there are separate sections on general comments and on areas which we feel the Plan should address but does not. As a result of this, like the Plan, there is a degree of repetition.	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.

			2. Our views relate to the Plan as it affects the residents in the Telegraph Hill Conservation Area and therefore we do not seek to cover other policy areas such as social housing in detail.		
Telegraph Hill Society	-	General	66. We set out in Appendix 1 the basic criteria which CreateStreet's research has shown would lead to development which people feel would lead to healthy communities in which they would wish to live throughout their lives. We strongly urge that the Council's Development plan be re-written to take into account these principles as a "community-led" rather than a "design-led" and "housing target" led document which will not meet the Borough's Strategic Objectives.	Noted. The Local Plan broadly supports the delivery of healthy communities and liveable neighbourhoods – this is reflected in the plan's key strategic objectives and in a number of policy topic areas. The design-led approach is advocated both by national planning policy and guidance as well as the London Plan. The Local Plan Policy QD 1 is clear that developers should actively engage with communities likely to be affected by development proposals to respond to the local context and achieve positive outcomes. Part 4 of the Local Plan also makes clear that a wide range of stakeholders will be needed to support the delivery of the plan, including local communities.	No change.
Telegraph Hill Society	-	General	The terminology in this proposed Plan which turns the prohibitions of current UDP around to statements of support leaves the whole Plan open to bad development. We understand that both Government and the Mayor of London wish the Council to be more supportive of developers, but the UDP made it clear that poor developments would be rejected by the Council. This does not. A statement that, for example, the Council *"will support design-led plans"* does not mean that will not support plans which are simply profit-led, nor does a statement that the Council will support *"good development"* mean it will not also support bad development. 68. We believe that the previous approach was clearer and do not believe that it is the Council's role to support developers over and above supporting residents or other stakeholders who might be affected by a development. The Council has a duty towards its existing residents as much, or more, than to potential unknown future residents and property developers and, whilst there is much in the Plan about supporting development, there is nothing in the Plan about the Council supporting existing residents concerned about the impact of such developments. The imbalance against existing residents needs addressing. 69. If the Council is insistent in its proposed approach then the word "only" should be inserted in every case so that policies read *"The Council will only support …"* making it clear that, although the Council might not oppose bad development, it will never support it4. At present the word "only" is only used in some policies, implying that in other cases, where the word is not used, the Council may support anything. 70. A more general statement that the Council would oppose plans which do not conform to its policies would moreover be welcome and would ensure that the Plan is clearer, more even-handed and fairer to all.	The National Planning Policy Framework requires that local plans set a positive framework for managing growth and development to meet identified needs. It is considered that the Local Plan is consistent with the NPPF in this regard. Part 1 of the Local Plan clearly states that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise, in line with planning law.	Local Plan amended to provide more authoritative language where possible. For example, by stating that development proposals "must" rather than "we expect" or "should" or "will be expected to".
Telegraph Hill Society	-	General	A policy on enforcement appears to be missing. This omission needs to be rectified. Having development policies are effectively a waste of time if they are not enforced. This is particularly	Whilst planning enforcement is outside the scope of the Local Plan, the plan does set out that	No change.

			important as regards protecting our local heritage as set out in Strategic Objective F and policy section HE.	enforcement is one of the tools the Council will use to support the plan's delivery. Further details are set out in Local Plan Part 4 on Delivery and Monitoring.	
Telegraph Hill Society	-	General	APPENDIX 1 CREATE STREETS DESIGN GUIDE FOR HEALTHY COMMUNITIES APPENDIX 2 HATCHAM WORKS SITE: RESIDENTS' SURVEY INDEX Paragraph References to the draft plan REFERENCES	Supporting information noted. The Local Plan advocates for the Healthy Streets Approach, in line with the London Plan. The Development Management process for site allocations, and other sites, will provide residents and community groups to respond to planning applications.	No change.
Tewkesbury Lodge Estate Residents Association	-	General	I am writing on behalf of the Tewkesbury Lodge Estate Residents' Association, which speaks for almost 300 households around the site of the proposed development described in the Lewisham Plan as "the Havelock House/Telecom Mast/ Willow Tree House Site". Our Association is working closely with the Council to green our environment. We have raised the funds for 50 street trees which the Council has planted on our streets in the area of the proposed development. We are also working with the Council to develop a green area with the help of a Greening Fund Grant from the Council.	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Thames Water Utilities Ltd	-	General	Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above. As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory water and sewerage undertaker for the Borough and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document in relation to water and sewerage infrastructure (we will respond to the call for sites separately):	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
The Hatcham Society	-	General	The Hatcham Society welcomes the opportunity to respond to Lewisham's Local Plan to 2040. We appreciate that throughout the pandemic, council workers and councillors have worked tirelessly to keep our local community safe and we thank you for your work. We also recognise that the planning team and budgets have been downsized because of cuts from central government and commend you for the continued high level of work and care from your team. Our views relate to the Plan where it affects the residents in the Hatcham Conservation Area and therefore we do not seek to cover all policy areas in detail. This does not mean the society, or our residents, do not care about these policy areas. It means, as a volunteer society, we just do not have the time, energy and capacity to look in detail at all elements of Plan. In an ideal world, we would have liked to have spent more time poring over the consultation.	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
The Hatcham Society	-	General	Lack of engagement with the draft Plan We appreciate that the government has set the deadline of December 2023 for all local authorities to have a local plan in place and Lewisham faces a strict timescale. However, we do not believe that the council's consultation period was adequate for local residents to engage fully with the draft Plan. Despite the Plan consultation allegedly starting on January 15th 2021, we did not become aware of the consultation until late February. Lewisham Council has failed to provide enough time for local residents and societies to fully engage with the consultation with the majority of residents juggling childcare, home teaching, illness and job losses. Given the nature of this unprecedented time, we ask	Noted. The Local Plan Regulation 18 consultation was carried out in accordance with the Council's adopted Statement of Community Involvement. The consultation was advertised using a variety of means including press releases, notification in Lewisham Life magazine, the	No change.

			Lewisham Council to reopen and extend the consultation by a few more months to allow as many local residents to engage with the Plan as possible. Representation is a key part of democracy, and residents will not be represented if they are not fully consulted on this Plan which will shape their area for the next 40 years. When we attended the council's online meetings for the Plans, there were only around 30-40 residents in attendance. This consultation method did not make allowances for the majority of the borough's elderly residents who do not have access to the internet or computers. We are shocked by the sheer volume of Lewisham's Local Plan at 870 pages (not including the other documents for specific areas and topics) when the new London Plan comes in at 300 fewer pages. Lewisham's Plan is an inaccessible document due to its sheer volume. The ongoing pandemic will irrevocably change the face of London. We do not yet know the net population change within the capital following Brexit and Coronavirus. It seems misguided to come up with a long term plan for the borough during a time of seismic change. If the consultation is extended, we will have a better idea of what is happening with the capital's demographic and we would be able to respond with more confidence to the Plan.	Council's social media and site notices posted at proposed site allocations. Individuals and organisations on the Local Plan consultation database were also notified. The public consultation period was well in excess of the statutory minimum 6-week period. The Council is required to review its adopted Local Plan every 5 years and consider the scope for changes informed by monitoring and new evidence. The review process will allow for consideration of the longer term impacts of Covid-19 and Brexit.	
Theatres Trust	-	General	**Lewisham Local Plan Regulation 18 stage "Main Issues and Preferred Approaches" document** Thank you for consulting Theatres Trust on the above document. Lewisham is home to a number of cultural assets including valued theatres and performance spaces such as the Albany, Broadway, George Wood, Laban and London Theatres. Therefore the Trust has significant interest in the new Local Plan. Our detailed comments on specific sections of the plan related to our remit and interests are set out below. **Remit:** The Theatres Trust is the national advisory public body for theatres. We were established through the Theatres Trust Act 1976 'to promote the better protection of theatres' and provide statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2015, requiring the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre'.	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Telegraph Hill Society	-	General	In the subsequent drafts of this Plan, a key consideration will need to be the likely long-term effect of changes caused by the COVID-19 pandemic on London's projected population growth, on commuting and use of private vehicles and on shopping. The desirability of dense and high-rise developments, already under question as a result of the Grenfell Tower fire, are made even more doubtful by the ease with which this allows the spread of disease TELEGRAPH HILL SOCIETY RESPONSE TO THE DRAFT LEWISHAM PLAN Telegraph Hill Society 2 April 2021 Page 6 of 58 Furthermore larger properties with 'spare' office rooms will be required more often as home working increases and we anticipate an increasing demand for what would previously be regarded as three bedroomed houses as two bedroom plus office accommodation. The Borough may need to work with the Greater London Authority on this as it seems likely that the recently published London Plan, developed before the pandemic, is already out of date and therefore is an inappropriate basis on which boroughs should be basing their plans.	The Local Plan covers a 20-year period. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues.	Additional evidence base documents have been prepared to inform the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections.
Lewisham Pedestrians	-	IDP	**Principles for infrastructure spending – the Infrastructure Delivery Plan (IDP)**	Following the Regulation 18 stage consultation, officers have engaged with infrastructure providers to update the IDP, particularly to take	The Infrastructure Delivery Plan has been reviewed and amended with new information where possible.

			Commenting on the IDP is made difficult because much of it is out of date in terms of projects already identified, changed council policy and terminology of schemes. We will attempt to limit our comments to offer principles that should be followed. In relation to transport, the draft IDP identifies the potential for cycling to support the aim of increasing the proportion of journeys made by active and public transport to 82%. However, it fails to recognise that walking has a far greater potential than cycling and can be realised at far lower cost. Increasing the number of walking journeys made is the fastest, cheapest and simplest way to reach the 82% target for active travel in Lewisham – already, 12 times more journeys are made on foot than by bike so the smallest increase in walking will have the biggest impact on active travel levels. Funding for transport projects (CIL, s.106 and LIP3 as detailed in the IDP) should focus on equalities in an open and transparent way with any impact assessment being a genuine attempt to take a fresh look at priorities based on the protected characteristics identified in the Equality Act plus economic deprivation. All the schemes identified in the draft IDP need urgent review of their impact on people with the protected characteristics plus economic deprivation. Some of the schemes listed were agreed many years ago and should be reviewed in the light of changed societal, political, technological, legal and economic circumstances. Pedestrians overwhelmingly represent the protected characteristics above all other forms of movement (cycling, public transport, private vehicles, taxis, shared vehicles etc.). The particular groups that are represented in larger proportions of pedestrians are women, children, young people, old people and people economically deprived. Walking is the only form of transport that produces no harmful air pollution either locally or globally. The money spent on specifically pedestrian schemes has been poor in the past but changes in society regarding the impact of decisions made by public bodies regarding equalities issue should result in a massive shift of focus.	account of the latest borough-level population projections prepared by the Greater London Authority. The Local Plan sets out the strategic framework for the collection and spending of developer contributions, including Section 106 agreements and Community Infrastructure Levy. This is considered proportionate in scope for a development plan document. The Council may in the future review governance arrangements, taking into account the latest legislation and higher level planning policies, such as an update to the Planning Obligations SPD. It is noted that the Council has agreed governance arrangements for the spend of Neighbourhood Community Infrastructure Levey, which is considers to be transparent and democratic.	
Metropolitan Police Service	-	IDP	**Requirement for a car pound** The MPS have an infrastructure requirement for a car pound facility within Lewisham Council or surrounding boroughs. The requirement is for 6 - 7 acres of open industrial land (leased from private landlords or purchased freehold). A car pound facility is where the MPS deal with vehicles that have been stolen, seized for motoring offences or for forensic examination. The MPS are finding that the owners of their existing car pound sites are seeking to pursue development opportunities and cease the current use when the lease permits. Both of the current car pound sites are subject to pressure for industrial and/or residential development and intensification of use. The MPS are concerned that that if their existing car pounds have to be vacated, there may be no alternative sites available within London. This might mean that the MPS is no longer able to provide a car pound service, which would have serious implications for safely recovering and searching vehicles that are seized. The difficulties that exist in finding land for car pounds also extend to other aspects of policing, including the following: - Driver training; - Firearms training; and - Dog Training. The MPS are therefore requesting that Lewisham Council work with the police to identify suitable plots for the delivery of a car pound facility within the borough.	Noted. The requirement for this infrastructure will be included in a revised version of the Infrastructure Delivery Plan. The Council has reviewed this requirement and at this time is unable to identify land available to accommodate the 6-7 acres required for the facility. The Council will work with the MPS and other key stakeholders, including adjoining Boroughs through the Duty to Cooperate, to try and secure the delivery of this infrastructure.	Infrastructure Delivery Plan amended to include a new section on emergency services and identify need for car pound facility, as suggested.

			Further to the above, the MPS request that Lewisham Council's Local Plan and/or Infrastructure Delivery Plan (IDP) include a section highlighting the importance of the MPS car pound requirement in the borough.		
Metropolitan Police Service	-	IDP	**Neighbourhood police facility infrastructure requirement** The MPS have an emerging infrastructure requirement for a neighbourhood police facility that can provide a base of operation for officers of the MPS. Further information on the neighbourhood police facility will be disclosed soon.	Noted. The future requirement for a neighbourhood policy facility will be included in the Infrastructure Delivery Plan. It is noted that the MPS has submitted the Catford Police Station through the call for sites process for consideration as a site allocation, which has been included in the draft Local Plan.	The Infrastructure Delivery Plan has been amended to include a new section on emergency services, taking into account the feedback received. Local Plan (South Area site allocation for Catford Police Station) amended to allow for community uses, in order to support the retention or re-provision of the existing policy facility on site.
Metropolitan Police Service	-	IDP	**Summary** MPS is working hard to achieve cost savings and find new and alternative sources of capital and revenue funding to support policing in London. S106 / CIL charges to support policing at Borough level are necessary and appropriate. As such, we ask that this be accounted for. The MPS have an infrastructure requirement for a car pound facility and are requesting that the Council work with the police to identify suitable plots. The MPS would like this infrastructure requirement to be referenced in the Local Plan and/or IDP. The MPS also have an emerging infrastructure requirement for a neighbourhood police facility which will be disclosed soon. We consider that it would be sensible to arrange a meeting to discuss how the MPS car pound infrastructure requirement can be accounted for in the borough and the potential for a site allocation in the future. We will look forward to hearing from you when you have had a chance to review the contents of this representation.	Noted. Part 4 of the Local Plan sets out a list of areas where planning obligations may be sought and this includes community safety measures. The Infrastructure Delivery Plan will be updated to include a new section on emergency services, which will help to provide a link to related spending for strategic infrastructure.	Infrastructure Delivery Plan amended to include a new section on emergency services.
Sport England	-	IDP	The Infrastructure Delivery Plan should be informed by the borough's evidence base for sport, including the Lewisham Playing Pitch Strategy. I note that the document states that more sport and recreation facilities, including playing pitches, will be needed over the long term – the type and location of these facilities should also be informed by the PPS as well as facilities planning model work recently carried out.	Noted. The preparation of the Infrastructure Delivery Plan has been informed by the Council's evidence base, including the Playing Pitch Strategy. The PPS was prepared in consultation with Sport England. It is acknowledged that a Stage 3 meeting is required, and officers will arrange to meet with Sport England accordingly.	No change.
Environment Agency	-	IIA	**Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) feedback** The SEA/SA report from 2015 should be updated to ensure the emerging local plan policies and site allocations are based on an accurate and sound evidence base. We recommend the following plans and strategies are added to the SEA/S process and demonstrate how they have been considered to inform the development of the new Lewisham local plan. **Sustainable development goals to transform our world** The Sustainable Development Goals are a call for action by all countries – poor, rich and middle-income – to promote prosperity while protecting the planet. They recognise that ending poverty must go hand-in-hand with strategies that build economic growth and address a range of social needs including education, health, social protection, and job opportunities, while tackling climate change	The SEA/SA Scoping Report was updated as part of the Integrated Impact Assessment on the Regulation 18 Local Plan: Main Issues and Preferred Approaches document. The IIA included a review of the SEA/SA framework, which statutory consultees were invited to comment on. The key plans and strategies listed in the representation will be signposted and considered in the next IIA	IIA report amended to signpost and consider key plans and strategies, as suggested.

			and environmental protection. More important than ever, the goals provide a critical framework for COVID-19 recovery. https://www.un.org/sustainabledevelopment/ **The government's 25 year Environment Plan** https://www.gov.uk/government/publications/25-year-environment-plan **EA2025 action plan** https://www.gov.uk/government/publications/environment-agency-ea2025-creating-a-better-place This plan, EA2025, translates our vision for the future into action. We will protect and enhance the environment as a whole and contribute to sustainable development. Through this we will contribute to the United Nations Sustainable Development Goals and help protect the nation's security in the face of emergencies. The plan sets out 3 long term goals: - a nation resilient to climate change - healthy air, land and water - green growth and a sustainable future These goals will drive everything we do today, tomorrow and to 2025. They champion sustainable development, support our work to create better places and challenge us to tackle the climate emergency and deliver a green economic recovery for everyone. **National Flood and Coastal Erosion Risk Management Strategy for England (2020)** https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2 The Strategy has three core ambitions concerning future risk and investment needs: 1. **Climate resilient places:** working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change 2. **Today's growth and infrastructure resilient in tomorrow's climate**: Making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as resilient infrastructure. 3. **A nation ready to respond and adapt to flooding and coastal change**: Ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action. **The New London Plan March 2021** should be added to the scoping report. https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021 **Water Framework directive status** Sustainability Requirements, Issues and Trends - Water and Rivers/Waterways It is positive that Water Quality has been identified as a Key Issue within the borough. Lewisham contains significant parts of the Ravensbourne and its tributaries. There are multiple hotspots within the borough e.g. ongoing misconnections - that would benefit a long-term strategy as to how this issue could be tackled with Lewisham council utilising Building Regulations and stricter Planning enforcement to prevent future misconnections. Similarly plans to develop the habitats within waterways would be beneficial to over water quality and WFD status. They could for example include more detail on how they plan to do this - removing	report, as part of the iterative appraisal process.	

			concrete channelling and reintroducing natural bed and margins to previously channelled watercourses, removing weirs and other barriers etc. These pertain mostly to objectives 12, and 13 (Table 4: SA Objectives and Indicators). Objective 12: Additional indictors to consider - WFD Ecological Status of waterways WFD Chemical Status of waterways Area of 'naturalised' waterway bed & banks (km of river enhanced) Area of accessible waterway to the public to enjoy Number of barriers to fish passage removed Objective 13: Additional indictors to consider WFD Chemical status of waterways Number of known misconnections - number resolved Please note the baseline data on page 8b states that 'The only watercourse in the Borough currently designated under the chemical General Quality Assessment is the section of the River Ravensbourne between the River Pool and the Tideway." Please note that the Environment Agency also has extensive monitoring data within the larger catchment which can be utilised as baselines data. The baseline data should take into account the current WFD Ecological and Chemical status of each of the WFD waterbodies within the catchment. This monitoring data is more up to date. I recommend ensuring your baseline data is reliable and up to date with the current data available (latest WFD classifications from 2019). https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3369 WFD waterbodies within Lewisham with available monitoring data Ravensbourne (Catford to Deptford) (GB106039023270), Pool River (GB106039023250) Ravensbourne (Keston to Catford) (GB106039023260) Quaggy (GB106039023290) GR3 Biodiversity and access to nature This WFD evidence should be used to identify what actions/policies are required through the spatial planning process at policy and planning decision stage to improve the water environment over the lifetime of the new local plan. **Resources and waste strategy for England (December 2018)** https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england **Serious and organised crime: 2018 review** - The final report includes recommendations for a strategic approach to serious and organised waste crime. https://www.gov.uk/government/publications/serious-and-organised-waste-crime-2018-review **Water Drainage and Wastewater Management Plans (DWMPs)** Water Drainage and Wastewater Management Plans (DWMPs) which are the new way for Water and Sewerage Companies (WaSCs) to plan for the future of drainage, wastewater and environmental water quality. DWMPs will be a key part of the evidence base to inform new local plan policies and planning decisions on new development and growth.		

			Page 8b quotes figures we supplied for water consumption for 2009-10 and the average in 2005-10. The footnote refers to Thames Water's Water Resource Management Plan of 2010 which has been superseded twice. The consumption figure for 2019-20 is 143 litres per person per day and the latest five year average is 147 litres per person per day. Link to the latest strategy below. **Water resources strategies** Thames Water Resources strategy https://www.thameswater.co.uk/about-us/regulation/water-resources#current Thames Estuary 2100 (TE2100) briefing for London Borough of Lewisham (2020) The TE2100 Plan aims to: ▪ manage the risk of flooding to people, property and the environment ▪ adapt to the challenges of climate change ▪ ensure sustainable and resilient development in the floodplain ▪ protect the social, cultural and commercial value of the tidal Thames, tributaries and floodplain ▪ enhance and restore ecosystems and maximise benefits of natural flood The role of councils Each council has a set of objectives which will help them deliver the recommendations in the Thames Estuary 2100 Plan. These objectives include: ▪ developing a vision for the future riverside, using the riverside strategy approach updating strategic planning documents, such as local plans and strategic flood risk assessments, to include Thames Estuary 2100 messages ▪ requiring developers to improve flood risk management structures through development. ▪ safeguarding land for future flood management ▪ agreeing riverside habitat enhancements through development A riverside strategy approach to riverside development The Thames Estuary 2100 Plan introduces the riverside strategy approach. This integrates improvements to flood risk management defences into wider redevelopment, enhancing the social, environmental and commercial aspects of the riverside. The Environment Agency is encouraging councils and strategic planning authorities to use this approach to: ▪ improve flood risk management in the vicinity of the river ▪ create better access to and along the riverside improve the riverside environment		
Quaggy Waterway Action Group	-	IIA Non-technical summary	**Biodiversity and green infrastructure, pages 10 and 11:** As discussed, the assumption is that higher growth under Scenarios 2 to 6 would be achieved via higher densities at the same package of sites that would deliver Scenario 1, as opposed to through additional allocations, which potentially serves to reduce concerns in respect of higher growth scenarios conflicting with biodiversity and green infrastructure objectives. However**, certain concerns still remain, recognising that higher density development can mean less space available within site boundaries for green and blue infrastructure.** **This is particularly a concern on account of the fact that the central spine and transport corridor that would see incrementally higher growth under Scenarios 2 to 6 is also a river valley, associated with the Rivers Ravensbourne and Pool, and is associated with a network of linked greenspace; indeed, it is identified as a strategic green infrastructure corridor by the All London Green Grid Framework.** Issues associated with higher growth in proximity to the river corridors are discussed further below, but suffice to say here that **there are issues associated with certain sites at Lewisham, along the A21 corridor, at Catford and at Bell Green**.	We believe that promoting high density development within central, highly accessible areas is an appropriate and holistically more sustainable approach than the other options tested. Lewisham's housing targets like all London boroughs is informed by the London Strategic Housing Land Availability Assessment (SHLAA). It can be assumed therefore that when land that is available for development is delivered through the plan period subsequent	No change.

			However, on the other hand, **growth can support investment in green infrastructure**, e.g. a high growth strategy at BGLS could support the aspiration to enhance the South East London Green Chain, which is a GI corridor that skirts the southern edge of this area; and **growth at Catford should assist with realising opportunities to deculvert and naturalise the River Ravensbourne. These opportunities are potentially highly significant.** In conclusion, **it is appropriate to highlight lower growth scenarios as preferable on balance, given risks associated with intensification along river corridors (also in proximity to railway embankments and cuttings, which are often designated as a Site of Importance for Nature Conservation, SINC) although there is much uncertainty in light of growth related opportunities, e.g. river re-naturalisation.** Also, there is uncertainty on the basis that **lower growth in Lewisham could lead to increased pressure for housing elsewhere.** For these reasons **significant negative effects are not predicted for the higher growth scenarios.** **QWAG Comments:** How safe is the assumption that lower growth in central Lewisham would mean more pressure elsewhere when there is no prospect that growth pressures will not continue in all locations? That assumption seems to be wishful thinking because there is no suggestion that demand for development will subside once the Plan has accommodated the growth planned for. The statement that 'growth can support investment in green infrastructure' is fine until the theory is tested by whether the Plan's polices are adhered to and implemented on the ground. That may happen but is far from certain to be the case given that major opportunities have been lost to restore rivers and the natural function, and preference has been given to installing easy-to-maintain features, hard surfacing and bland landscaping often planted with vegetation of low or no ecological value. Examples where such opportunities have been missed include: - Lewisham Gateway where river remains in concrete albeit less deep and ecologically dead than before - Conington Road – Tesco site, where river restoration was promised in public consultations but has been negotiated away - the Silver Road / Axion House site, where river restoration has also been found to be too hard - Catford Green where the river remains in deep concrete and the only measures have been to scatter gravel on the concrete riverbed, much of which was washed away in the first heavy rains, with some hedging, trees in large litter-strewn planters and amenity planting that was poorly plane and is not well maintained. The wording of the Plan policies remains ambiguous as to the actual intention to require genuine river restoration and ecological improvement as opposed to hard landscaping and amenity planning of limited ecological value.	housing targets may fall in the future as a result of a lack of developable land. The Council will continue to secure improvements to and create new green infrastructure where appropriate and push for river restoration in line with our adopted SPD on appropriate sites.	
Quaggy Waterway Action Group	-	IIA Non-technical summary	**Development pressure on green spaces** Paragraph 10.5, page 359 "As the Borough's population **increases the pressure on existing parks and open spaces will invariably rise**. The Lewisham Open Spaces Assessment (2019) considers the amount of open space that is needed to support the projected future population over the plan period, based on a fixed quantity standard. This suggests that **a significant amount of additional provision will be required to maintain the standard over the long-term**. Due to the finite availability of land and pressure to accommodate new development, such as for housing and workspace, **there will be limited opportunities to create new open space**. It is **therefore vitally important that open spaces are protected, measures are taken to improve their functional quality, and that public access to open space is enhanced."** **QWAG comment:** Is it 'inevitable' that development pressures on existing green spaces will rise? That will happen if the Council allows that to happen and has the vague policies and weak practices to ensure such an	The Local Plan sets out a positive strategy for managing future growth and development across the borough, consistent with the Good Growth policies set out in the London Plan, and the principles of sustainable development set out in national planning policy. The Local Plan is legally required to be consistent with the National Planning Policy Framework and in general conformity with the London Plan.	No change.

			outcome. Surely, the very purpose of the Local Plan is to ensure that a range of aims and needs are met. Notwithstanding central government's policy preferencing land for housing over other uses, and the pressure the Council is under to accommodate the housing figures it has been handed, it does not make sense for people living in new housing to be denied access to nature and quality green space nearby, and allowing this to happen causes other significant pressures and costs. How would letting that policy run affect other important issues such physical and mental health, let alone other benefits green space provides such as urban colling and shade, reducing flood risk, helping to improve conditions for nature and string carbon? How has the Local Plan been tested to see how that assumption would play out? This is as much about strong protection for existing spaces and improving their condition and amenity, and firm design standards for green space within all new development, including ensuring people know they can use spaces for outdoors recreation from food growing, gardening and formal and informal learning and development of skills, reading a book, etc. It should be the role of the Local Plan and related design standards and supplementary guidance to ensure that the current inequitable provision of local green space is not carried forward in the next generation of physical development. It is not clear how the Plan will ensure that the deficiencies in 2020-21 will not be rolled forward over the Plan's lifetime. It is also unclear from the Plan how the quality and function of spaces will be improved, how that will be assessed and implemented. Given the Plan's negative stance toward the potential to create new green space, it is also unclear how the Council and the Plan will ensure that spaces are better connected through green / blue corridor enhancements. If there is no space for green space, what space exists to link up and better connect what exists? ▪ Overall, the Plan says a lot of the right things without any sense that anything will happen other than a mass of development of dubious benefit. The nest iteration of the Local Plan will need to address this substantial flaws, ambiguities and uncertainties.	Lewisham like all London Boroughs is facing a Housing Crisis and needs to build many more homes. Particularly genuinely affordable homes. The London Plan set Lewisham a Housing Target of 1,667 new homes per year. The Local Plan recognises that as an Inner London Borough and due to the finite amount of land within Lewisham there will be limited opportunities to create new open space. However the Council will continue to secure improvements to open spaces from development and create new green infrastructure where appropriate.	
Quaggy Waterway Action Group	-	IIA Non-technical summary	**Communities 3 (Accessibility), pages 12 and 13:** There are areas in the Borough experiencing multiple deprivation that could benefit from the investment associated with new development, particularly in terms of delivering new and enhanced infrastructure, including community infrastructure, and employment opportunities. The importance of delivering new and enhanced green infrastructure is also not to be under-estimated, particularly in light of the lock-down experience of 2020. Higher growth at BGLS (Scenarios 5 and 6) represents a particular opportunity in this respect, recognising that this area falls within the defined Strategic Area of Regeneration that covers the south-eastern part of the Borough. The BLE Local Economic Impact Assessment (LEIA, 2020) identifies that a BLE station would bring with it a 'dramatic rise' in the Healthy Streets score currently assigned to immediate environs of Lower Sydenham Station, and it may be that a masterplanned higher growth strategy for the area could lead to benefits over-and above those envisaged by the LEIA. It is also likely that a higher growth strategy could help to ensure that benefits accrue for existing communities well-beyond the 1km zone, surrounding the station, that is the focus of the LEIA. A tall buildings cluster could bring with it a new town centre, which could significantly improve the ability of nearby communities to access services, facilities, retail and employment. The new community would also benefit from excellent access to green and blue infrastructure, in the London context, with the Pool River adjacent and Beckenham Place Park (which might potentially form part of a new Regional Park in the future) a short distance to the south. One of the proposed allocations - Sydenham Green Group Practice - does comprise an existing large health centre; however, it is assumed that development would re-provide and potentially help to support the improvement of health infrastructure, linked to the public sector estate programme. With regards to Catford, which is associated with a notable concentration of multiple deprivation, the proposal under Scenarios 1 and 3 is to assign indicative residential densities to the four sites within	As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.

			the Catford Town Centre Masterplan Area that accord with existing levels of public transport accessibility, on the basis that this will be supportive of wide ranging regeneration objectives. There could potentially be benefits associated with a higher growth strategy; for example (and in particular), a higher density scheme at Catford Shopping Centre and Milford Towers could help to ensure that net losses of main town centre uses (currently 13,699 m2) are minimised (recalling that the proposal is to re-provide main town centre uses within this location such that these uses comprise 33% of the total floorspace of the redevelopment scheme – see paragraph 5.3.15, above). However, benefits of a higher growth strategy for Catford are uncertain, as there is a need to consider the town centre's particular character and role, with its focus on civic and cultural functions, and its relationship with nearby Lewisham. The BLE LEIA (2020) discusses wide ranging opportunities that would result from a BLE station (also noting that realignment of the South Circular can be assumed, as it has Government funding), but it is difficult to conclude that benefits would be realised more fully or enhanced under a higher growth scenario. There are also opportunities associated with the A21 corridor, where the aim is to transform the main road corridor and its environs into a series of liveable and healthy neighbourhoods. Particular opportunities include delivery of cycling Quietways and better linking neighbourhoods to large open spaces; however, it is difficult to suggest opportunities associated with a slightly higher growth strategy (Scenarios 5 and 6). In Lewisham a key site is Lewisham Shopping Centre, where the proposal is for a high density scheme (450 dph, reflecting high PTAL) that will ensure a net gain in main town centre uses (currently nearly 45,000 m2), and there could be benefits to a modestly higher density scheme still (10% uplift) to secure a further net gain in town centre uses. In conclusion, numerous proposed allocations will deliver enhancements to community infrastructure, green infrastructure, transport infrastructure or the urban realm, hence it is possible to predict significant positive effects under all scenarios, albeit with a degree of uncertainty at this relatively stage in the plan-making. Scenarios 5 and 6 are identified as performing particularly well, as there is a particular opportunity in the south of the Borough; however, there remains a degree of uncertainty regarding effect significance ahead of masterplanning for BGLS. **QWAG comment:** This section contains lots of 'coulds' and 'woulds' but unless the Plan brings forward clear and firm policies backed up by the internal wherewithal to deliver they will remain aspirational snapshots of what might be. The Plan's section on delivery needs to be clear about how the Council will step up to be capable and competent to ensure rounded policies are enacted especially to address the ecological and climate emergencies and the consequences these have from inequalities, public health and the use of funds. We accept that the Covid-19 pandemic and lockdown have opened many eyes to the value of green and blue open spaces but the reference to "the importance of delivering new and enhanced green infrastructure" is odd given that the Council will have been aware of this long before the pandemic. It is fine if added impetus is to be given to this important area - and the Council's commitment is underlined - but if that is the case it is not clear how this is reflected in the Plan with its talk of how hard it is to protect and secure green space, for instance.		
Quaggy Waterway Action Group	-	IIA Non-technical summary	**Conclusion on the Draft Local Plan, page 19:** Whilst there can be 'win-win' opportunities, including in respect of climate change mitigation (heat networks), **biodiversity / green infrastructure (e.g. river deculverting)** and, in some cases, heritage, **there are other environmental objectives for which growth leads to an inherent tension, perhaps most notably flood risk**. It will also be important to recall that there can be tensions between competing socio-economic objectives, including objectives relating to changing / 'balancing' local economies on the one hand, whilst meeting the needs of existing communities, including more vulnerable communities and groups within the population, on the other hand; however, **tensions of this nature can often be resolved through careful plan-making, e.g. stringent DM policy** *(Development Management)* **and masterplans for key areas of change**. **In respect of DM policy, it will**	We do not agree with your assessment of the development delivered in the borough.	No change.

			be important to ensure that the stringency of policy aligns with the inherent locational constraints at proposed allocations (e.g. flood risk), and that DM policy feeds into decisions in respect of indicative densities. In respect of masterplans, the Local Plan will need to align with the emerging Catford Town Centre Masterplan, taking careful account of the very specific characteristics of Catford Town Centre that are being established through the masterplanning process. **QWAG comment:** Once again, this section of the Plan contains nice aspirations without any certainty that anything will be delivered in the face of development pressures where the majority of developers are reluctant to do anything beyond the bare minimum and what their viability tests will permit. Too many developments are substandard from the start in build quality / finish, energy efficiency and provision of quality green spaces (as opposed to low value amenity planting which most developers and their advisers are used to imposing on communities) and the Council will need to up its game to ensure that the quality of development rises. What will the Council do to ensure that its own capacity and competence rises?		
Quaggy Waterway Action Group	-	IIA Non-technical summary	**Cumulative effects, page 20** **Green Infrastructure** - linked to the above, there is an opportunity to work in **collaboration with LB Bromley (in particular, given the BGLS strategic growth opportunity) and LB Greenwich in respect of realising the opportunity to enhance the South East London Green Chain to Regional Park status**, which is a strategic opportunity set out within the All London Green Grid Supplementary Planning Guidance (SPG). This opportunity would also accord with the aspiration for London to become the World's first National Park City, as set out within the emerging London Plan; **and could also be supportive of taking a catchment-wide approach to managing flood risk in Lewisham (on the basis that greenspace in LB Greenwich and LB Bromley is upstream of locations in Lewisham where there is a risk of flooding)**. **QWAG comment:** As stated elsewhere, London is already the world's first National Park City and the Council, and the Plan, should be setting out now what it will do within its borders and with others to contribute. Cooperation with Bromley and Greenwich would be a good thing but those boroughs tend to be unresponsive on many matters such as the Ravensbourne Catchment Plan.	Noted. We believe the Local Plan provides a robust policy framework to contribute to London's aspirations as a National Park City.	- Report amended to recognise that that London is the worlds first National Park City
Quaggy Waterway Action Group	-	IIA	Page 18: **Tensions between growth sceneries and the achievement of certain sustainability objectives are acknowledged, and the Local Plan therefore proposes to include detailed policies that support the**	We believe the Local Plan provides a robust policy framework to	No change.

		Non-technical summary	**spatial elements of the plan, and will provide greater certainty about the outcomes sought by the Local Plan, and how impacts should be managed and mitigated**. For example, and in particular, policies for employment land will help to ensure that the development and use of land is effectively managed, so that identified long-term needs for business and business space can be met whilst promoting a more inclusive economy. A positive and proactive approach is advocated by the plan to grow the local economy, building on the area's economic strengths, and recognising the potential for the BLE to drive forward economic development. **The Local Plan also aims to provide a coherent local framework for responding to the climate emergency, including detailed policies around the protection and enhancement of green infrastructure to deliver net gains in biodiversity**. **QWAG Comments:** Are the detailed policies in place? It's not clear that they are, or that they are the right policies. For example, river restoration is referred to but is ambiguous as to what will actually happen. The next versions of the Local Plan and the LBL infrastructure development plan (IDP) should include complete lists of river and blue restoration starting with the projects set out in the Ravensbourne Catchment Improvement Plan. There are frequent references to green infrastructure and amenity, but it remains unclear how that will be planned to address ecological need and deficiencies instead of resulting in easy-to-maintain, superficially attractive visual greenery and the use of rivers as walkways and viewpoints but without rivers being properly restored physically. How will the Local Plan's approach to Biodiversity Net Gain be measured in ecological and climate terms? What tools will be used to assess both and made central to the way the Council works? The next version on the Local Plan should be unambiguous about the policies and practices which will ensure that the tensions described are overcome, and the development meets the various needs of society, not simply in housing terms.	protect and enhance the boroughs green and blue infrastructure. The Council will continue to secure improvements to and create new green infrastructure where appropriate and push for river restoration in line with our adopted SPD on appropriate sites.	

Lewisham Local Plan

Regulation 18 consultation statement

Appendix 2 – Regulation 18 Draft Local Plan Written Responses Split Part 1

September 2022

Organisation (if relevant)	Part	Section, policy or paragraph	Comment	Council officer response	Action
Blackheath Society no 2	1		Endorse idea of Good Growth. 'Open Lewisham' is vague/uninspiring (page 15).	Support noted. The draft Local Plan strategic objectives and spatial strategy provide further details on 'Open Lewisham' which both refers and helps give effect to the Council's currently adopted Corporate Strategy and the Corporate priorities contained therein.	No change.
Blackheath Society no 2	1		Fails to recognise possible big impact of covid and Brexit on future growth/mix	Noted. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues. The Council is required to review its adopted Local Plan every 5 years and consider the scope for changes informed by monitoring and new evidence. The review process will allow for consideration of the longer term impacts of Covid-19 and Brexit.	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections
South East London Labour for a Green New Deal	1		The plan could adopt and support emerging neighbourhood planning ideas, such as the Deptford Work Anchors included in the Deptford Neighbourhood Plan under consultation (integrating co-working spaces, studios and space for local production, up-cycling, repairing and re-purposing of old or faulty goods, becoming centres for a more circular economy as well as arts and culture and encouraging further integration of child-friendly places and play provision, as well as public health and well being facilities).	The Local Plan is being prepared in accordance with the Council's adopted Statement of Community Involvement. The Council has taken into account emerging Neighbourhood Plans and used them to inform the draft Local Plan, particularly the Part 3 policies. This is in line with national planning guidance. However, it is the role of the Local Plan to set the 'strategic policies' for the Borough, and Neighbourhood Forums are encouraged to prepared Neighbourhood Plans with non-strategic policies to help support the delivery of the Local Plan.	No change.
Blackheath Society no 2	1	-	Nothing on need for good cross-border cooperation with Royal Borough of Greenwich, despite boundary running through Village and across Heath	Noted. The Council has and will continue to engage with Royal Borough of Lewisham through the statutory Duty to Cooperate.	No change.
Blackheath Society no 2	1	-	"We are producing a new Local Plan to • Respond to changes in **wider planning context** *YES* • Respond to the **Climate** Emergency *YES* • Meet needs for genuinely **affordable housing**, **jobs**, and **community facilities**, incl high quality **green spaces** *YES, but what happens where these conflict?* • Secure delivery of **BLE & other transport infrastructure"** *YES, but too much emphasis on BLE (750 refs), uncontrollable by LBL.* How are all these big issues to be prioritised, especially when they clash?	The draft Local Plan sets out the reasons for the Local Plan review. They are not listed in order of priority or intended to be read as such. The Local Plan seeks to deliver Good Growth and sustainable development in accordance with higher level planning policies.	No change.
DNA	1	-	**01** We welcome the Council's explicit statement to work with local communities and community groups involved Neighbourhood Plan to improve transparency and openness in decision-making, and to foster greater public understanding of and involvement in the planning process. We ask the Council therefore to develop objectives and policies supporting the continuous and meaningful engagement in planning matters. We ask the	Note. The Council's adopted Statement of Community Involvement sets out how the public will be consulted on the preparation of planning documents and planning applications. The SCI is subject to periodic review. Draft Local Plan policy HO4 on housing estate maintenance, renewal and regeneration is clear that the London Mayor's Good Practice Guide to Estate	No change.

			Council to make the application of its Residents' Charter a policy to be applied in Estate Regeneration and mayor development on public land.	Regeneration must be adhered to. This will ensure residents are appropriately engaged with and consulted on estate regeneration schemes.	
South East London Labour for a Green New Deal	1	-	We accept there is a difficult balance to be maintained between providing genuinely affordable homes, modern workspaces and jobs, and community facilities in the context of a growing population, which also tackles deprivation and inequality.	Noted.	No change.
Telegraph Hill Society	1	-	We have set out above our overall concerns that this is not what a Vision, Strategy and Plan should be. Notwithstanding this we have made specific comments based on the existing Vision and Strategic Objectives in this section	Noted. Responses to additional comments set out elsewhere in this Consultation Statement.	No change.
Make Lee Green	1	-	**The Aims of the Plan** *Make Lee Green* fully supports the overall aims and objectives of the Plan. Delivering "inclusive, safe, healthy and livable neighbourhoods" is exactly the right priority, as is the need for people-focused development. We welcome that the plan acknowledges the climate emergency. Delivering on these aims requires leadership and a commitment to action. While we accept that the Plan is an over-arching framework, for a document of 870 pages it is surprisingly light on detail on how the aims will be delivered. The policies that are set out are mostly vague or heavily caveated. This is in danger of being a huge missed opportunity. As well as a lack of clearly defined actions, the Plan has few specific targets or timescales. We don't except to see fully defined actions over the full 20-year period, but it is reasonable to expect some indication of what progress will look like over say the next five years. What are the metrics for success? How much will this Plan contribute to making Lewisham a carbon neutral borough? How many affordable houses will be built? Without targets and timescales, it is much less likely that any action will be taken to meet the aims of the Plan. It is also important to know where we are starting from. The Plan includes some excellent spacial data but lacks baselines or trends for CO2 emissions, air pollution, traffic volumes or street crime. This data is readily available. For example Lewisham has the worst Healthy Streets score of any inner London Boroughii. Including this type of baseline data would give a better sense of the scale of the problems and the likely impact of the Plan.	Support noted. Part 4 of the draft Local Plan includes a Monitoring and Review framework. This sets out measures and indicators to assess performance in delivery of the Local Plan. The Council is legally required to prepare an Authority Monitoring Report (AMR), looking at performance against these metrics, which the Council will publish annually. The Council is required to maintain an up-to-date Local Plan and review its adopted plan at least every 5-years. Any future review and update to the Local Plan will be considered taking into account findings of the AMR and changes in higher level policy and legislation. The Council has prepared and compiled an extensive evidence base which has been used to inform the preparation of the Local Plan. The evidence base is available on the Council's planning webpages. The Local Plan signposts key findings of this evidence, where they support the justification for the policies.	No change.
Climate Action Lewisham	1	OL 01	We welcome the fact that the spatial strategy is underpinned by a commitment to development that protects, enhances and connects green infrastructure as well as development that responds to the climate emergency (OL1h p.66).	Noted.	Local Plan amended with new policy wording in OL1 (Delivering an Open Lewisham) to widen scope, and emphasise that Council and its partners take a strategic approach to the climate emergency.

			We feel, however that there could be more ambitious language surrounding this in the strategy. Whilst there is a commitment that all new development should respond to the climate emergency through adaptation and mitigation, we believe that responding to the climate emergency should also be part of wider decision making, for example in OL1b *Directing new investment to the Borough's strategic Area for Regeneration, and other local areas for regeneration, and coordinating the delivery of this investment to help tackle deprivation and ensure equality of opportunity within the context of an effort to tackle the climate emergency and strategically use the opportunities that this may bring"*		
London Wildlife Trust	1	OL 01	**OL1 Delivering an Open Lewisham (spatial strategy)** • Clause f: Whilst we support the principle of this (as in paras 3.38-41) we are concerned by the statement; *'Proactively seeking to make the best use of land and space, and prioritising the redevelopment of brownfield land for new housing and workspace, along with optimising the development of strategic sites and other smaller sites across the Borough, including…'* Given that brownfield land is the foundation for many of Lewisham's SINCs, we would hope that the *'brownfield land'* is caveated with a *'of low or negligible ecological value'* (aligning with NPPF paras 117 and 118b), so that development doesn't inadvertently undermine the potential for securing a viable nature recovery network, which may include SINCs from new 'brownfield land'. This could be set out to give clarity in para 3.42 Para 3.42 See points made above.	Noted.	Local Plan policy OL1.F amended to refer to brownfield land of low or negligible ecological value, as suggested.
London Wildlife Trust	1	OL 01	Clause h: Strongly support	Support noted.	No change.
London Wildlife Trust	1	OL 01	We support the thrust of the objectives set out in paras 3.47-50. However, 3.49 appears to base its principles on the old canard that greenfield sites are always more important for biodiversity than brownfield sites. As the 'green' and 'brown' are merely crude indicators of past use, it would be better to reference their existing value and context, whatever a particular site's history. So the best sites are protected for nature's recovery, and those of least value might be preferred for development. We recognise that either can usually be enhanced for biodiversity.	Noted.	Local Plan policy OL1 supporting text amended to refer to support to redeveloping brownfield land of low or negligible ecological value, and signposting opportunity to enhance ecological value of brownfield sites.
NHS (HUDU)	1	OL 01	**OL1 Delivering an Open Lewisham** We broadly support this draft policy; however, we propose that clause g) is strengthened to support f) which refers to the delivery of community and transport infrastructure but not how it will be funded or delivered. We also suggest	Noted. Arrangements for the funding and delivery of infrastructure are set out in Part 4 of the draft Local Plan. The plan must be read as whole.	No change.

			that the broader term 'social and community' infrastructure wording is used. g) Requiring all new development to be delivered through the design-led approach, *and to contribute to necessary infrastructure*, and informed by an understanding of local area character (including the historic, cultural, natural and built environment), to enhance local distinctiveness, and to help secure liveable, walkable, healthy and safe communities. Clause h) refers to existing green infrastructure, however, to encourage walking and cycling, active lifestyles and environments that support good physical and mental health and wellbeing, many areas of the boroughs require 'greening'. Covid 19 has highlighted the importance of access to nature and urban greening in local streets and neighbourhoods and we ask the Council to undertake an audit prioritising the more deprived areas and requiring development in areas scoring lower on measures such as TfL's Healthy Streets initiative to improve this position.	The supporting text to the Part 2 policy CI1 on Community Infrastructure provides that community infrastructure is also referred to as social infrastructure. The Local Plan broadly supports and includes policies to increase urban greening, recognising the important role this plays not only for the environment but the health and wellbeing of the population. Further details are set out in Part 2 policies on Green Infrastructure. The Open Spaces Assessment includes an audit of open space across the borough. Drawing from this evidence, the Local Plan includes policies to address identified deficiencies in open space and play space provision.	
Telegraph Hill Society	1	OL 01	We remain strongly of the belief that policy **OL1** is wrong as regards the application of Opportunity Area if the phrase is meant to apply to those shown in **figure 3.1** which shows part of the Telegraph Hill Conservation Area in the Growth Area. We would refer back to our comment on **figure 3.1** in paragraphs 34 and 35. The Telegraph Hill Conservation Area is not an Opportunity Area as defined. If the policy is meant to mean that the area is included only because the Mayor of London has included it (wrongly) as such in the London Plan, then this should be made clear, together with a statement it will be treated as within the Opportunity Area only for the purposes of assessing the impact of a development on Heritage Assets.	The Opportunity Areas have been mapped in accordance with the London Plan. The Council has used GIS base layer mapping to ensure accuracy of the boundaries. The London Plan sets out strategic policies for Opportunity Areas which the Local Plan helps give effect to. They should not be restricted to the consideration of heritage assets, as suggested by the representation.	No change.
Telegraph Hill Society	1	OL 01	We are concerned about the statement in **OL1A.d** "*Facilitating new development along … other strategic corridors (such as the east-west New Cross Road/A2 corridor).* The policy needs to take into account the impact of this on the Telegraph Hill and Hatcham Conservation Areas and its potential conflict with **Strategic Objective F15**.	The presence of a Conservation Area should not preclude new development from coming forward, provided this preserves or enhances the significance of a heritage asset and its setting. The draft Local Plan Part 2 policies on Heritage address these considerations and will help to ensure heritage and historic environment is taken into account in planning decisions.	No change.
Telegraph Hill Society	1	OL 01	**Policy OL1.g** is important and welcome, but clarity is needed on what a "design-led approach" means. We wholly agree that any design needs to be "informed by an understanding of local area character (including the historic, cultural, natural and built environment), to enhance local distinctiveness, and to help secure liveable, walkable, healthy and safe communities that are inclusive to all". However,	Noted. Further details on the design-led approach are set out in the London Plan and Local Plan policy QD1. It is considered that the policies and supporting text provide sufficient information about the approach and how it should be used in the planning and development process. However it is acknowledged that further clarifications could be provided to ensure development responds positively to the local context.	Policy QD1 amended to make clear that design-led approach requires an understanding of a site and its local context.

			"informed" can be interpreted in many ways and, under some interpretations, may mean simply that information has been provided rather than acted upon. We would prefer this to say "led by an understanding…" or "take into account an understanding of…". TELEGRAPH HILL SOCIETY RESPONSE TO THE DRAFT LEWISHAM PLAN Telegraph Hill Society 2 April 2021 Page 8 of 58		
Telegraph Hill Society	1	OL 01	In order to be consistent with **Strategic Objectives F13 and F15** , the requirement to *"enhance local distinctiveness"* should read *"preserve or enhance local distinctiveness as appropriate".* Taken to extremes, local distinctiveness in some areas might be enhanced by complete rebuilding – this would obviously not be appropriate in Conservation Areas. To give further guidance on what design is appropriate in order meet these objectives the section should also state that new development should ensure that it harmonises with the existing character of Lewisham's communities and townscapes.	Noted.	Local Plan Policy OL1 amended to make clearer that development must use the design-led approach to respond positively to local distinctiveness (rather than enhance it).
Telegraph Hill Society	1	OL 01	We are unclear as to how the conflicts here are intended to be resolved. There is a trade-off between, for example, the use of vehicles (which for many make a community liveable and for elderly and disabled people may be essential for inclusivity) but which can also be regarded, particularly by the young and fit, as unhealthy.	The draft Local Plan seeks to give effect to the Mayor's Transport Strategy and the London Plan objective for 90 per cent of journeys in inner-London to be made by walking, cycling and public transport. The policies focus on improving the public realm and public transport access to significantly enhance accessibility for people of all ages and backgrounds. Where private car use or car parking is required, provision is made for those with specialist requirements (such as blue badge spaces).	No change.
Telegraph Hill Society	1	OL 01	**OL1.h** does not currently refer to protecting private green space (see paragraph 18) and must do so.	Noted. It is unclear what is meant by private green space as this can cover a wide range of green and open space typologies - it is by definition privately owned. The draft Local Plan sets out a framework for protecting and enhancing the Borough's network of green and open spaces, and this is reflected at a strategic level in Policy OL1. Further details are set out elsewhere in the plan, particularly the Part 2 policies on managing development.	No change.
The Hatcham Society	1	OL 01	Wider topics important to Hatcham Disabled People In the 870-page Local Plan document, disabled people are only mentioned 9 times throughout the entire document. The majority of these references relate to disabled parking spaces and the need for these in the borough. Similarly, the document for the North area - where Hatcham sits - mentions disabled people only once in the context of parking. Lewisham council need to put the needs of disabled people at the centre of the Local Plan, and consider how pavements, new district centre designs and new housing developments are inclusive spaces for	Noted. The Local Plan aims to help Lewisham become a more accessible place. It broadly seeks to address the needs of people of all backgrounds, age groups and abilities. The Part 2 policies on High Quality Design include a policy on Inclusive and Safe Design which directly responds to the needs of disabled people as well as the wider community. Elsewhere there are specific policies dealing with housing design standards and parking standards which help to respond to the needs of this group. It is considered that this is a proportionate approach recognising the diversity and wide range of groups within Lewisham.	No change.

			everyone. Improving the lives of disabled people in Lewisham must be a core strategic vision. Lewisham is currently not an accessible environment. For example, the residents in Hatcham have requested for years for a drop curb to be installed in Harts Lane to open up the road to wheelchair access. Harts Lane is an important road for accessing Millwall stadium and other parts of North Lewisham but provides poor access for wheelchair users. There will undoubtedly be similar problem spots throughout the borough which should be highlighted, assessed and rectified through the council's 40 year vision for the area in the Plan. The Hatcham Society has requested funds from the Community Infrastructure Levy pot to improve access to Hatcham for disabled people but have not yet received word on whether we have been successful in this bid. We would like to see Lewisham become an accessible borough for all disabled people. We suggest Lewisham council include more of the borough's disabled people in the shaping of their Plan.		
Transport for London	1	OL 01	In general, we appreciate the emphasis on walkable, liveable, and connected neighbourhoods, as well as the lowering of vehicular speeds and dominance on major corridors. This will create a safer public realm and reduce severance. We also support car-free and car-lite developments in Opportunity Areas and town centres, as this enables effective use of land. However, we also recommend including areas around stations.	Support noted. The draft Local Plan provides that car-free and car-lite development will be supported at highly accessible locations – this includes stations. However it is acknowledged amendments can be made to the policy and supporting text to strengthen alignment with the London Plan.	Local Plan parking policies amended to ensure conformity with the London Plan.
	1	OL 1	Thank you for the opportunity to respond to the consultation on Lewisham's new Local Plan. I am a Lewisham resident and am responding on an individual basis rather than on behalf of any organisation. I support much of the draft Local Plan, including its ambitions to build more homes (including affordable housing) and to regenerate areas like Catford and Bell Green. My comments are restricted to the areas of spatial strategy, housing and transport. **Spatial strategy (policy OL1)** Given London's acute housing problems I am strongly in favour of building more homes and of making the best use of scarce land by building to high densities. Building at high densities in and around town centres and public transport nodes will also reduce the demand for motorised transport and provide more demand for shops, services and public transport that are increasingly vulnerable in a post-pandemic context.	Support noted. It is considered that the draft Local Plan provides support for the sensitive intensification of established residential areas, including Conservation Areas, where development responds positively to local character. It is agreed that this could be made clearer in Policy OL1 as the strategic policy. The draft Local Plan also recognises that the character of some areas will evolve or change over time in order to facilitate growth and development – for example, the spatial strategy identifies Growth and Regeneration Areas and growth corridors. However to ensure conformity with the London Plan, Policy QD1 will be amended.	Local Plan Policy OL1 amended to make clearer and emphasise support for the sensitive intensification of established residential neighbourhoods and commercial areas. Local Plan Policy QD1 amended to recognise that the character of areas may evolve or transform over time, consistent with the spatial strategy.

			However, the local plan's "character-led" approach of encouraging development in certain areas (mainly deprived town centre areas) while restricting it (through the "reinforcement" of existing character) in existing residential neighbourhoods is concerning. Those neighbourhoods whose character is to be reinforced are perfect for creating new family-sized homes that would also, unlike the existing Victorian and Edwardian stock, be energy-efficient and accessible to people with mobility problems. A visual inspection of the maps in the character study indicates that these neighbourhoods are disproportionately white and affluent, so "protecting" them from development in the name of "character" just accentuates existing inequalities of wealth and opportunity while raising prices and rents (particularly affecting low-income and ethnic minority communities). Policy OL1 says that the Council will direct new development to regeneration areas, town centres and the A21 corridor, while part F mentions the sensitive intensification of smaller sites across the borough. This sounds positive, but the intensification of small sites will be impeded by policy QD1 which says developments should 'reinforce and enhance' character, and address 'The prevailing or emerging form of development' and the proportions of buildings 'in the immediate vicinity of the site and the surrounding area'. This is a fundamentally conservative approach that locks in existing structures of exclusion. By contrast, the new London Plan (policy H2B) says that boroughs should "recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites". Policy OL1 should therefore be strengthened to more strongly support the intensification of small sites, particularly where this diversifies the housing stock and allows more people to access high-demand areas.		
The St John's Society	1	Para 1.44	'Neighbourhood Planning' - How does the council propose to better forge connections with local neighbourhood and amenity groups to ensure their voices are heard? There should be formal communication and consultation between the borough and its citizens. How will the borough 'work positively' with Neighbourhood groups?	The Council's adopted Statement of Community Involvement sets out how the public will be consulted on the preparation of planning documents and planning applications. The Council has a statutory duty to support designated neighbourhood Forums on the preparation of neighbourhood plans, which the Local Plan states. Further details on the Council's role in this regard and support available are provided on the Council's planning webpages.	No change.

Home Builders Federation	1	Para 2.13	**Part 1: Lewisham Today and Planning Ahead** **Planning ahead for an Open Lewisham** The Council observes on page 43: *"The rapid population growth experienced in Lewisham in recent years is expected to continue, with projections estimating a 19% population growth between 2017 and 2040".* We agree that the Council is wise to be cautious about the future population growth of Lewisham. Many commentators, including the Greater London Authority (GLA), have stated that it is hard to know whether the pandemic will make a structural or temporal change to the population of London. Consequently, it would be unwise to set an alternative figure for expected housing growth in Lewisham over the plan period from that set by the recently adopted London Plan (adopted February 2021). Furthermore, as London is treated as a single housing market area, where housing needs generated in local authority can be provided for by another, it would cause difficulties for planning for London's housing needs if one local authority decided unilaterally to set a different target, especially one that was lower than the London Plan minimum figure of 52,000 dwellings per annum (dpa). The overall need for London – or the objectively assessed housing need to use language that is perhaps falling out of favour – is 66,000dpa. Corrections in the rate of household formation across London as a whole, which may or may not reflect a lower rate of household formation in the wake of the pandemic, will be made by the Mayor, through a review of the London Plan. Much has been made of the 700,000 people who have been said to have left London since the pandemic. However, it is unclear how this translates into households and where in London these people were living prior to leaving. It is hard to assess how these recent changes will feed-through into projections of household formation in Lewisham. Even so, plan-makers will need to be mindful of the fact that housing need may not necessarily fall overall in England, even if the geographic patterns of demand may change. For example, although currently there are indications that relatively more affluent homeowners are leaving London to live in locations elsewhere in England,	Noted. The London Plan (2021) housing target for Lewisham will be reflected in the Local Plan as the strategic housing requirement.	Local Plan amended to remove references to the standard methodology for Local Housing Need, and make clear that the Local Plan will ensure delivery against the London Plan housing target for Lewisham.

			this will require the GLA to engage with the local authorities of the Wider South East to reflect these shifting trends in migration when making new plans. In brief, is hard for Lewisham to deal with these broader trends through a local plan. This will be addressed more effectively by the Government through changes to the Standard Method for assessing housing need, and by the GLA through establishing the likely housing need overall for all London.		
The St John's Society	1	Para 2.13	Projections for growth need to be constantly assessed and reassessed. Much is currently in flux and will surely change by 2040.	Noted. The Council is required to maintain an up-to-date Local Plan and review its adopted plan at least every 5-years. Growth projections and London Plan housing targets will be considered through the plan review process.	No change.
Deptford Society	1	Section 01	The plan is intended to cover a period of 20 years. A lot can change in this time. How regularly will it be revisited or updated to address changes in policy, funding availability and priorities? What flexibility does the plan offer in the event of new demographic shifts? (e.g. 700,000 immigrants have left the country) Do we really need the numbers of new dwellings projected? How can the plan adapt to changing circumstances? What long-term impact is Covid expected to have on residential and workspace demands and how will the local plan respond to this? Connections and interrelationships between categories are not explained or explored. E.g. land development viability calculations for housing are impacted by the very high cost of construction, which in turn is driven by a shortage of skills and training. There is no clear indication of how the new Local Plan proposals differ from, or exceed (or reduce) provisions or commitments currently in place.	The Council is required to maintain an up-to-date Local Plan and review its adopted plan at least every 5-years. Any future review and update to the Local Plan will be considered taking into account findings of the Council's Authority Monitoring Report and changes in higher level policy and legislation. Since the Regulation 18 stage document was published, the Council has carried out additional studies to consider the impact of Covid-19, including a Town Centres and Retail Study and Strategic Housing Market Update. Findings have informed the Regulation 19 plan. A Viability Assessment of the Regulation 18 Local Plan was undertaken. This will be reviewed and updated at the Regulation 19 stage to take account of changes made to the plan, and the latest baseline information on development viability.	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections
Deptford Society	1	Section 01	Page 30 Neighbourhood planning. The role of amenity societies and where they sit in the context of neighbourhood forums and neighbourhood planning needs to be clarified. Page 37 North Lewisham is home to one of London's first Creative Enterprise Zones. What does this mean in the context of planning? Further explanation or a definition is needed.	The Council values the role that amenity societies play locally and recognises their important contributions to planning and other matters. The role of community groups such as societies in the planning and development process is set out in the adopted Statement of Community Involvement, which is a procedural document which sites alongside the plan. The introductory section of the Local Plan discusses neighbourhood forums as they are formally designated for plan making functions, and neighbourhood plans form part of the statutory development plan. A definition of CEZ is included in the glossary. Creative Enterprise Zones are an initiative from the London Mayor to designate areas where artists and creative businesses can find permanent affordable space to work; are supported to start-up and grow; and where local people are helped to learn creative sector skills and access pathways to employment. Lewisham has	Local Plan amended to signpost amenity societies in the introductory section.

				been designated a CEZ. Part 3 of the Local Plan, Lewisham's North Area includes policies to support this.	
Lee Forum	1	Section 01	**PART 1: Strategic and nonstrategic policies** Engagement is restricted to a focus on strategic partners and little is said about engagement at the community level though amenity groups. For Neighbourhood Forums: Clarity on what 'will work positively' means in practice is needed. Para 1.44 1.45 is it only to get Neighbourhood Plans to adoption? What engagement will happen after adoption? The Lewisham local plan suggests forums can support the local plan's implementation but we consider the focus should be that the local plan ensures that Neighbourhood plans are applied in planning decisions. We would like clarity on what the council sees as a working relationship between forums and amenity groups and the council	Part 1 of the draft Local Plan states that the Council will work with local communities and community groups to improve transparency and openness in decision-making, and to foster greater public understanding of and involvement in the planning process. The introductory section of the Local Plan discusses neighbourhood forums as they are formally designated for plan making functions, and neighbourhood plans form part of the statutory development plan. The Local Plan also sets out the relationship between strategic and non-strategic policies, as required by the National Planning Policy Framework. The Council has a statutory duty to support neighbourhood forums. Further details on the role of the local authority in neighbourhood planning are set out in the National Planning Practice Guidance. Information is also available on the Council's planning webpage. Neighbourhood plans which are adopted and made form part of the statutory development plan and will be considered in planning decisions.	No change.
Lee Forum	1	Section 01 Evidence base	Projections for retail and housing growth should be kept under review given the uncertainty of what post covid retail will look like given the shift to both online shopping and changes to office / home based work patterns.	Noted. The Council is required to maintain an up-to-date Local Plan and review its adopted plan at least every 5-years. The London Plan sets a strategic housing target for Lewisham, which the Local Plan must address. Following the Regulation 18 consultation, a new retail and town centres study has been undertaken. This provides updated town centre health checks and also considers new data, including on the impacts of Covid-19, online shopping trends and new Permitted Development rights. The study and its recommendations have been used to inform the local plan.	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections
London Wildlife Trust	1	Section 01	**1. About Lewisham's Local Plan** *Planning framework* • • Para 1.11: We note the 'extinction crisis' is not referenced, despite State of Nature (2019), the 25-year Environment Plan, and the objectives of the Government's Environment Bill.	Noted. The planning framework documents cited are intended to refer principally to the government's national planning policies and legislation around plan production. Relevant key plans and strategies for different topic areas are signposted elsewhere in the Local Plan.	Local Plan Policy GR3 (Biodiversity and Access to nature) supporting text amended to include reference to the Environment Bill and State of Nature Reports (2019).
Sydenham Society	1	Section 01	**Strategic and non-strategic policies** **Neighbourhood planning** P30 *The Council has a statutory duty to support designated neighbourhood forums in the preparation of neighbourhood plans. We will work positively with forums to ensure their plans appropriately support the Council's strategic planning priorities, so that they have the best chance of succeeding at the examination stage and can be formally adopted. This Local Plan is presented in a new format that responds to the strong interest in neighbourhood planning in Lewisham. For example, Part*	The Council values the role that amenity societies play locally and recognises their important contributions to planning and other matters. The role of community groups such as societies in the planning and development process is set out in the adopted Statement of Community Involvement, which is a procedural document which sites alongside the plan. The introductory section of the Local Plan discusses neighbourhood forums as they are formally designated for plan making functions, and neighbourhood plans form part of the statutory development plan.	Local Plan amended to signpost amenity societies in the introductory section.

			Three sets key objectives and priorities for the Borough's character areas. It provides a useful reference point from which neighbourhood forums, and other community groups, can work to support the Local Plan's implementation. The Sydenham Society supports the ambition to create neighbourhood forums in the Borough but maintains that amenity groups and civic societies should not be downgraded in a hierarchy of community groups. The Forum of Conservation and Amenity Societies (FOCAS) meets regularly and should be accorded equal status in consultation and plan-making. The Society welcomes the accessible format of the new Local Plan.		
Telegraph Hill Society	1	Section 01 Strategic objectives	**§ 3.1** The Vision for Lewisham mentions "vibrancy of our high streets, local businesses, arts and cultural establishments, our evening and night-time economy and our world-renowned institutions". There is no reference to the heritage of the Borough nor reference to protecting this within the "Vision for Lewisham". There should be such specific reference in order to support **Strategic Objective F**.	Noted. Whilst the Vision does not specifically refer to heritage, this is captured in the first part of the Vision which states that "Lewisham will continue to be a welcoming place where the culture and diversity of our people, and the unique qualities of local neighbourhoods, is recognised and protected". Priorities and policies for conserving and enhancing heritage is clearly set out in the plan's strategic objectives and Part 2 and 3 policies.	No change.
Telegraph Hill Society	1	Section 01 Strategic objectives	As noted above, **§ 3.1** also fails to mention increasing the Borough's employment base. There should be such reference in order to support **Strategic Objective C**.	Noted. Growing and strengthening the local employment base is considered to be captured by the draft Local Plan Vision in the 3rd paragraph.	No change.
London Wildlife Trust	1	Section 02	**2. Lewisham Today & Planning Ahead** *Lewisham in context* • • Para 2.9: We suggest some brief reference here to the Great North Wood on the western ridge, the River Thames frontage and tributaries (Quaggy, Ravensbourne, Pool) here.	Noted. This introductory part of the draft Local Plan provides a high-level overview. The importance of the Great North Wood and River Thames / tributaries is captured in Part 2 and Part 3 of the plan, where there are detailed policies covering these important features.	No change.
London Wildlife Trust	1	Section 02	*Planning ahead for an Open Lewisham* We note that the natural environment is briefly referenced in the Planning ahead paras (notably 2.23, 2.26), but nothing explicit, for example the context of the 25-year Environment Plan, the Environment Bill (with its mandatory requirement for Biodiversity Net Gain), and regionally the London Environment Strategy's habitat restoration/enhancement & creation objectives, London Urban Forest Plan5, and sub-regional catchment plans.	Noted.	Local Plan Policy GR3 (Biodiversity and Access to nature) supporting text amended to include reference to the noted key plans and legislation, including Environment Bill and State of Nature Reports 2019.
NHS (HUDU)	1	Section 02 Para 2.15-2.16	Paragraphs 2.15 sets out the 2021 London Plan ten year target of 16,670 homes for the borough. However, the draft plan refers to seeking to exceed this and in paragraph 2.16 to provide for the estimated demand for approximately 5,300 net additional square metres of retail floorspace up to 2030 and 21,800 net additional square metres of employment floorspace up to 2038.	The London Plan sets a strategic housing target for Lewisham, which the Local Plan must address. As the draft Local Plan Regulation 18 document was being prepared, the London Plan (2021) had not yet been adopted, therefore consideration was given to the Local Housing Need figure in line with national planning policy. Following the Regulation 18 consultation the Council has undertaken additional work on evidence. This includes a new retail and town centres study. This provides updated town centre health checks and also considers	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections.

			We note that the evidence base pre-dates Covid-19 and therefore does not reflect or take into account the substantial shift in working and shopping patterns. With most businesses, where employees were instructed to work from home, now indicating long term reduced office requirements through implementing hybrid office /home working and online shopping increasing to around 35% this evidence should be revisited. This is important given the additional pressure on land and buildings created by the scale of additional floorspace required which in turn increasing the density of housing. Higher density housing, for example the many high rise in Lewisham town centre, provides very limited private outside space, often an increase in single aspect units, and too often increases adverse impacts on physical and mental health. Therefore, identifying and understanding additional opportunities for housing through the reuse/redevelopment of commercial floorspace may offer a wider range of housing opportunities and increase the contribution to individual and community health and wellbeing.	new data, including on the impacts of Covid-19, online shopping trends and new Permitted Development rights. The study and its recommendations have been used to inform the local plan.	
Sydenham Society	1	Section 02	P19 *Secure the delivery of the Bakerloo Line extension and other transport infrastructure –investment in transport infrastructure is needed to help tackle deprivation and improve health outcomes locally, as well as to accommodate and promote Good Growth. The draft London Plan now confirms a commitment to upgrade and extend the Bakerloo line (London Underground) to Lewisham. The new Local Plan is needed to help secure the delivery of the tube line extension and set a framework to maximise the local benefits it can bring.* The Sydenham Society supports the ambition of bringing the Bakerloo Line to Lewisham and eventually extending it to Hayes via Lower Sydenham. However, given that Transport for London has announced that it is putting the project on hold (for both financial and political reasons) we question how deliverable the contingent level of growth is – especially given that the Local Plan is, in effect, a document which aims to attract developers to sites adjacent to the new line	Support noted. The Regulation 18 Local Plan document set out several spatial strategy options, recognising that some or all phases of the BLE may not be delivered in the plan period (including for reasons of funding). The preferred approach for the spatial strategy is therefore not dependent on the BLE. However the spatial strategy and the Local Plan policies aim to facilitate the delivery of the BLE, and provide flexibility to respond to it. This includes provision for an uplift in site development capacities enabled by the BLE through higher public transport access levels, particularly in the Bell Green and Lower Sydenham area.	No change.
Transport for London	1	Section 02 Para 2.24	2.24 - We welcome the recognition in this paragraph of lower PTAL areas in the borough and how the local plan is encouraging a coordinated approach to improving public transport to create a connected network of town centres and compact neighbourhoods. To reduce car use, interventions such as low traffic neighbourhoods or consolidation of destination car parking will be needed as complementary measures. As mentioned above, a more	Support noted. The Local Plan will help give effect to the London Plan and the Mayor's Transport Strategy. The Local Plan sets out measures to help achieve the Mayor's objective for 90 per cent of journeys in inner-London to be made my walking, cycling and public transport. The Local Plan provides the overall land-use strategy for this. The Council has and will continue to explore opportunities outside of the planning and development process to support modal shift, such as low traffic neighbourhoods.	No change.

			comprehensive strategy with details is helpful to clarify how this vision could be achieved.		
DNA	1	Section 02	**09 We feel the emerging Local Plan overall and fundamentally is lacking up-to date areas specific evidence, employed to inform a focused policy response and spatial infrastructure investment plan especially in light of the poverty in the borough experienced by so many.** Our work on the Draft Neighbourhood Plan should therefore help to inform this policy and strategy development for the whole of the 'North Sub Area'. Lewisham ranks as the 48th most deprived of all 326 local authorities, placing it in the 20% most deprived areas in England and has the highest proportion of children and young people (29.6%) and older people (25.7%) in economic deprivation in England (Indices of Multiple Deprivation 2015). In relative terms Lewisham has become less deprived since 2015. It is now ranked 63rd most deprived LA, compared to 48th in 2015, 31st in 2010 and 39th for 2007. However, relative to London, Lewisham has become more deprived moving from 10th most deprived to 7th. 50% of Lewisham's most deprived LSOAs in 2019 were the most deprived in 2015, compared to 88% for the whole of England Crime has seen the biggest improvement in ranking 'Barriers to Housing & Services' has seen the worst decline in ranking. But in some areas, it is much higher. In the neighbourhood plan area, in Evelyn ward and in parts of New Cross, 49% of children live in poverty, after the cost of housing is taken into consideration (End Child Poverty Report). On page 37 of the emerging Local Plan it states "Physical activity is a key determinant of public health and wellbeing, with obesity linked to many serious risks in children and adults. Whilst over half of Lewisham adults are physically active, adult and childhood obesity is an issue. Children living in the Borough's most deprived areas twice as likely to be obese or overweight as other children." <u>DNA therefore asks the Council to include as a matter of urgency a detailed and up-to date set of policies in support of sustainable development which requires in our view a coherent strategy and spatial detailed infrastructure delivery plan aimed at reducing poverty, delivering a step-change in quality of life within the transition to a post carbon urban economy.</u> This to attract and guide public and private investment into the direction where it is most needed and reducing harm and further inequalities.	Disagree. The draft Local Plan has been informed by an extensive evidence base across a variety of policy topic areas. The plan has also been prepared taking into account the principles of sustainable development set out in national planning policy and the Good Growth principles of the London Plan. Whilst we recognise the role that neighbourhood planning can have to provide non-strategic policies for a local area. It is the role of the Local Plan to provide strategic policies that neighbourhood plans must conform with, in order to meet the Basic Conditions.	No change.
	1	Section 03 Strategic objectives	I would also like to make the following additional comments on the Strategic Objectives: Retrofit of homes Buildings use 40% of UK energy, and 80% of buildings that will exist in 2050 have already been built, so improving the energy efficiency of the existing stock is key to meeting climate change targets and slowing down the	The Regulation 18 Local Plan document includes policies on sustainable retrofitting of existing building stock. However it is accepted that the plan can provide more emphasis and support for this. The Council is currently preparing a climate change action plan which will look in more detail at the options for retrofitting the borough's existing housing stock.	Local Plan amended with additional policy to emphasise the importance of sustainable retrofitting of existing building stock.

			deterioration of our Planet. The current Local Plan does little to address this. As a bare minimum, the Council could distribute regular guidance to residents as part of Lewisham Life (e.g. on draft-proofing, insulation options, access to grants). To provide support to the retrofit sector, the Council could set up a subsidised free advice centre about home improvements, perhaps drawing on the expertise of local initiatives such as Retrofitworks and RAFT / Harry Paticas. This could also address the strategic objective of achieving a THRIVING ECONOMY THAT TACKLES INEQUALITIES. The Council could lead by example by retrofitting its own building stock to EnerPHit standard, which is a robust, evidence-based, building physics-led approach to designing the best combination of measures to achieving sustainable building improvements. Although I agree that our LOCAL IDENTITY SHOULD BE CELEBRATED, I would urge the Council to lift any perceived planning barriers to building improvements so that one of the most efficient home retrofit measures which is external wall insulation could be rolled out more widely where appropriate. Where the facade is of great significance and major internal alterations are proposed, the applicants should be obliged to retrofit vapour-open wall insulation internally in a depth that can be quantified to be condensation-risk-free by an appropriate designer. New homes To avoid ending up with a retrofit problem in 2040, new-build homes should be constructed to more onerous environmental standards rather than the bare minimum prescribed by the Part L of the Approved Documents. Can Lewisham be bold enough to require that all new development is done to the Passivhaus Standard? The UK Passivhaus Trust is an excellent source of information and also keeps a record of Passivhaus homes - it is regrettable that a borough that is home to many pioneering housing developments of the past is really lagging behind in championing truly sustainable construction.		
	1	Section 03 Strategic objectives	I would also like to make the following additional comments on the Strategic Objectives: A GREENER BOROUGH & HEALTHY AND SAFE COMMUNITIES Abolish pesticides	The use of pesticides is outside the scope of the Local Plan. The draft Local Plan Part 2 on Sustainable Design and Infrastructure includes policies which require new developments to make provision for well-designed and easily accessible facilities for recycling, compost and waste, including where new public realm is provided.	No change.

			Urban centres have become a haven for wildlife, and this needs to be encouraged. Insects have suffered a tremendous decline over the last decade, so the use of insecticides and pesticides by the council e.g. for path management is unacceptable. Please consider alternative practices and engrain these in the policies. Improve access to the recycling facilities The Landmann centre is not accessible enough for people who don't have cars. Hiring a small van (most often the cheapest hire car available) and taking rubbish to the centre could be an option for some residents if not for a ban on vans - seems like an exception is needed to facilitate the process and potentially alleviate fly tipping of bulky items on the streets. If the Council is serious about air quality and sustainability issues, then such a car-centric approach to accessing the only recycling centre needs to change. Perhaps smaller sites need to be introduced across the borough to assist those with no access to a car. There should be recycling bins in the streets rather just one container. If the waste gets separated out in the recycling centre, people should be informed, otherwise it might discourage them from recycling at home. There is really poor provision of electrical items recycling in the borough. On a recent quest to recycle some old appliances, I visited one of the four sites that are still active, only to find the bins overflowing. Wastewater treatment Anybody who's taken a walk along rivers Pool or Ravensbourne after a heavy rain would have noticed heavy pollution from raw sewage, which is unacceptable, so while I applaud the objective of "protecting the amenity of residents and visitors, particularly from pollution", there is not enough emphasis on ensuring the improvements are for the benefit of wildlife as well. The Thames has some hope in the form of the Tideway project, but smaller rivers are left to suffer. The emphasis on increasing connectivity of green spaces is commendable, however I would like to see a commitment to: •Protecting waterways from sewage to both enhance natural habitats and improve people's enjoyment of the walkways •Control road run off around industrial sites (e.g. the various workshops along river Pool)	The draft Local Plan includes policies on managing wastewater and enhancing Lewisham's waterways, which address concerns raised in this representation. The Council's Reuse and Recycling Plan (2019) and new Waste Management Strategy 2021-2031 set out priorities for recycling throughout the borough.	

			•Ensure planned densification does not exacerbate the sewage pollution problem, and appropriate CIL is charged to fund improvements to infrastructure to reduce pollution events. In terms of river pollution events, given that some densification has already occurred, it does not seem that the delivery of necessary infrastructure had happened, so the objective of SECURING THE TIMELY DELIVERY OF INFRASTRUCTURE is commendable albeit lacking an emphasis on wastewater treatment.		
	1	Section 03 Strategic objectives	I would also like to make the following additional comments on the Strategic Objectives: SECURING THE TIMELY DELIVERY OF INFRASTRUCTURE Network of public toilets Humans need toilets and if people are to ditch cars and use more sustainable modes of travel (walking and cycling), then the Council needs to provide access to decent loo stops. The pandemic has highlighted that businesses cannot be relied upon to provide public toilets. Cycling routes LTN have been a great boon for cyclists, walkers and residents, so these should be encouraged. They are not expensive to roll out and have been proven effective across London and should continue to be implemented. Direct and interconnected routes are very important. Separating cycle ways from roads is very welcome, but much more work needs to be done to make junctions safer for cyclists, for example the notorious roundabout in Crofton Park where Brockley grove peels away from Brockley Road. Pedestrian safety at busy junctions It is unacceptable that in 2021 even able-bodied people need to run the gauntlet across some of the busiest junctions in the borough, while disabled and visually impaired people are discriminated against due to the lack of pedestrian signals on busy intersections. Amongst the examples are: •Catford Road / Thomas Lane crossing is very busy and almost impossible to cross. Temporary lights installed earlier this year highlighted how much of a barrier the lack of a signalled crossing is. Southern circular - Brownhill Road / Verdant Lane •Blackheath Hill (A2) seems like another hard boundary where pedestrian crossings are few and far between,	The draft Local Plan Part 2 policy QD3 Public Realm seek to ensure more and suitable provision for public toilets. The draft Local Plan sets out measures to help achieve the Mayor's objective for 90 per cent of journeys in inner-London to be made my walking, cycling and public transport. This includes policies which support the delivery of a safe and well connected network of cycleways, as set out in the Lewisham Links. Part 3 of the draft Local Plan sets out specific requirements on site allocations. Elsewhere, improvements to specific junctions and cycleways, may be addressed through Lewisham's Cycle Strategy or the Council's Local Implementation Plan.	No change.

			prompting people to cross dangerously following their desire lines		
	1	Section 03 Strategic objectives	I would also like to make the following additional comments on the Strategic Objectives: ENSURING HIGH QUALITY EDUCATION, HEALTH AND SOCIAL CARE Ventilation in public buildings I fully support the Council's objective to delivering high quality services, but to make public buildings as safe as possible, adequate ventilation should be provided. Retrofitting mechanical ventilation with heat recovery (MVHR) is an investment that not only tackles safety and comfort, but also helps address the climate emergency. I would like to see a commitment to helping schools and medical facilities install these as a priority.	The draft Local Plan Part 2 policies on amenity address the need for new development to provide for adequate ventilation. The draft Local Plan Part 2 policies on Sustainable design and infrastructure includes policies on sustainable retrofitting of existing building stock. However it is accepted that the plan can provide more emphasis and support for this.	Local Plan amended with additional policy to emphasise the importance of sustainable retrofitting of existing building stock.
Climate Action Lewisham	1	Section 03 Strategic objectives	Climate Action Lewisham (CAL) welcomes the emphasis on the climate emergency and the way that this features in the strategic objectives of the plan (E: Responding to the climate emergency). We strongly believe that this must remain a key part of the plan. With regard to the strategic objective, we believe that a key opportunity has been missed in terms of green jobs. In strategic objective C: *A thriving local economy that tackles inequalities,* objective 5 we would like to see a commitment to pursuing green jobs. This would strongly align with the priorities set out in this strategic objective of diversifying the local economy and could take advantage of national government policies and funding for green jobs (for example through the 80 million Green Recovery Challenge Fund). We address this further under our responses to Economy and Culture. In addition, we believe that there are many places in part 2 of the plan where policies that enable the council to respond to the climate emergency must be strengthened (both in terms of language and content). We have outlined these below in our responses to part 2 of the plan below.	Supported noted.	Local Plan amended with an additional objective to promote green industry and transition to circular economy.
Culverley Green Residents Association	1	Section 03 OL 01	The draft plan and the growth in residential units which it proposes seem to be predicated on the additional capacity afforded by the Bakerloo line extension to New Cross and Lewisham. The damaging effects of Covid on TfL finances make this proposal highly unlikely and even if it does go ahead it is not going to be in the life of this plan. Just see how long Crossrail has taken or the Jubilee line. However, the plan makes no attempt to analyse how all these additional residential units can be serviced and	The Regulation 18 Local Plan document set out several spatial strategy options, recognising that some or all phases of the BLE may not be delivered in the plan period (including for reasons of funding). The preferred approach for the spatial strategy is therefore not dependent on the BLE. However the spatial strategy and the Local Plan policies aim to facilitate the delivery of the BLE, and provide flexibility to respond to it. This includes provision for an uplift in site development capacities enabled by the BLE through higher public transport access levels, particularly in the Bell Green and Lower Sydenham area.	No change.

			accommodated without a drastic level of improvement in rail and bus transport. The plan shouldn't even mention the extension to Catford as that's definitely not going to happen within the lifetime of the plan and the extra housing outlined in the plan for Catford needs to assess the additional traffic and transport it would generate and require and how it will be serviced. Otherwise the plan is not assessing how these extra units will impact on the existing residents and bus and train users.	An Integrated Impact Assessment has been prepared alongside the Local Plan, and includes an assessment of the likely social, economic and environmental impacts arising from it. A separate Transport Assessment of the Local Plan has also been prepared. The Local Plan sets out requirements for new developments proposals to assess and mitigate any impacts on the transport network.	
Deptford Society	1	Section 03 Vision	Good growth too easily gets distilled down to just delivering 'more housing'. There should be a more inventive vision of how we want to live in Lewisham that envisages a richer and more diverse and intense mix of uses: greater employment creation, not just in business and industrial zones. The possibility of e.g. small to medium scale making and other kinds of production (cultivation, brewing, small-scale repair work, de-centralised office hubs etc. etc.) across the more suburban territories within the borough. A vision of more diverse, activated, connected communities, not just a territory of dormitory settlements with a business and industrial zone in the north. The more positive local aspects of the lockdown experience should help to drive this.	The definition of Good Growth is set out in the London Plan. This definition has been signposted in the Local Plan for the avoidance of doubt – this makes clear that Good Growth limited to increasing housing supply, but encapsulates wider social, economic and environmental considerations.	No change.
Environment Agency	1	Section 03 Strategic objectives	**Strategic objectives - Responding to the climate emergency** Objective 12 currently mentions a number of ways to guard against the risk of flooding as part of a response to the climate emergency. We would like the wording to be strengthened and to include a reference to the Thame Estuary 2100 (TE2100) plan. The current objective mentions enhancing defences but we would like this to highlight the requirement for Thames Tidal Defences to be raised as per TE2100 and maintained to a standard meeting the design life of any proposed development.	Noted. The plan will be amended in line with the recommendations.	Local Plan strategic objectives amended to refer the TE2100 plan. Local Plan amended to include a new requirement for development to raise the Thames Tidal Defences, where appropriate, in line with the TE2100 plan.
Greater London Authority	1	Section 03 OL 01	**Opportunity Areas** The draft Plan should explicitly include indicative growth figures for the New Cross / Lewisham / Catford Opportunity Area based on London Plan Table 2.1. There is also little detail on the ways the draft Plan would facilitate growth and development within the Deptford Creek / Greenwich Riverside Opportunity Area and no indication of a mapped boundary. As it is the role of the London Plan to designate new Opportunity Areas, the consideration of a longer-term aspiration to designate a new Opportunity Area at Bell Green and Lower Sydenham would require close collaboration with the GLA to explore its potential designation in future.	It is acknowledged that it is the role of the London Plan to designate Opportunity Areas. The Local Plan therefore indicates that there may be scope for a future Opportunity Area in the south of the borough, given development opportunities and planned infrastructure investment (e.g. BLE) however recognising that this will require close collaboration with the Greater London Authority and be subject to a future review of the London Plan. The indicative capacities for the Opportunity Areas are set out in the London Plan, which forms part of Lewisham's development plan. Part 3 of the Local Plan includes further details on the indicative capacities of site allocations included within the Borough sub-areas.	Local Plan amended to provide further detail around the planning objectives for Opportunity Areas in the spatial strategy.

Greater London Authority	1	Section 03 OL 01	**Transport/Bakerloo Line Extension (BLE)** Close cooperation with GLA/TfL will continue to be required to evaluate and support development opportunities and phasing related to Bakerloo Line Extension (BLE) proposals. As set out in detail in the consultation response by TfL, there is concern about the lack of a clear and consistent differentiation between the upfront Preferred Approach in the draft Plan, which does 'align' with a scenario without the BLE being delivered, and scenarios supporting the BLE in other parts of the draft Plan and its evidence. Further details about the draft Plan's 'sufficient flexibility to respond quickly to the phased delivery of the BLE' (paragraph 3.20) would be useful. TfL also asks for more prominent references to the safeguarding of land for the BLE. The Mayor strongly supports the draft Plan's restraint-based approach to car parking and alignment with the London Plan standards (London Plan Policy T6) in draft Plan Policy TR4(F). However, there are some elements that could be strengthened, as set out in TfL's comments attached. The Mayor also supports TfL's detailed comments to further improve measures to facilitate a shift towards sustainable transport modes.	The Regulation 18 Local Plan document set out several spatial strategy options, recognising that some or all phases of the BLE may not be delivered in the plan period (including for reasons of funding). The preferred approach for the spatial strategy is therefore not dependent on the BLE. However the spatial strategy and the Local Plan policies aim to facilitate the delivery of the BLE, and provide flexibility to respond to it. This includes provision for an uplift in site development capacities enabled by the BLE through higher public transport access levels, particularly in the Bell Green and Lower Sydenham area – this is signposted in the plan but it is acknowledged this could be made clearer. The Council is committed to supporting and enabling the delivery of the BLE through the Local Plan, but a pragmatic approach is necessary to ensure the spatial strategy is sound. General support for transport policies noted. The draft Local Plan will be reviewed and updated to ensure general conformity with the London Plan.	Local Plan amended to clarify Council's commitment to enabling the delivery of the BLE, whilst ensuring the plan is deliverable in the absence of the BLE.
Historic England	1	Section 03 Strategic objectives	We are encouraged to note prominent references to development respecting existing character (para 1.2) and the historic environment (F13 Strategic Objective).	Support noted.	No change.
Lee Manor Society	1	Section 03 OL 01	**Bakerloo line** (p60 para 8.14). The proposed Bakerloo line extension is described as enhancing 'transport accessibility in many parts of the borough.' Seen from Lee (Lewisham East), this appears optimistic. It is an Underground line that will largely follow existing well-provided-for transport corridors through the centre of Lewisham. Lee, meanwhile, still lacks convenient bus connections with central Greenwich and with Peninsular Park.	Noted. Transport for London research is clear that BLE will improve journey times for customers and offer better connections within southeast London, and into central London. The Council will continue to work with the London Mayor/Transport for London to improve and enhance public transport across the Borough, including bus services.	No change.
Lewisham Cyclists	1	Section 03 Strategic objectives	We fully support the Council's visionary aims of becoming carbon neutral by 2030, and for 80% of all trips to be made by walking, cycling or public transport by 2041 (London Plan Policy T1). However, it should be noted that the Healthy Streets low scores attributed to the lack of safe cycle tracks, the amount of road space not managed under CPZ, and the low participation figures of cycling, the damage to health due to pollution hotspots, reveal that time to effect lasting and sustainable change is very limited.	Support noted. The Local Plan seeks to promote modal shift and discourage private car use. The policies are set in the context of addressing existing barriers to achieve this.	No change.
London Wildlife Trust	1	Section 03 Vision	**3. Vision, Strategic Objective and the Spatial Strategy** *Vision*	Noted. Whilst acknowledging the statement does not make specific reference to natural assets and features, the Local Plan recognises that	No change.

			Despite referenced in Table 3.1 we note there is nothing about protecting the best assets, such as those of the built heritage, or ecological value. It states "unique qualities of local neighbourhoods" which we feel requires a better definition. We would like to a statement of commitment to protecting irrecoverable irreplaceable assets (e.g. ancient woodland). This referenced to some degree in 1:3 (para 3.47), but suggest a bit more up front clarity here.	these are integral part of the Borough. The Part 2 and Part 3 policies provide further details on their protection and management.	
London Wildlife Trust	1	Section 03 Strategic objectives	We would like to see respect (from planning proposals and decisions) also applied to the diversity of the non-human residents of the borough as well.	Noted. Respect for natural environment is reflected in the objectives, for example, Objectives 9 and 13.	No change.
London Wildlife Trust	1	Section 03 Strategic objectives	*Strategic objectives* Table 3.1 • We welcome Strategic Objectives D (8-10), E (11-12) and F (13). • Under 8 – what does National Park City status mean? – we don't know, so would be good to include a definition of what it is, and how it will be measured and monitored? • Under 9 – support in principle, but protecting some of the best & most vulnerable assets means restricting or managing access.	Noted. The objectives and information for National Park City are set out in the London Plan.	No change.
London Wildlife Trust	1	Section 03 OL 01	*Key considerations* • Para 3.11 *Green and open spaces*: There appears to be a gap "*The network of green infrastructure is shown in*.[BLANK]" – we presume it is Figure 3.3 • Figure 3.3 This shows a patchwork rather than a network; it doesn't show gardens or rail corridors as such. Would expect a more detailed map in line with the NPPF's requirement of ecological networks.	Noted. The diagrams referred were included for illustrative purposes, to support considerations for the overall spatial and development strategy. The extent of designated open spaces and biodiversity sites is set out elsewhere in the plan.	No change.
London Wildlife Trust	1	Section 03 OL 01	*Spatial strategy options* • We are reassured by preferred option 1 • Option 3a puts increased pressure on an existing natural corridor (Ravensbourne & Pool rivers) which arguably needs to widen to ensure it can function more like a natural ecosystem and provide climate resilience • Figures 3.8-3.9 Strategic Green links appear to be mostly rail corridors; perhaps this should be made clear, as their ecological function is not the same, and there are 'gaps' in these corridors.	Noted. The diagrams referred were included for illustrative purposes, to support considerations for the overall spatial and development strategy. The extent of designated open spaces and biodiversity sites is set out elsewhere in the plan. A review of green corridors has been undertaken as part of the Open Space study update and has informed the Regulation 19 plan.	No change.
NHS (HUDU)	1	Section 03 Strategic objectives	**Vision, Strategic Objectives and Spatial Strategy** We welcome the inclusion of the Strategic Objectives particularly G, F and H with specific relevance to our work. While these recognise that the Local Plan can help address	Support noted. It is considered that the suggested changes are currently captured within the Local Plan vision, particularly where it states that Lewisham will become "a greener, healthier and more resilient place". The	No change.

			the wider determinants of health, and that development and the wider environment have an important role in the health and wellbeing this is not captured in the overall vision for the borough. We suggest the overall vision could be more ambitious in improving the quality of the environment and quality of life. Given the significant areas of the borough within the most deprived deciles of the IMD 2019 we suggest the vision reflects the more ambitious nature of the strategic objectives and refers to "*improving the quality of the environment, (green and built), quality of life and health and wellbeing of neighbourhoods while recognising and protecting their unique qualities"* . The Council needs to ensure that the individual sections and the plan, as a whole, maximise their contribution to the strategic objectives and that the review and monitoring mechanisms measure progress against the objectives.	Vision is a broad statement, which the Strategic Objectives link to, and provide further details in this respect.	
Sydenham Society	1	Section 03 Vision Strategic objectives	**3 Vision for Lewisham / Strategic objectives (p40)** These are supported	Support noted.	No change.
Sydenham Society	1	Section 03 OL 01	**Character-led growth** *3.11 The character of Lewisham's neighbourhoods is highly valued and contributes to its distinctiveness. Recognising this, we are seeking to facilitate character-led growth so that new development responds to the unique qualities of our localities and communities. The Lewisham Characterisation Study (2019) has been prepared to support the Local Plan. It identifies areas of the Borough where existing character may be reinforced, re-examined or re-imagined, as set out in Figure 3.2. The study provides an indication of opportunities where growth could be accommodated, including the London Plan Opportunity Areas and major centres, along strategic corridors (such as the A21) and in the Bell Green / Lower Sydenham area.* This approach is supported **Spatial strategy options (p58)** *3.16 Funding for the BLE has not yet been committed. It is therefore necessary to take a pragmatic approach to the BLE by planning positively to secure its delivery, but recognising that some or all phases may not be delivered within the plan period. We have therefore established 3 main scenarios with different assumptions on the BLE delivery*	Support noted. The Regulation 18 Local Plan document set out several spatial strategy options, recognising that some or all phases of the BLE may not be delivered in the plan period (including for reasons of funding). The preferred approach for the spatial strategy is therefore not dependent on the BLE. However the spatial strategy and the Local Plan policies aim to facilitate the delivery of the BLE, and provide flexibility to respond to it. The Council is aware of the work prepared by local community groups on Bell Green and Lower Sydenham, and the spatial strategy seeks to respond to aspirations for improvements in the area. The Council may in the future undertake further detailed work to help support the Local Plan, for example, a masterplan for the area.	No change.

			The Sydenham Society supports the designation of a new "opportunity zone" at Lower Sydenham/ Bell Green. In 2019 the Society worked with Discourse Architecture to put forward proposals for regeneration at Bell Green and produced an exhibition entitled "Bell Green Urban Renewal". This was displayed at local libraries in Sydenham, Forest Hill and Catford and was widely supported. The proposed scheme was linked to the long-held ambition by LB Lewisham for the extension of the Bakerloo Line southwards from the Elephant & Castle. However financial turmoil caused by the Covid-19 pandemic in 2020, together with the political imperative to concentrate strategic transport infrastructure improvements in the North, means that it is unlikely that phase 2 of the BLE will be delivered within the plan period. In their comments on the Local Plan Discourse Architecture state that redevelopment of Bell Green and Lower Sydenham should **not** be contingent on the Bakerloo Line Extension proceeding – the area suffers from high levels of deprivation and early interventions should be put in hand to improve the neighbourhood together with efforts to improve transport infrastructure.		
Thames Water Utilities Ltd	1	Section 03 OL 01	Growth Options The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure. The attached table provides Thames Water's site specific comments from desktop assessments on water, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed development sites, but more detailed modelling may be required to refine the requirements. We are in the process of creating long term drainage and wastewater management plans (DWMP) with objectives that overlap with those for Lewisham, such as sustainable drainage and water management. The local plan shows support from Lewisham for sustainable surface water drainage and engaging with relevant stakeholders because of the flooding risk, which we also support. Thames Water is addressing sewer flooding risk and welcomes support from the council to mitigate misconnections into the foul and surface water sewers. We continue to work with Lewisham to deliver the Thames Tideway Tunnel. Several proposed sites are adjacent to strategic and trunk sewers. Connecting directly into a trunk or chemical	Support noted. The Local Plan clearly sets out that developers should engage with Thames Water at the early stage in the planning process. The draft Local Plan includes policies dealing with wastewater and water supply, which will be reviewed an updated taking account of consultation feedback from Thames Water.	Local Plan amended to require development proposals to have regard to Drainage and Wastewater Management Plans. Local Plan amended to clarify that connections to trunk sewers should be avoided.

			sewer can be complex and dangerous, therefore they should only be considered where no alternative points of connection to local sewers are available. We don't allow connections to trunk sewers in greater London – instead, the developer will need to choose an alternative point of connection to a non-trunk sewer or requisition a new connection and associated pipe laying from us. If the developer applies for a requisition, we'll select a suitable connection point, which may not be your preferred connection point. Where a connection into a trunk or chemical sewer is necessary, we will insist on carrying out the work ourselves and recharge the developer under Section 107 of the Water Industry Act 1991. An application to connect must be submitted to Thames Water developer services as early as possible to allow time to conduct technical reviews and surveys as required – costs will apply. Please see more information on the application process for connecting into a trunk or chemical sewer https://developers.thameswater.co.uk/Domestic-and-small-commercial/Wastewater/Connecting-to-a-trunk-or-chemical-sewer **Process** We use the information in local plans to estimate when upgrades will be required. It is therefore important that the local authority keep us informed of any changes to local plan numbers and how well they are delivering homes against those objectives. Where this doesn't happen it could lead to delays in the delivery of vital infrastructure **Network** Where offsite upgrades are required to serve development they will be delivered and funded by Thames Water using infrastructure charges more info here https://www.thameswater.co.uk/developers/charges The time to deliver upgrades shouldn't be underestimated it can take 18months – 3 years from the time of certainty and in some cases it may be appropriate for a suitably worded planning condition to be attached to ensure development doesn't outpace the upgrades. Developers are encouraged to engage at the earliest opportunity to discuss their development needs via Thames waters pre planning service https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity		

			We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section. Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.		
Transport for London	1	Section 03 OL 01	The BLE Local Economic Impact Assessment, which we understand to have been subject to detailed analysis of the impact of the BLE along its proposed route, clearly shows that other than promoting good growth and economic development, there will be additional development impacts in north, central and south Lewisham along the BLE corridor. The draft local plan only shows notable additional development impact in Lower Sydenham area. In the local plan, it is not clear what development is associated with Phase 1 versus Phase 2 of the BLE. The scenarios with and without BLE show broadly the same levels of development, which is inconsistent with supporting statements that the BLE unlocks development (e.g., p. 73 (3.3.8) p. 439, p. 447-450). The only indication that the BLE unlocks development is in the footnote of Table 13.1 (p. 473) where a range is provided for the South because of BLE Phase 2. There is no indication in the housing numbers that BLE Phase 1 to Lewisham unlocks any development. To enable the differences between the scenarios to be clearly seen, it would be helpful to provide tables setting out the quantum of development with and without the BLE as identified within BLE Local Economic Impact Assessment which forms a supporting document to the draft local plan. We would also welcome further clarification of Figures 3.5-3.7 which are difficult to read. Note that Figures 3.5 to 3.7 are incorrectly referred to as Figures 1.5 to 1.7 in section 3.15 on p. 58.	The spatial scenarios set out in the Local Plan Regulation 18 document were based on detailed assessments included in the Integrated Impact Assessment (IIA). Maps of the spatial scenarios were included for illustrative purposes, and to support the public consultation in respect of reasonable alternatives / options for the strategy. The Local Plan stated that the IIA should be referred for further information. The indicative figures for housing quantum under each scenario are included in the IIA.	No change.
Transport for London	1	Section 03 OL 01	A caveat should be added to the maps, such as: '**The route selection for the Lewisham to Hayes section remains at an early stage and is subject to further development and public consultation by Transport for London'**. TfL will continue to involve the Council as options emerge, and decisions are taken. We would appreciate if phases 1 and 2 can be differentiated on the	Noted.	Local Plan Policy OL1 amended with supporting text on BLE route selection, as recommended. Plans which show the BLE amended to differentiate between phases 1 and 2.

			maps throughout the document by using a dashed and solid line to distinguish them.		
Transport for London	1	Section 03 OL 01	We further appreciate that the local plan identifies growth in well-connected locations—in Opportunity Areas, town centres and around stations—and clearly articulates the vision for reducing car use while encouraging walking, cycling and public transport use. We understand that the Council proposes to follow the London Plan standards for parking. We also note that the Council is considering car-free development in areas outside PTAL 4-6 in some circumstances, which is also strongly supported. Detailed comments in the appendix set out how this approach could be strengthened, and where some changes are needed. We recognise that alternative development scenarios are necessary given uncertainty relating to BLE funding. Although, scenario setting is sensible to address this uncertainty, we are concerned that the preferred scenario in the draft local plan is 'without the BLE'. This is contrary to the supporting statement that 'the new Local Plan is needed to help secure the delivery of the tube line extension'—a sentiment that is reflected throughout the document. It would be helpful to clarify the relationship between the local plan, and the BLE—i.e., the extent to which the BLE will unlock development across the borough. We recommend that the Council clearly articulates that Scenario 1 is not preferred but is instead being considered to allow for uncertainty of BLE delivery within the plan period. We have set out a number of comments and proposed changes on the following pages which we hope are helpful. We look forward to continuing our work together in drafting the final document.	The Regulation 18 Local Plan document set out several spatial strategy options, recognising that some or all phases of the BLE may not be delivered in the plan period (including for reasons of funding). The preferred approach for the spatial strategy is therefore not dependent on the BLE. However the spatial strategy and the Local Plan policies aim to facilitate the delivery of the BLE, and provide flexibility to respond to it. This includes provision for an uplift in site development capacities enabled by the BLE through higher public transport access levels, particularly in the Bell Green and Lower Sydenham area – this is signposted in the plan but it is acknowledged this could be made clearer. The Council is committed to supporting and enabling the delivery of the BLE through the Local Plan, but a pragmatic approach is necessary to ensure the spatial strategy is sound. General support for transport policies noted. The draft Local Plan will be reviewed and updated to ensure general conformity with the London Plan.	Local Plan amended to clarify Council's commitment to enabling the delivery of the BLE, whilst ensuring the plan is deliverable in the absence of the BLE.
Transport for London	1	Section 03 Strategic objectives	G 17 - We welcome the inclusion of Healthy Streets to deliver healthy and safe communities. We recommend including **'low traffic neighbourhoods (LTNs)'** as well that directly speaks to reducing pollution and promoting healthy lifestyles. Including LTNs in the local plan would give recognition to Streetspace for London and would be consistent with how schemes are described.	Support noted. It is considered that a new objective for 'walkable' neighbourhoods addresses this suggestion.	Local Plan amended to include new strategic objective for walkable neighbourhoods.
Blackheath Society no 2	1	Section 03 Strategic objectives	**Strategic objectives** Needs overarching aim of meeting local needs, securing improvements to existing spaces and places; and delivering high quality buildings and public realm. BEFORE addressing important themes A to I.	Noted. It is considered that the suggested aims are broadly encapsulated by the overarching objective, and then addressed in the subsequent ones at a high level. The remaining parts of the plan go into further detail on meeting different types of local needs and high quality development.	No change.
Quaggy Waterway Action Group	1	Section 03 Strategc objectives	**B HOUSING TAILORED TO THE COMMUNITY WITH GENUINELY AFFORDABLE HOMES**	Support noted.	No change.

			QWAG supports the Local Plan's aims to 3 *"Ensure Lewisham's existing and future residents benefit from good access to a wide range and mix of high quality housing, including genuinely affordable housing that is tailored to meeting the varying needs of the community, including the needs of those from all age groups at different stages of life, families and those with specialist housing requirements"* and 4 *"Foster and help to reinforce community cohesion through the provision of housing that enables individuals and households to both settle in the local area and remain rooted to it."* **QWAG Comments:** The need for quality truly affordable housing to meet local need is long overdue and so the intention of the Local Plan is to be welcomed. The quality of all housing should include the provision of quality green and open space both within development and nearby in support of health and community interaction and cohesion, learning and skills development and wider environmental outcomes.		
Quaggy Waterway Action Group	1	Section 03 Strategc objectives	**D. A GREENER BOROUGH** QWAG supports the Local Plan's aims to 8 *"Help London to achieve National Park City status and ensure all Lewisham residents benefit from access to high quality green space, by protecting, enhancing and connecting the Borough's network of parks, open and water spaces, including through delivery of a Green Grid to improve linkages to and between these spaces"* 9 *"Promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets - including trees, green spaces and water spaces - and seek to enhance existing assets or make new provision through new development wherever opportunities arise."* **QWAG Comments:** The Local Plan should note that London is already a National Park City; the issue is how well Lewisham contributes to London being greener, healthier and wilder. The Plan needs to set out how it will restore conditions for a range of species and habitats to thrive and play their role in bringing nature back into people's lives and providing resilience in a changing environment.	The Local Plan has been informed by an open space review and a review of the borough's SINCs.	Local Plan strategic objectives changed to acknowledge London is a National Park City.

			It is not clear if the Plan has been informed by a thorough baseline assessment of biodiversity and ecosystem function and any deficiencies. A green spaces review has been conducted but that is not necessarily the same thing. The Plan should be clear about the ecological condition and potential of the borough and where deficits can and should be addressed. The next version of the Local Plan should include this baseline in full with an explanation of how policies and actions have been informed.		
Quaggy Waterway Action Group	1	Section 03 Strategc objectives	**E RESPONDING TO THE CLIMATE EMERGENCY** QWAG supports the Local Plan's aims to 11 *"Realise long-term reductions in energy use and carbon emissions in helping London to become a zero carbon city by 2050, by increasing the use of sustainable transport modes - including walking and cycling - ensuring that new development is designed to reduce car use and maximise energy efficiency, along with integrating greening measures to limit the urban heat island effect"* 12 *"Guard against the risk of flooding by ensuring that new development is appropriately located, implementing sustainable drainage systems, retaining and enhancing flood defences including through river restoration works, along with improving the water quality of the rivers Thames, Ravensbourne, Quaggy and Pool."* **QWAG Comments:** Long term reductions require early action to get on a trajectory so the emphasis should not be on long term when action is needed now. River restoration is required for a range of reasons including natural flood defences. Improving water quality matters but the objective should focus on ecological quality of the river corridor and catchment as a whole, including water quality.	Noted.	Objective 12 amended to refer ecological quality and river corridors.
Quaggy Waterway Action Group	1	Section 03 Strategc objectives	**F CELEBRATING OUR LOCAL IDENTITY** QWAG supports the Local Plan's aim to 13 *"Retain, reinforce and help shape the distinctive character and identity of Lewisham's communities and townscapes by ensuring that all new development responds positively to the special attributes of its local context – including the cultural, historic, built and natural environment - and is designed, constructed and maintained to a high quality standard."*	Noted. Previously consented and delivered development is outside the scope of the Local Plan. The draft Local Plan sets out updated proposals and policies for water management, which will help give effect to key plans and strategies, such as the TE2100 and Lewisham River Corridors Improvement Plan. The plan includes development management policies and site allocations – the specific nature of river improvements will be considered on a case by case basis through the development management process.	No change.

			QWAG Comments: The Local Plan should support local distinctiveness but too much development has been permitted which is not resonant of or reflective of the locality, and could be plonked down anywhere. The opportunity to ensure that works to the rivers and their confluence in central Lewisham made the most of Lewisham being one of the few London boroughs with not one but two rivers flowing through the main urban centre, and with much of the borough's diverse population able to be involved and inspired by greater contacts with and knowledge of their local rivers. The Lewisham Gateway scheme has done the minimum possible with the rivers, which remain in concrete albeit with some artificially created meandering, riffles and flow, and the nearby small open space is of limited amenity and ecological value and does nothing to underpin local distinctiveness; the scheme happens to be in central Lewisham but it could be anywhere because it says nothing about the area. It remains unclear how the Local Plan will result in spaces and places which support and reinforce the borough's distinct environment, heritage and culture.		
Telegraph Hill Society	1	Section 03	We comment on this separately before commenting on Part One of the Plan in detail as we believe this is fundamental to the Plan.	Noted. Responses to representations set out elsewhere in the Consultation Statement.	No change.
Telegraph Hill Society	1	Section 03 Vision	4. The Vision set out in §1 **3.1**2 is aspirational. We would question however as to whether the Plan achieves this and in particular whether the policies are consistent with creating a place "*where all generations … choose to stay*". We comment within the body of this paper on the impact of high-rise buildings, the increasing density and the lack of green space. The Plan itself notes the lack of local employment but the Vision sets out nothing about changing this.	The vision, supporting objections and policy requirements within the Local Plan address issues of protecting and enhancing the boroughs green infrastructure as well as promoting job opportunities and growing the local economy.	No change.
Telegraph Hill Society	1	Section 03 Strategic objectives	The Strategic objectives do not appear to build on the Vision and the Plan does not follow it through. Whilst the Vision is long-term, the Plan is not, it is merely incremental, constrained by the Mayor of London's current London Plan whether or not that actually leads to Lewisham's Vision. Any plan should work forward from the Vision, starting from first principles of what the Borough should look like and then accepting that parts of such a plan would not be achievable whilst those current policies are in place and whilst funding is in short supply, but nevertheless setting out long-term goals and measurable targets. That way the Vision would be a true aspiration for the Borough and a bench mark for future policies.	Disagree. There is a clear link between the vision and the strategic objectives.	No change.
Telegraph Hill Society	1	Section 03	As set out, the Borough is in danger of repeating the mistakes of the last fifty years whereby it has become a	Whilst it is accepted that the Local Plan does promote high density development and tall buildings in appropriate areas. This will be part of the	No change.

		OL 01	dormitory suburb for the City with low employment rates and ever more high-rise buildings with small apartments, and with a proportion of residents moving out every year as they have families to find more appropriate accommodation elsewhere. The trend of developments of recent years, such as in Lewisham Centre and around Deptford Broadway, predominantly one or two bed units, appear to be continued in this plan (certainly as far as the illustrations show) and will ensure that the vision for that the vision for residents of all generations to choose to stay in the borough can NEVER be met, as single people go on to meet partners and partners choose to have children. Removing the restrictions on conversion of houses into flats will further exacerbate the problem.	mix of housing available within Lewisham. The borough has huge swathes of family housing as well as apartments which is can cater for a range of housing needs. The London Plan sets Lewisham's housing targets over a ten year period and the Local Plan has to demonstrate where that growth can be accommodated. The spatial strategy focuses this growth in opportunity areas and within town centres which are highly accessible, sustainable locations for growth. We believe this is the most appropriate response to the challenge not only from a sustainable development point of view but also to protect our lower density, family housing areas such as Telegraph Hill.	
Telegraph Hill Society	1	Section 03 Vision / Strategic Objectives	The Vision needs to start from long-term metrics as to, for example, the amount of green space each resident should have, the minimum suitable accommodation that would ensure residents can remain in the Borough for life, targets for the amount of employment in the Borough by 20403, targets for transport capacity and what might be, regardless of the current Mayor of London's aspirations, a reasonable population for a sustainable borough where everybody has an improved quality of life. In addition to these overriding metrics and their targets, there should be targets set for each of the **Strategic Objectives** set out on plan pages 50 and 51.	The Local Plan is informed by an in depth evidence base on a range of topics including housing need, open space assessment, transport assessment etc.	No change.
Telegraph Hill Society	1	Section 03 Vision / Strategic Objectives	Without such, it will be impossible to tell how the Borough is achieving its Vision. At present the Plan is woefully short on such metrics and quantified targets except where they are enforced by the Mayor of London's short-term population plan.	The Local Plan is informed by an in depth evidence base on a range of topics including housing need, open space assessment, transport assessment etc.	No change.
Telegraph Hill Society	1	Section 03 Vision	It may be inferred from the above that we do not believe the population increases that the Mayor of London is insisting upon are consistent with Lewisham "Vision". We understand the need to comply with the London Plan but if the ideal population level for the Vision is not in line with the current Mayor of London's strategy, this should not affect long-term goals. Such bits of the Vision may well need to be subordinated to the London Plan at present but could be lobbied for over the 20-year life of the Plan. Building tall tower blocks may not be the right answer for the Borough or its residents long-term even if the incoming London Plan requires them now and even if they are "right" for London as a whole.	The London Plan sets Lewisham's housing targets over a ten year period and the Local Plan has to demonstrate where that growth can be accommodated. Failing to do so would result in a general non-conformity from the GLA and we would be unable to proceed with the Plan. Failing to demonstrate how the borough can meet our housing targets would result in the council being placed under the 'presumption in favour of sustainable development'. This penalty means that the Council would have less powers to defend decisions at appeal on Local policy issues. We have seen other London boroughs in recent years lose planning appeals on Metropolitan Open Land (MOL) because they cannot demonstrate housing delivery and/or have an adopted plan that demonstrates how future growth can be met.	No change.
Telegraph Hill Society	1	Section 03	The Vision also needs to look at how to create more "15 minute cities" within the Borough with everything from	The Spatial Strategy for the plan and the visions for the sub areas are strongly based around a hierarchy of town centres within the borough. This	No change.

		Vision	all necessary shops, surgeries, schools, parks, sports facilities, museums and leisure centres within a 15 minute walk or public transport journey; and how shopping modes and delivery methods might change during the 20 years, considering how to cater for those. It also needs to look proactively at how connectivity could be improved rather than simply document schemes already on the drawing board: how difficult cross borough, rather than radial transport, can be improved (trams, guided bus ways, a council led pooled electric car system etc.), appreciating that, whilst the Council is not in control of such things, it can nevertheless lobby for them.	includes plans to re-inforce and enhance the roles of Lewisham and Catford as our primary centres and how these are supported then by our district and local centres.	
Telegraph Hill Society	1	Section 03 Vision	Finally, and very importantly, the Vision needs to be community-centric. If the intention is for a "*place where all generations not only live but thrive"*, the Plan needs to ensure that it looks to existing residents and their needs as well as taking account of future population growth. As part of this, it is fundamental that communities are involved. Communities that feel disenfranchised are not happy, thriving communities and will see the Council as their enemy not their friend. There is little in the Plan or Vision on community involvement. In our discussion of Part Four (paragraphs 260 to 263 and 269 to 270 below) we make recommendations as to what must be done to involve residents.	The plan has been informed by a series of evidence base documents including the Characterisation Study that was shaped by community groups and public consultation. The Council has also undertaken extensive consultation on many masterplan projects such as the Catford Framework, New Cross Area Framework etc. which again has fed into the development of the plan. Public consultation on the Local Plan will be carried out in accordance with our Statement of community Involvement. We very much appreciate the level of engagement that we have received through this Regulation 18 consultation.	No change.
Telegraph Hill Society	1	Section 03 Vision / Strategic Objectives	3 There is a reference in § 2.16 for floorspace targets this is based on estimated demand not on what is needed to achieve the objectives; furthermore it does not seek to quantify that in terms of employment levels for those living within the Borough. Whilst we appreciate that the role of a development plan is to regulate development, in order to realise its Vision for the borough, Lewisham Council itself has a wider role to play. It must be self-evident, for example, that, no matter what developers do on new sites, and the **Strategic Objective G17** cannot be met if existing pavements are allowed to deteriorate. TELEGRAPH HILL SOCIETY RESPONSE TO THE DRAFT LEWISHAM PLAN Telegraph Hill Society 2 April 2021 Page 3 of 58 Nor can it right for the Borough to impose conditions on green spaces on developers or tree preservation orders on residents to meet **Strategic Objective D9**, if it does not (to give another example) maintain the street trees in its care. We believe that the Borough should explain throughout the Plan how it will itself aspire to meet the Vision and Strategic Objectives as regards those assets for which it has responsibility and give commitments, where necessary, to do so. Without it the Vision ceases to	As you note the role of the Local Plan is to regulate development coming forward as planning applications as well as setting a vision for future growth and investment in the borough. The National Planning Policy Framework (NPPF) sets out that Local Plans must demonstrate how it will meet its assessed needs – including residential, employment and retail (town centre) floorspace. This has to be done within the plan In order for the plan to be found 'sound' through examination.	No change.

			become a vision for the whole of Lewisham, but a fragmented vision of unconnected development sites.		
Telegraph Hill Society	1	Section 03 Vision	If however the Plan is meant to be solely a Development Plan we would suggest that this should be made clear and the Vision and the majority of Part One relegated to supplementary material seeking to explain the development policies. In this case, Lewisham Council should develop a separate document setting out how it will contribute to the achievement of its Vision, taking account of the comments we make in this respect there.	Disagree.	No change.
Telegraph Hill Society	1	Section 03 Strategic Objectives	Whilst we comment briefly on the strategic objectives here, following the order of the sections in the draft Plan, more detailed reasoning for our views is given under our responses to the corresponding policies in Part Two. Brief cross reference is made here to a selection of those responses.	Noted.	No change
Telegraph Hill Society	1	Section 03 Strategic Objectives	We specifically welcome **Strategic Objectives C5 and Strategic Objective C6 ("Local economy")** (paragraphs 162 to 177).	Support Noted.	No change.
Telegraph Hill Society	1	Section 03 Strategic Objectives	**D9 ("A Greener Borough")** makes no reference to protecting gardens which contribute a larger element of the green space within the Borough than parks and are known to be significant in providing a cleaner atmosphere and in the mental health of residents (see also **Strategic Objective C**) and **Policy QD11**.	The draft Local Plan part 2 policies on Green Infrastructure recognise that residential gardens form part of the network of green infrastructure, along with other assets. The strategic objective refers to the Green Grid and green spaces, which is considered proportionate for an overarching objective. The plan must be read as a whole.	No change.
Telegraph Hill Society	1	Section 03 Strategic Objectives	**Strategic Objective E11 ("Responding to the Climate Emergency")** could also usefully cross-reference to **Strategic Objective H21 ("Transport capacity")** without which any aspirations to reduce car usage are likely to fail.	Agreed.	Strategic Objective H21 amended to also include a reference to reduction in car usage.
Telegraph Hill Society	1	Section 03 Strategic Objectives	We welcome **F13 and F15 ("Celebrating our local identity")** in principle although we dislike the phrase "*positively*" as this is capable of a very wide interpretation by developers. We would prefer "*sympathetically*" or better "*in keeping with*".	Disagree.	No change.
Telegraph Hill Society	1	Section 03 Strategic Objectives	**F15 ("Celebrating our local identity")** references conservation and enhancement of the historic environment, in our view, to make clear what "enhancement" means it should read "*conserving, restoring and enhancing*". (paragraph 145)	We feel that the wording is consistent with Historic England's terminology	No change.
Telegraph Hill Society	1	Section 03 Strategic Objectives	We welcome **G16-19 ("Healthy and Safe Communities")** but cannot see how the level of density of new buildings proposed in this Plan, with the tall towers that will be required to achieve this and the impact upon the already deprived and green-deficit northern part of the Borough, is compatible these Strategic Objectives. The impact of tall towers and lack of green space is already well known to have bad effects on physical and mental health and contribute to deprivation. (paragraphs 63 to 66).	We understand that tall buildings and high density development can be divisive however the Capital is tackling a housing crisis with the numbers of homelessness increasing. The Local Plan is being asked where the level of growth can be accommodated.	No change.

Telegraph Hill Society	1	Section 03	We note specifically that the Consumer Data Research Centre has ranked areas using data on pollution levels, health services, green spaces, pubs and gambling shops using its health index (Access to Healthy Assets and Hazards (AHAH)). Areas are ranked from 1 (Healthiest) to 10 (Unhealthiest). New Cross ward has a ranking of 10 and, along with Brockley ward, has the most unhealthy rating using AHAH in South East London.	Noted. The Local Plan broadly seeks to deliver healthier neighbourhoods, and this is a key theme running throughout the policy areas.	No change.
Telegraph Hill Society	1	Section 03 Strategic Objectives	There is are references in **H20 ("Infrastructure")** and elsewhere to providing the infrastructure to *"support growth"*. In New Cross we need the infrastructure to continue to support pre-COVID19 levels of activity which exceeded the system's capacity (assuming such capacity requirements will return). There should not be an inbuilt assumption of growth without some clarity as what is meant: population growth may not be consistent with **Strategic Objective A1** or indeed "*sustainable places*", whereas economic growth, to the extent that it does not adversely affect the climate emergency, is likely to be positive for all Strategic Objectives. We note that the objective will not be met by the current Borough policies which appear to allocate resources by ward without sufficiently considering the impact on neighbouring wards. Further issues are outlined in paragraphs 178 through 183.	The Local Plan is supported by the Infrastructure Delivery Plan (IDP) which outlines the infrastructure required to support the levels of growth planned.	No change.
Telegraph Hill Society	1	Section 03 Strategic Objectives	The second key objective, building on the Strategic Objectives and the Vision that Lewisham should be place in which people wish to live, should set out in more detail how the Plan seeks to address the deprivation in the Borough and specifically the health of the Borough's residents (see AHAH reference above). We believe, for example, that this will mean a commitment, for example, to establish new parks and open spaces within the Borough, particularly in the north of borough; to increase, rather than continue to reduce, the amount of green space available per person.	Addressing deprivation within the borough is a council wide priority and cuts across many themes and many departments of the Council. The Local Plan is one of a number of plans and programmes seeking to address this. With the support from those departments and programmes the Local Plan seeks to improve public transport accessibility, improve access to jobs, improve the quality and access to existing parks and open spaces, ensure that the necessary infrastructure such as school, libraries, community centres etc. is delivered to support growth. These and many other policies within the plan will contribute to addressing the issues of deprivation.	No change.
Telegraph Hill Society	1	Section 03	**3.9 ("Growth requirements")** states that the Local Plan *"must help to facilitate a significant amount of new development"*. As we have argued above it is not clear that this is compatible with the Vision for 2040 although we accept the short-term need for it to comply with the current London Plan and to address a back-log deficit of building in past years. However, the impact of COVID-19 will cause the level of new housing development required to be re-assessed whilst, in order to meet **Strategic Objective C6** and redefine the status of Lewisham, currently a mere dormitory borough, there may need to be a shift away from an emphasis on housing to an emphasis on hyper-local workspace and employment.	We have received updated population projections from the GLA which factor in the impact of COVID-19 and Brexit. These figures do not significantly change the predicted population growth for Lewisham. The London Plan sets Lewisham's housing targets over a ten year period and the Local Plan has to demonstrate where that growth can be accommodated. Failing to do so would result in a general non-conformity from the GLA and we would be unable to proceed with the Plan. Failing to demonstrate how the borough can meet our housing targets would result in the council being placed under the 'presumption in favour of	No change.

				sustainable development'. This penalty means that the Council would have less powers to defend decisions at appeal on Local policy issues. We have seen other London boroughs in recent years lose planning appeals on Metropolitan Open Land (MOL) because they cannot demonstrate housing delivery and/or have an adopted plan that demonstrates how future growth can be met.	
Telegraph Hill Society	1	Section 03	With regard to the reference in **§ 3.12** to *"Green and Open spaces"*: the terminology is unclear. Does it mean only spaces which are both green and open (i.e. "green open spaces") or does it include all spaces which are either (i.e. "green" or "open" spaces)? We would expect that the key consideration should apply to all spaces which are green, whether or not they are open to the public in view of the commitment of the Mayor of London to a 50% green city, which cannot be achieved without protecting garden and allotment spaces as well as public spaces. Therefore using "and" rather than "or" in *"Green and Open Spaces"* is misleading and potentially open to misinterpretation.	Noted. This representation refers to a map showing green spaces, which was used for illustrative purposes in considering spatial strategy options. This section will be removed in the Regulation 19 plan as it is not required. However it is acknowledged that the plan should make clearer the distinction between green and open spaces.	Local Plan policy on Open Space amended to make clear the distinction between open space and green space, in terms of the open space hierarchy. The glossary has also been amended for clarity.
Telegraph Hill Society	1	Section 03	There is a reference missing in the fourth line of this section to (presumably) to **figure 3.3**.	Noted. This representation refers to a map which was used for illustrative purposes in considering spatial strategy options. This section will be removed in the Regulation 19 plan as it is not required.	No change.
Port of London Authority	1	Section 03 Strategic objectives	**1. Strategic Objectives.** Support strategic objective 6 (employment land) which states that Council will increase the number and variety of local jobs and business opportunities, by making the best use of employment land and providing suitable space to support businesses of all sizes, along with securing affordable workspace and workplace training opportunities. Support the Greener borough objectives particularly objectives 8 and 9 which seek to protect, enhance and connect the Borough's network of parks, open and water spaces, and to promote and protect the ecological, biodiversity and amenity value, of the boroughs natural assets, including its water spaces.	Support noted.	No change.
	1	Section 03 Vision	Following the publication of the "Lewisham Plan 2021" I am a resident of the New Cross Gate area of the borough and have several objections that I need to raise about the proposal. Overall the vision is quite limited	Noted. Responses to other representations set out elsewhere in consultation statement. The vision is a broad statement about the type of place Lewisham will become in the future. The level of detail needs to be proportionate to the intent of the vision. Further details are set out in the strategic objectives and sub-area policies.	No change.
	1	Section 03 Vision	Relaxation of flat conversion policy and its impact on communities. This will lead to fractured communities and parts of the borough becoming used as dormitories for students instead of families.	Noted. The London Plan broadly directs the Local Plan to enable the development of small sites to meet London's housing needs. The Local Plan proposals for housing conversions help give effect to the London Plan policy, but provide locally specific requirements around the need to ensure family-sized units are re-provided where conversions are proposed. This is considered a sufficiently flexible but pragmatic approach.	No change.

The St John's Society	1 1 1	General	An unrealistic Local Plan will have a short-lifespan. Both Sadiq Khan and Boris Johnson recently reiterated their contention that Climate Change is the UK's foremost long term challenge that will be a reality by 2040. This one mentions climate change, it does not fully prioritise it. It was notable that the questionnaire for attendees of the Local Plan seminars did not offer climate change as one of the multiple choice options (despite, in earlier meetings, having acknowledged this omission). Recently, we polled residents of the St Johns and Brookmill Road Conservation areas to find out how they would prioritise 6 suggested alternative interpretations of the 19th century word 'conservation'. Although the second most popular choice was 'heritage', the top (highest priority) choice was 'biodiversity'. Although both criteria deserve careful consideration during planning exercises, it is obvious that energy conservation and community conservation issues are more important than preserving the historical details of older buildings. The Local Plan needs to clarify its paramount commitment to conserving the long-term health and viability of the planet. We suggest that the borough in its decision making and strategy needs to be more open to innovation, creative solutions, and a decoupling from 'old ways' in order to combat the issues and threats the borough, London and the whole planet will need to tackle together. We welcome the acknowledgement of the Climate Emergency and suggest it is given more weight than it is in the plan currently.	Noted. The Local Plan is being prepared through consultation with local residents and communities to understand priorities and key issues for the Local Plan to address. The online information sessions provided opportunities to participants to identify areas of interest, so that planning officers could tailor the discussion to those. Responding to the climate emergency is a key strategic objective of the draft Local Plan and this is fed through the spatial strategy and other detailed policies. The plan must be in conformity with national planning policy and the London Plan, and must be demonstrably deliverable.	Local Plan Part 2 policies on Sustainable Design and infrastructure reviewed and updated to strengthen approaches, where appropriate. This includes, for example, a new policy on sustainable retrofitting.
Telegraph Hill Society	1	Section 3 Strategic Objectives	We welcome the general principles **in Strategic Objectives B2-4 ("Housing Tailored to the Community with Genuinely Affordable Homes" together with G17-19("Healthy and Safe Communities")** However we question throughout our response whether these objectives are met by the policies which seem to favour accommodating putative new population over the needs of existing residents by providing accommodation which does not meet the aspiration of new residents whilst at the same time reducing amenity for existing residents. (paragraphs 63 to 66).	Disagree. The strategic objective and policies underpinning the objectives are clear.	No change.
Telegraph Hill Society	1	Section 3 Strategic Objectives	We have concerns over **F14 ("Celebrating our local identity")** and the reference to "*optimal use of land to facilitate the regeneration and renewal of localities within the London Plan Opportunity Areas*" since part of the Telegraph Hill Conservation Area and the whole of the neighbouring Hatcham Conservation are within an "Opportunity Area". Conservation Areas emphatically do not require the sort of "*regeneration*" and "*renewal*" envisaged by this element of the Plan, they require conservation. We would therefore propose the	Noted.	Strategic Objective F14 amended to recognise that not all localities within Opportunity Areas will necessarily require or be the focus of regeneration and renewal.

			introduction of the following words: "*optimal use of land to facilitate, where applicable, the regeneration and renewal of localities…." (paragraphs 34* to *36* and *40* to *50)*		
Telegraph Hill Society	1	Section 3	In **figure 3.1** the Key shows a single colour but the map has two shades of pink. We agree that Telegraph Hill should be scoped into considerations affecting the Telegraph Hill Conservation Area including, principally, those relating to the New Cross/New Cross Gate Opportunity Area. Indeed, for the purposes of considering the effects of developments in that area we believe that considerably more of Telegraph Hill is affected and should be scoped in. We do not believe it is correct, however, to include any part of the Telegraph Hill Conservation Area (or for that matter the Hatcham Park Conservation Area) as parts of an *"Opportunity Area"* despite the error in the London Plan. The definition of *"Opportunity Area"* as set out in the Glossary is an area which has the opportunity "*for accommodating large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility."* Clearly the two Conservation Areas do not meet this definition. The Plan needs to make a clear distinction between those areas which are, in themselves, *"Opportunity Areas"* and those areas which do not meet that definition but which are significantly impacted upon, and must be considered by, any proposals within the Opportunity Area.	The Local Plan opportunity area reflects those adopted in the London Plan. Whilst we acknowledge the Opportunity Areas do cover Conservation Areas including but not limited to those in Telegraph Hill any development coming forward in Conservation Areas will be assessed against the relevant heritage policies and any Conservation Areas Appraisals covering those areas.	No change .
Telegraph Hill Society	1	Section 3	In the on-line question and answer sessions sections we were informed that the Opportunity Areas were set by the Mayor of London and cannot be changed even if they are clearly wrong and include areas which cannot be Opportunity Areas as they do not fall within the definition. If, however, this is the case, the Plan can nevertheless still scope them out of development or, at the very least, flag the contradiction involved in including Conservation Areas within Opportunity Areas (given the definitions of these terms).	The Local Plan opportunity area reflects those adopted in the London Plan. Whilst we acknowledge the Opportunity Areas do cover Conservation Areas including but not limited to those in Telegraph Hill any development coming forward in Conservation Areas will be assessed against the relevant heritage policies and any Conservation Areas Appraisals covering those areas.	No change.
Telegraph Hill Society	1	Section 3	**Figure 3.2** highlights the Hatcham Works site as a *"Reinvent"* area. Whilst there can be no objection to reinventing the site, the Council should be aware of the depth of feeling against the type of proposals that were put forward (and withdrawn) by Sainsbury's and Mount Anvil in 2019-2020 where 77% of the respondents strongly objected. The results of that survey are given in Appendix 2.	Noted	No change.
Telegraph Hill Society	1	Section 3	**Figure 3.3** is headed "*green infrastructure*" whilst the colour code indicates that it shows "*Open Spac*e". These are not identical terms (see the definitions in the	Noted. This representation refers to a map showing green spaces, which was used for illustrative purposes in considering spatial strategy options. This section will be removed in the Regulation 19 plan as it is not required.	Local Plan policy on Open Space amended to make clear the distinction between open space and green space, in terms of the open

			Glossary). Confusion between *"green"* and *"open", "green or open"* and *"green and open"* abounds throughout the Plan and needs to be resolved.	However it is acknowledged that the plan should make clearer the distinction between green and open spaces.	space hierarchy. The glossary has also been amended for clarity.
Telegraph Hill Society	1	Section 3	**Figure 3.3** does not show all the green infrastructure of the Borough nor does it show all the open spaces. It shows public parks, nature reserves etc. The green infrastructure of the Borough includes private gardens, community owned gardens, allotments and street trees – all of which are important to the ecology.	Noted. This representation refers to a map showing green spaces, which was used for illustrative purposes in considering spatial strategy options. This section will be removed in the Regulation 19 plan as it is not required. The draft Local Plan part 2 policies on Green Infrastructure include maps on the network of designated open spaces, nature sites and the Green Grid. This will remain and provide the appropriate reference point, together with the plan policies.	The glossary has been amended for clarity on distinction on green spaces and open spaces.
Telegraph Hill Society	1	Section 3	With reference to **§ 3.18** and **figure 3.5**. We believe there is limited potential for growth at the Hatcham Works site at New Cross Gate unless and until the BLE is built. Whilst the site has high PTAL connectivity there is simply no capacity on local public transport, particularly on the existing rail services, to accommodate significant new passenger growth.	The Former Hatcham Works site has been safeguarded for the delivery of the BLE in line with the Ministerial Safeguarding Direction.	Local Plan amended to provide details on the BLE safeguarding direction. Local Plan amended to provide further details around the delivery and phasing of development in relation to the BLE.
Telegraph Hill Society	1	Section 3	As we have stated in paragraph 34, Telegraph Hill is partially included as an Opportunity Area when it clearly does not meet the definition.	The Local Plan opportunity area reflects those adopted in the London Plan. Whilst we acknowledge the Opportunity Areas do cover Conservation Areas including but not limited to those in Telegraph Hill any development coming forward in Conservation Areas will be assessed against the relevant heritage policies and any Conservation Areas Appraisals covering those areas.	No change.
Telegraph Hill Society	1	Section 3	**§ 3.24** states that Opportunity Areas these are also areas where neighbourhoods, businesses and local residents stand to benefit from focussed regeneration and urban renewal, particularly where deprivation is experienced. From the huge objections to proposed development by Sainsbury's/Mount Anvil at New Cross Gate it is not at all clear that there is benefit. Certainly, from our survey as part of the consideration of the Hatcham Works proposals, residents of Telegraph Hill did not feel they necessarily stood to benefit from the type of regeneration that was envisaged there then nor in the New Cross Area Framework**.** The area around New Cross Gate is deficient in green space and new development has the capacity to reduce the PER CAPITA amount of green space rather than increase it, as was seen from the Sainsbury's/Mount Anvil development proposals. The area also ranks high as being unhealthy (see paragraph 27). It is extremely difficult to see how developments of the size proposed at Hatcham Works (Lewisham Plan **page 603** *et. seq.*) can do anything other than make these problems worse. Parks and open spaces are needed, not more building and more people. **§ 3.25** states an aim for "*Opportunity Areas [to] fully realise their potential*". However, it does not state what that potential is. The potential for any Conservation Area left within an Opportunity Area is surely better heritage conservation and restoration. As far as the Hatcham Works site is concerned the best potential – given the quality-of-life issues in the area already referred to in	The site allocation for the Hatcham Works site was informed by the design work carried out for the New Cross Area Framework. The indicative capacities for the site recognise its highly accessible location with good access to public transport and local facilities. Whilst we appreciate the site is adjacent to conservation areas we believe that the site can accommodate the indicative capacities outlined. The Framework was subject to extensive consultation.	No change.

			paragraph 27– is for a park. Cramming more housing in does not realise any potential for existing residents whatsoever.		
Telegraph Hill Society	1	Section 3	We wholly agree with the statement that the Bakerloo line extension would be essential to supporting Opportunity Area objectives and providing the necessary transport infrastructure to facilitate a significant uplift in homes and jobs in the New Cross ward and it follows that no significant development should take place before the BLE is in place. However, we believe that other considerations outlined in these sections mean that, even with the BLE in place, there should be no significant uplift in homes.	Disagree	No change.
Telegraph Hill Society	1	Section 3	In summary, we do not believe Conservation Areas should be scoped in to Opportunity Areas as defined. However, they should be referenced for the purposes of taking into account the impact of Opportunity Area development on neighbouring Conservation Areas.	The Local Plan opportunity area reflects those adopted in the London Plan. Whilst we acknowledge the Opportunity Areas do cover Conservation Areas including but not limited to those in Telegraph Hill any development coming forward in Conservation Areas will be assessed against the relevant heritage policies and any Conservation Areas Appraisals covering those areas.	No change.
Telegraph Hill Society	1	Section 3	This section makes reference in a number of places to "growth" and we would refer you to our comments above in paragraph 28 as to the need to distinguish between population growth and economic growth. One does not imply the other and they sometimes conflict (for example: space devoted to small workshops for local employment is not available for housing).	The London plan sets out the definition of good growth which encompasses population and economic growth.	No change
Telegraph Hill Society	1	Section 3	We welcome the approach to re-vitalising local centres as outlined in **§ 3.33**. However as we argue in our comments on policy **EC12** and **EC14** (paragraphs 164 to 173) below, the concept of a 15-minute city means ensuring that employment, shops and services are where people live rather than people having to use transport (public or otherwise). In a 20 year vision, more needs to be done embrace this approach rather than that which is advocated here.	The Local Plan includes strategic objectives underpinned by policies throughout the document to enhance Lewisham's network of town centres, protect employment space, and provide additional employment and town centre floorspace contributing to growing the local economy.	No change.
Telegraph Hill Society	1	Section 3	**§ 3.35** states "There is an opportunity for greater intensification along strategic routes, where development responds to the status of the road and its greater degree of connectivity." It must be made clear in the Plan that this must not be at the expense of the historic fabric of the area. Similarly, the statement "give priority to movement by walking and cycling, as well as addressing vehicular dominance and reducing vehicle speed." needs to make clear that this is not to result in diverting more traffic onto residential side roads. Traffic should be confined to the existing main roads (see our comments on policy **TR1** at paragraphs 211 and 212.)	Any proposals coming forward along strategic routes which may have an impact on heritage assets will be assessed against the relevant proposed heritage policies. On the issue of traffic we agree that our intension here is not to divert traffic onto residential side roads.	Local Plan policy OL1 amended with additional supporting text around heritage assets and growth corridors.
Telegraph Hill Society	1	Section 3	A number of statements are made about traffic flows along key roads throughout the Plan, however the Plan only appears to consider the local traffic. The A2 in particular is the main route to London from Kent and cannot be considered in isolation from this larger	The Local Plan is underpinned by a Transport Assessment which informs the policy basis.	No change

			demand for movement through the Borough. We asked at a North Area Consultation meeting whether the Borough had figures for how much traffic on the major arterial roads was local and how much was generated from elsewhere in London or from outside Greater London. We received no answer, but this information is obtainable and must be key in deciding to what extent transport policies within the Borough can be implemented with effect.		
Telegraph Hill Society	1	Section 3	In considering road traffic a revised Plan should also take into account the needs of businesses and the elderly and infirm (not all of whom are eligible for blue badges) to use motor vehicles; it also needs to take into account potential increases in traffic as a result of the move to home shopping as we set out in our comments on policy **TR5** (paragraph 221).	The Local Plan reflects the London Plan model target of 80% of all trips made by sustainable modes, and 90% for inner London. We recognise that there is still a need for trips to be undertaken by vehicles.	No change.
Telegraph Hill Society	1	Section 3	One of the key needs in reducing vehicle traffic is giving consideration to cross-London traffic flows. Routes are well served radially but poorly served east-west even within the Borough. We deal with this further in our comments on Section 12 of the Plan (paragraphs 200 and 201) below.	Noted.	No change.
Telegraph Hill Society	1	Section 3	**§ 3.44** states "Elsewhere, the Local Plan will support the sensitive intensification of smaller sites throughout the Borough. The development of smaller sites (including on backland and infill sites, as well as residential extensions) will be important to meeting future needs, particularly for housing. We will prepare guidance documents to support the Plan policies and to help ensure that development of this kind is appropriate to its location and wider setting." We strongly object to backland and infill development other than on brownfield sites. We note the protection of back gardens that Policy **QD11** seeks to establish but feel it does not go far enough with protection of all garden space. For the reasons we set out in paragraph 115, gardens are hugely important in those areas of the Borough, particularly in North Lewisham, where is there is a lack of green space and access to nature.	We feel that the policies within the Local Plan provide a suitable balance between protecting back gardens whilst allowing sensitive intensification of smaller sites throughout the Borough. The policies will be underpinned by design guidance within the newly adopted Small Sites SPD.	No change.
Telegraph Hill Society	1	Section 3	We would generally support **§ 3.46** which states that the Borough "*recognise(s) that good design is integral to good planning. This means that new development must be based on an understanding of the site context and respond positively to the Borough's local distinctiveness. The use of the design-led approach will help to ensure that those unique and valued features of our communities remain at the heart of the spatial strategy, and are fully considered in planning decisions.*"	Support Noted.	No change
Telegraph Hill Society	1	Section 3	However, we are not convinced that a "*design-led*" approach will bring this about. There is little evidence that any "*design-led*" development has done this in the	The concept of a "design-led" approach is established from national policy through to regional and local policy.	No change.

			Borough to date. The approach needs to involve those who live in the area and **§ 3.46** should reflect this. Whilst we appreciate that the Council has a Design Panel, this comprises mainly of professionals and not of those who will have to live in the areas affected by the designs considered. The Borough should make a commitment to improving consultation processes, when funds allow, by supplementing the Design Panel with the Amenity Societies Panel which previously provided this involvement but was cancelled due to a stated lack of resources. It would also be helpful if the Borough could commit to assisting in the production of Neighbourhood Plans, should the funds be available, as these are difficult for many of the smaller but well defined neighbourhoods, such as Telegraph Hill, to produce without such support (see our comments on Part Four in paragraphs 259 through 270).	Consultation processes for planning applications are carried out in accordance with national legislation and in line with the council's adopted Statement of Community Involvement.	
Telegraph Hill Society	1	Section 3	Again, we also take issue with the word *"positively"* in this context in **§ 3.46** - see our comment at paragraph 42. For Conservation Areas, "*Good design*" will also need to be led by revised Character Appraisals, with considerably more detail than the existent ones, and more developed SPGs. We would welcome a commitment to this, when funds allow, in the explanatory section of the Plan here.	Policy HE 2 outlines our approach to development within Conservation Areas., which is considered to be consistent with national planning policy. The draft Local Plan requires development proposals to submit a Heritage Statement. Policy HE1 sets out the Council's approach to foster greater understanding of the historic environment, including assessment, monitoring review of assets, which could include but is not limited to CA appraisals. One of the key monitors in the Local Plan monitoring framework is the adoption of Area Appraisals and Management Plans for all conservation areas	No change.
Telegraph Hill Society	1	Section 3	We support the principle of **§ 3.47**. A specific statement should be made to the effect that new development must help to reinforce the special characteristics of the Borough. We would also refer to the need to specify assistance to residents in working to defining those special characteristics still further, in order to ensure that they are preserved thereby supporting **Strategic Objective F13.**	Noted. The special characteristics of the borough will be considered on a case by case basis. In terms of built and natural environments, the Council has prepared an extensive evidence base which helps to identify and distinguish these, which development proposals will be expected to have regard to. The Council will continue to engage with local communities to broaden understanding of local distinctiveness, including through the formal plan-making and planning approvals process.	No change.
	1	Vision	While it's good to have a long term plan for the borough, we respectfully ask you to be far more ambitious and specific with your vision and to set ambitious and measurable targets to ensure that that vision is realized. At the moment, your 'vision' is more like a 'vague hope'. Lewisham's vision needs to have a far more 'active' aim. Such As: <u>We will ensure that Lewisham has the best quality of life for residents of any London Borough</u> You then need of measurable standards to map progress against over the next 20 years. Standards should include things like: • per capita ratio of people to open public green spaces • breathable air quality	Noted. The vision is an aspirational statement about the type of Lewisham will become over the plan period. It is supported by strategic objectives and planning policies which will help to achieve the vision. Part 4 of the Local Plan sets out a monitoring framework with targets along with indicators to measure performance of the plan, which is divided in to thematic policy areas. These additional monitors/indicators generally address those suggested by the representation.	The Part 4 monitoring framework has been reviewed and updated with additional indicators.

			• access to quality education • support for local business • protection of heritage street scenes and architecture • access to family housing • access to local work and support of local services for all, like medical facilities and healthy living services • etc Within each of those standards, in order to measure your success at the end of 20 years, there should be a series of targets, able to be measured at regular intervals to chart progress. e.g. we will take the necessary steps to ensure AIR POLLUTION will be 50% lower than it is today by the end of 2040. (with steps listed you take to achieve this year by year until 2040.) e.g. for Green Space – we will have a target of establishing x number of new parks and nature reserves to ensure the ratio of people to Green space is 50% or 75% better (or whatever benchmark you choose to evidence success) than now by the end of the 2040 e.g. for access to family housing – we will have a target for everyone on the Lewisham Council Homes waiting list to have been offered a social home by the end of 2040 e.g. for protection of Lewisham's heritage street scenes, we will have a program of works set out to restore, retain, protect local heritage over the next 20 years. (This could include everything from creating new Conservation Areas, to more stringent protections for traditional high streets and residential areas etc.) Not everything will require funding….but all will require will and creativity and the adherence to quality standards to ensure targets are aspirational and achieved. E.g. while it may not be possible to build any new Council housing in the next 5 years, you could commit to keep reviewing the target to house everyone on the council housing waiting list as soon as its possible, whether that be by turning unoccupied office space above shops into council homes or building in 5 to 10 years' time, when economic & political circumstances are different. e.g. regarding protecting Heritage, targets could include to - strengthen Conservation Area codes for developers/ to - deliver a program of restoring traditional street lighting & paving & front garden walls in conservation areas where residents can choose to contribute where homes are not Council owned. Etc etc.		

Lewisham Local Plan

Regulation 18 consultation statement

Appendix 2 – Regulation 18 Draft Local Plan Written Responses Split Part 2

September 2022

Organisation (if relevant)	Part	Section, policy or paragraph	Comment	Council officer response	Action
	2	CI	Separately, the plans to build so many new homes without concomitant infrastructure are simply pandering to the developers' greed. Any new build should be accompanied by plans for new social infrastructure such as schools and GP surgeries. I would like to see such planned infrastructure developments explicitly names in Lewisham's Local Plan.	Noted. The Local Plan identifies and makes provision for the infrastructure required to support the levels of planned growth. The Local plan is supported by an Infrastructure Delivery Plan (IDP), which sits alongside the Local Plan, and will help the Council to work with developers and other stakeholders to secure the delivery of community facilities. Part 2 Policy CI1 requires major developments to contribute to the delivery of community infrastructure as identified in the IDP.	No change.
	2	CI	I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a vibrant community centre and parking facilities especially needed by older people when shopping etc.	Agree. The Local Plan identifies and makes provision for the infrastructure required to support the levels of planned growth, informed by the Infrastructure Delivery Plan.	No change.
Blackheath Society no 2	2	CI	Surprised that there is not more specific emphasis on a wider range of community facilities, as trailed in the opening pages of this section e.g. schools and education facilities, surgeries and healthcare facilities, social care facilities, place for communities to meet indoors and reinforce neighbourhood engagement (e.g. in Local Assemblies, planning consultations) and cohesion. Some areas have a deficit of neighbourhood meeting space and have to rely on churches and church halls, and busy public realm in leisure and shopping facilities (e.g. Lewisham town centre). Has an audit been done of available public meeting spaces? Blackheath has little.	The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The level of detail included in the IDP is considered to be proportionate in scope. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	No change.
Climate Action Lewisham	2	CI	**Community infrastructure** The Community infrastructure part of the plan gives details on the localisation of services such as childcare and health, and this is excellent, but retail, business and leisure provision on a local level need to be part of a landscape of local, accessible and human-level communities that are genuinely healthy and positive to live in. The principles of localisation that are explored in the community infrastructure section must not be siloed but rather need to be applied across the plan in particular with regard to creating sustainable transport that provides for residents' needs within walking distance of their homes, supporting vibrant small business and attractive public realm on a local level so that the incentive to walk and cycle is higher than the disincentive to drive.	Noted. The Local Plan must be read as a whole. This section of the Local Plan will work in conjunction with others, which address design, healthy and accessible environments, town centres and liveable neighbourhoods. In addition, Part2 Policy CI1 through the Infrastructure Delivery Plan supports the delivery of community facilities where they are needed in the borough.	No change.
Culverley Green Residents Association	2	CI	In common with many of our previous comments on lost opportunities and learning lessons (e.g. Lewisham Gateway) a useful lesson could be learnt from the recent revamp of Beckenham Place park. A wonderful project to remove the golf course and create a new accessible open space. But the chaos of the opening weekend with the lack of security and supervision and the failure to think through how people would	Noted. The management of parks and open spaces is outside the scope of the Local Plan. For new development including public realm or open space, the Local Plan states that the Council may require Management Plans.	No change.

			break down barriers, overcrowd the 'beach', fail to supervise their children, park all over the grass areas and the continuing pressure caused by its popularity threatens to fatally damage all the hard work that went into creating it. If covid persists and we are stuck with staycations for a while then open spaces need to be very actively managed and controlled to make them safe and enjoyable for all.		
Lewisham Liberal Democrats	2	CI	1. An increase in housing has to be accompanied by a plan to increase services locally, e.g. schools, doctors, dentists, etc.	The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	No change.
NHS (HUDU)	2	CI	London Plan Policy S1 of the London Plan requires boroughs to undertake a needs assessment of social infrastructure. We understand this has not been undertaken yet and look forward to contributing to this in advance of the next stage of the local plan.	The Local Plan identifies and makes provision for the infrastructure required to support the levels of planned growth. The Local plan is supported by an Infrastructure Delivery Plan (IDP), which sits alongside the Local Plan, and this addresses community facilities / social infrastructure (covered in Section 3 of the IDP). The Council has and will continue to liaise with the NHS on the preparation of and review of the IDP.	No change.
South East London Labour for a Green New Deal	2	CI	Lewisham has a growing population with a need for community facilities, open to all; the consultation notes that many existing community facilities are in a poor condition. These facilities are key to health and well being, (especially in deprived areas). Budget cuts mean that at the moment they are not being protected, let alone expanded to meet new need. This must be a key campaign for Lewisham and other London boroughs and must feature prominently in contributions and development proposals for the major site allocations in the borough.	The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	No change.
Telegraph Hill Society	2	CI	New and enhanced community infrastructure will clearly be needed in order to support any population growth or, in certain areas, to meet the Borough's Strategic Objectives for the existing population irrespective of such growth. However, the built infrastructure alone is pointless unless there are the resources to staff and run the facilities provided. Without those resources any new development will disadvantage existing residents, not meet the needs of new residents and fail to meet the Council's Strategic Objectives.	The management of community facilities and social infrastructure including staff resources, are outside the scope of the Local Plan.	No change.
Telegraph Hill Society	2	CI	We appreciate that at present CIL and s106 cannot be used to run such revenue-based resources and therefore the Council should only allow development to proceed where it is certain that service providers, such as the NHS, have the resources available to staff and run the facilities. The Council, in the Plan, should also, in our view, express an intention to lobby	The management of community facilities and social infrastructure, including staff resources, are outside the scope of the Local Plan.	No change.

			Government to change the rules such that such facilities can be provided and maintained out of CIL and s106 monies.		
Blackheath Society no 2	2	CI 01	**CI1 Safeguarding & securing community infrastructure**. We strongly support this policy, especially A regarding use of IDP to plan and monitor delivery against need. Suggest use “protect” instead of “safeguard” because of latter’s specialist meaning.	Noted. It is considered that the term safeguarding is appropriate, and is well established in planning policy terms (including in the London Plan).	No change.
Deptford Society	2	CI 01 CI 02	**Page 331-337** Policy CI1 and CI2. Throughout the community infrastructure section, ‘need’ is referenced a lot, with no indication of intended mapping or data collection of existing community infrastructure. An understanding of how ‘need’ is determined, or a plan to capture the existing infrastructure would be welcomed. The flexibility of spaces to maximise a wide range of uses and end users is very clearly promoted through these policies. Care must be taken to not undermine community infrastructure which supports marginalised groups or other specific groups to strengthen resilience and engage in life activities. Some exclusivity and specificity can be helpful, where community infrastructure plays an important role in how groups build relationships and participate locally, as well as how equality barriers are addressed.	Noted. The Local plan is supported by an Infrastructure Delivery Plan (IDP), which sits alongside the Local Plan, and this addresses community facilities / social infrastructure (covered in Section 3 of the IDP). For each main type of infrastructure, the IDP sets out a position on current provision and future need, drawing on the evidence and strategies from the Council and key stakeholders. Whilst provision is not presented in a mapped format, the overall quantum of infrastructure provision and spatial distribution has been considered. In general, the Local Plan includes policies which safeguard existing community facilities.	No change.
Grove Park Neighbourhood Forum	2	CI 01	Currently, there no youth or public funded community provision within in Grove Park Ward. CIL needs to fund these and Grove Park Neighbourhood Plan priorities. All community infrastructure in Grove Park are constantly under threat, and greater emphasis should be placed on their protection and safeguarded as community spaces. This includes Grove Park youth Club and The Ringway Centre.	Noted. The Local Plan includes policies which provide for the safeguarding of community facilities. The Infrastructure Delivery Plan identifies specific infrastructure projects needed to sustainably support future population growth and housing delivery in Lewisham. If groups have specific community projects they wish to promote these can be submitted through the Neighbourhood CIL process.	No change.
HopCroft Neighbourhood Forum	2	CI 01	Community Infrastructure: • Policy CI 1 – safeguarding community infrastructure There are two community buildings in Crofton Park Ward at risk of being demolished without community consultation namely the Eddystone Road British Legion Community Hall and the Courtrai Road Scout Hut that is listed as an Asset of Community Value. There is a strong community need for both sites. The children’s nursery based at St.Hilda’s Church have been long seeking their own premises and have expressed an interest in the British Legion and the Crofton Park Scouts are very over subscribed with no green space for outdoor pursuits. There are several other groups including families of children with special educational needs seeking safe community spaces close to green space such as both of these. As there is a particular need for children and youth based community services in Crofton Park Ward an infrastructure delivery plan should be produced and policies should reflect this. Because the Scout Hut site at Courtrai Road is a green space that is also an Asset of Community Value it should at the least be a **Local Green Space.**	Noted. Noted. The Local Plan identifies and makes provision for the infrastructure required to support the levels of planned growth. The Local plan is supported by an Infrastructure Delivery Plan (IDP), which sits alongside the Local Plan, and will help the Council to work with developers and other stakeholders to secure the delivery of community facilities. In general, the Local Plan includes policies which safeguard existing community facilities. Regarding Scout Hut Site - following the Local Plan Regulation 18 consultation, an Open Space Review and an Update of the MOL Review have been prepared, including the assessment of additional sites. These studies have informed designations to protect open spaces within a clear hierarchy.	In accordance with the Metropolitan Open land Review Additional Sites Report, the Forest Hill to New Cross green corridor, which includes Scout Hut Site, has been designated as a proposed Metropolitan Open Land, which has the same level of protection as Green Belt.

London Borough of Bromley	2	CI 01	Policy CI1 states that the Council will work collaboratively with stakeholders to identify current and projected future requirements for community infrastructure, and to secure the necessary provision of this infrastructure. This is supported but we consider that it might be useful to cross-reference specific large-scale development areas in particular, as these are likely to result in the need for increased provision, for example school provision. In terms of Lewisham and Bromley collaboration, the proposals at Bell Green and Lower Sydenham could result in significant requirements for community infrastructure. The proposed SPD/masterplan mentioned in policy LSA3 could be an opportunity to discuss infrastructure requirements and embed specific requirements that address infrastructure needs in both Boroughs.	Noted and support welcomed. It is considered that the policy adequately addresses scope for joint working on large scale development projects. The Council will continue to work proactively and positively with neighbouring boroughs, including LB Bromley, through the Duty to Cooperate.	No change.
London Wildlife Trust	2	CI 01	We support this policy, and the recognition of the borough's green spaces and nature reserves as being part of the community's infrastructure.	Support noted.	No change.
NHS (HUDU)	2	CI 01	**CI1 Safeguarding and protecting community infrastructure** Proposals for major development will be expected to, and all other development should, plan positively to meet local area needs for community infrastructure. Major developments strike *will* be required *to* deliver community infrastructure *either by expanding capacity of accessible existing facilities* or on-site, where feasible, particularly in those areas where there are acute deficiencies in facilities or services, as identified in the Infrastructure Delivery Plan. All major development should be required to contribute to health infrastructure (universally needed and used infrastructure) where there is insufficient capacity to meet the needs of the new population. The priority is to expand capacity within existing health sites to ensure affordable and sustainable infrastructure, however, where the SELCCG/ICS estate strategy has identified the need for a new facility or the scale of the development/s in the locality then it may be appropriate for additional capacity through new facilities on site. However, acute and other specialist health infrastructure is provided on a wider catchment area and therefore off site contributions will be expected for this.	Noted. It is not considered appropriate for all major development proposals to contribute to health infrastructure. However, it is acknowledged the plan should be amended to ensure applications assess needs generated by the development and appropriately respond to this.	Local Plan amended as suggested. Local Plan amended to state that development proposals must demonstrate how any additional demands for community infrastructure generated by the development will be appropriately addressed.
NHS Property Services	2	CI 01	**Policy LP17 CI1 Safeguarding and securing community infrastructure** NHSPS support the Council's intention to work collaboratively with stakeholders to identify current and projected future requirements for community infrastructure, and to secure the necessary provision of this infrastructure. It is also welcomed that the Council recognise and support investment plans and strategies for the provision of health facilities and services	Support noted.	No change.

			NHSPS agree with Policy CI1 C, which sets out that all development proposals should make the best of use of land, including the public sector estate. NHSPS are already working to deliver on this policy aspiration, which seeks innovative approaches to community infrastructure provision (such as the co-location of services, shared use of facilities and development of multi-use facilities). It is however felt that Part C could be strengthened to support the provision of housing alongside new and improved facilities. NHSPS recognise the need to protect against the loss of existing community infrastructure and support the aims of draft Policy CI1 part D. NHS organisations are regulated outside of the planning regime and there is significant oversight by parties such as CCGs, NHS England and NHS Improvement who take a 'forward view' on healthcare planning needs. This involves significant amounts of consultation with stakeholders in relation to any service changes that they propose. Such oversight and consultation ensure that, in relation to healthcare premises, service reconfiguration is undertaken on a sound basis that does not prejudice service delivery for the foreseeable future The loss of existing health service facilities will only be permitted where facilities are declared surplus to need as part of any strategic restructuring of health or emergency services and after appropriate consultation. NHSPS therefore support Part D(c) of Policy CI1, which allows for the loss of community facilities directly associated with a public service transformation programmes and necessary to enable or sustain the delivery of service improvements and related investment in community infrastructure. Importantly, Part D(c) can operate independently from Parts D(a) and (b), which NHSPS support. The policy as drafted is also considered in accordance Part F2 of London Plan Policy S1, Developing London's social infrastructure, and therefore supported.		
Sport England	2	CI 01	CI1 - Safeguarding community infrastructure Sport England objects to the wording of this policy as it is not considered that it provides adequate protection for sport facilities as per the London Plan and NPPF. Any lack of current or future need can only be demonstrated by a robust and up to date assessment such as the Playing Pitch Strategy. It is also not appropriate to allow the loss of sport facilities where the development is associated with a public service transformation programme as this is not one of the circumstances outlined by the London Plan and NPPF. The	Noted.	Local Plan policy CI1 amended to make clear that the policy dealing with the loss of facilities does not apply to sports and recreation facilities.

			London Plan and NPPF also do not allow for 'exceptional circumstances' where the use of payment in lieu in considered acceptable. In London Boroughs this is generally considered to be particularly inappropriate for mitigating against the loss of sport facilities, as finding alternative land to reprovide these facilities is not always feasible. The NPPF and the London Plan also don't state that a sports facility's 'viability' is a consideration. Sport England would also expect that this policy make reference to the borough's Playing Pitch Strategy as a starting point when considering any potential loss of sport/playing field. Sport England therefore **objects** to this policy wording as it is not in line with national and regional policy and does not provide adequate protection for sport. The London Plan states: *Existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless:* *1) an assessment has been undertaken which clearly shows the sports and recreational land or facilities to be surplus to requirements (for the existing or alternative sports and recreational provision) at the local and sub-regional level. Where published, a borough's assessment of need for sports and recreation facilities should inform this assessment; or* *2) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or* *3) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*		Local Plan policy CI3 amended with a new sub-section on sport and recreational land and additional policy criteria to ensure development proposals comply with London Plan policy S5.
Theatres Trust	2	CI 01	Policy C1: Safeguarding and securing community infrastructure This policy sets strong criteria for the protection of valued community facilities, which can include theatres and other cultural uses. It is reflecting of NPPF and Local Plan policy, and we support it.	Support noted	No change.
	2	CI 02	Indoor Community spaces need to be big enough to enable groups of people to do exercise indoors, whether that be tea dance classes for older people, badminton classes or exercise classes. Planning to take this into consideration	Noted. The draft Local Plan Policy CI2 seeks to ensure that new community facilities are designed to be fit-for-purpose and adaptable to accommodate a wide range of activities and users.	No change.
Blackheath Society no 2	2	CI 02	**CI2 New & enhanced community infrastructure**. Support policy.	Support noted.	No change.
Telegraph Hill Society	2	CI 02	**Policy C12** must make it clear that the design principles in policies **QD1** to **QD13** also apply. The current draft seems to read that proposals will be supported provided that policies **CI2.A.a** to **CI2.A.f** are met regardless of how bad the design might be.	Noted. The Local Plan must be read as a whole. The draft Local Plan CI2 policy must therefore be considered in conjunction with other design policies. A cross-reference is not considered necessary.	No change.
Telegraph Hill Society	2	CI 02	No consideration is given to car usage in policy **C12** other than reference to adverse impact in **C12.A.f.** Whilst it is understood that non-car usage should be encouraged, it must be expected that a proportion of the users, especially for play-clubs,	Noted. Car parking for development proposals involving community infrastructure will be considered in line with the London Plan parking standards. Further details are set out in the Part 2 section on Transport and connectivity. These	Local Plan parking policies amended to ensure

			medical facilities, leisure facilities, theatres, cinemas and other performance space, will use cars. Indeed, until there is wider provision of safe public transport such facilities, although desired, may not be financially viable unless car parking is considered, even if it is only provision for dropping-off and picking-up. We believe this issue should be addressed in the Plan.	policies will be reviewed and amended to ensure conformity with the London Plan.	conformity with the London Plan.
Telegraph Hill Society	2	CI 02	As regards siting of community infrastructure, consideration needs to be given over the 20-year length of the Plan to improving decentralisation. Whilst fewer but larger schools, leisure centres and medical facilities reduce costs and provide a wider range of services, they also make access for the elderly, infirm and those without cars more difficult and increase car usage for those who do have them. In particular, residents (if they do not have a car) are less likely to use leisure facilities unless they are with a reasonable walking of their homes – 15 minutes is generally accepted as a target distance to be achieved. A move towards a more distributed provision of tiered services should therefore be planned over the life of this Plan in order to meet **Strategic Objective G18**.	Noted. The draft Local Plan Policy OL1 (spatial strategy) supports the 15-minute neighbourhood concept as a means to help ensure services and facilities are within easy reach throughout the Borough. Policy CI1 provides in principle support for new models of infrastructure and service delivery. The supporting text makes clear that any such process to consolidate or reconfigure services, will need to be carefully managed in order to ensure there is sufficient capacity within local neighbourhoods.	No change.
The St John's Society	2	CI 02	COMMUNITY INFRASTRUCTURE Needs for a realistic approach to delivering key social infrastructure: schools, doctor's surgeries, parking, roads, nurseries, cycle lanes, vehicle charging points etc. (considering the amount of extra housing that is proposed)	The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan. The IDP has been prepared through collaboration with internal and external delivery partners, and is therefore considered to be realistic.	No change.
	2	CI 03	I've been wondering about your calculation of the amount of play space using the minimum 10 sqm policy and think it must be an overestimation. I don't know if you are aware that the total amount of dedicated play space is worked out from a child yield calculator. I've attached the calculation for Convoys Wharf plots 8 and 15. The calculator they used has been revised because it underestimated the number of children, for example by assuming that people in 2 bedroom accommodation tend not to have children. Because of overcrowding arising from the lack of affordable property families do move into 2 bedroom units. The calculator was revised in 2019. Here is a link to the GLA population yield calculator: https://data.london.gov.uk/dataset/population-yield-calculator. Some boroughs have adapted it to suit their own population distribution. It would be good if Lewisham could do the same. I like the plan where you've shown the green routes, which would also be playable space for children. Both the minimum 10 sqm space and playable routes are important.	Noted. The Local Plan adopts the London Plan minimum standards for children's play space. When assessing planning applications, the Council will use the London Plan and its latest Supplementary Planning Guidance to calculate and secure the appropriate amount of formal children's play space provision. This will ensure that any updates to the child yield calculator are taken into account. Development for which planning consent has been granted is outside the scope of the Local Plan.	No change.
Blackheath Society no 2	2	CI 03	**CI3 Play & informal recreation**. Much of the East Area, especially in Blackheath Ward, is deficient in play space (see Figure 9.1), despite high residential use and lots of family homes. There is also a deficiency of public sporting facilities	Noted. The Local Plan seeks to respond to the identified deficiency in play space in different parts of the Borough, including the east area. Policy CI3 sets out specific requirements for new development to provide play space,	Local Plan policy CI03 amended with additional requirement for

			and toilets in and around Blackheath. Given this, the target to avoid loss of Community Facilities (DM5 Table 19.1) seems very complacent and unambitious. Token provision by new developments of small, overshadowed, badly maintained play areas next to busy roads (e.g. at Tuscany Corte in Renaissance next to busy Loampit Vale) should be avoided in favour of upgrading existing, more suitable facilities (e.g. Cornmill Gardens for Renaissance). Would like to see better play space provision and maintenance, in large, well-maintained sites away from roads, strategically-placed within 15 minutes of every home and sized according to local population density and composition.	and address deficiencies, however it is acknowledged that the requirements could be strengthened.	development within play space deficiency areas to provide demonstrable improvements in the quantity and quality of play space.
Climate Action Lewisham	2	CI 03	Closely linked into our comments on transport (below), we support the policy C13D (p.339) explained on page 341, point 9.17 that 'incidental' play spaces should be included in large-scale public realm developments. The net losers in car-dependent development are children, and this point, while marginal and seemingly incidental to the main thrust of the chapter, if implemented well will put children's culture, development, enjoyment and safety at the heart of urban development. In a borough with a high proportion of very young people, this can only be a positive promise for the future.	Support noted.	No change.
London Wildlife Trust	2	CI 03	We welcome and support this policy, and it encouragement to deliver natural play, as set out in supporting para 9.15.	Support noted.	No change.
NHS (HUDU)	2	CI 03	**C13 Play and informal recreation** The focus of this policy is on younger children, however, there is a shortage of affordable formal and informal affordable recreation for young people	Noted.	No change.
Telegraph Hill Society	2	CI 03	Amenity space should be provided with sufficient sunlight. Current planning legislation permits high-rise developments to overshadow public open space such that 50% of an outdoor amenity space need only have a minimum of two hours direct sunlight a day at the equinoxes. This is clearly insufficient for public health purposes given the known benefit of sunlight exposure (the more so for those with BAME ethnic origins). We believe the Council should expressly require more stringent provisions, committing to a minimum of six hours direct sunlight at the equinox for parks, playgrounds and other amenity space.	The current BRE legislation is the accepted and adopted minimum measure. However throughout negotiations with developers the Council is insisting that schemes go over and above this threshold.	No change.
The St John's Society	2	CI 03	Possibility for 'play streets' in residential areas. Target to avoid loss does not go far enough. Need to improve and add amenity/open space/play areas locally.	Noted. The Local Plan seeks to respond to the identified deficiency in play space in different parts of the Borough, including the east area. Policy CI3 sets out specific requirements for new development to provide play space, and address deficiencies, however it is acknowledged that the requirements could be strengthened. Whilst acknowledging that play streets in residential areas could be supported by the Council, this is not something that can be addressed by planning policy, and would need to be dealt with separately. The plan does seek to provide	Local Plan policy CI03 amended with additional requirement for development within play space deficiency areas to provide demonstrable improvements in the quantity

				for informal play within public realm, such as public squares.	and quality of play space.
Blackheath Society no 2	2	CI 04	**CI4 Nurseries & childcare facilities.** We support the policy. The Childcare Sufficiency Assessment (2016) should be updated soon given rapidly changing population as a result of many new developments.	Support noted.	No change.
Blackheath Society no 2	2	CI 05	**CI5 Burial space**. Support policy.	Support noted.	No change.
London Wildlife Trust	2	CI 05	We support this policy. We suggest that reference is made to the existing burial sites in Lewisham also being afforded other designations (e.g. Brockley and Ladywell, Site of Importance for Nature Conservation).	Noted.	Burial space policy amended with additional criterion on open space and biodiversity.
Lee Forum	2	CI 13 GR	If green space covers 20% of the borough and London is to be 50% green by 2050 there is a long way to go in greening space. If spare land is to be used for housing then the public realm has got to be seriously greened. Greening and play space for children to promote active lives should have a much higher priority and be mandated in larger developments rather than just promoted.	Noted. The draft Local Plan Part 2 section on Green infrastructure includes policies which promote and require the integration of urban greening measures.	No change.
	2	EC	The Draft Plan sets out a hierarchy of various protected employment areas but also identifies current employment sites which could go or reduce and effectively become 'mixed use' aka housing. There is a welcome emphasis on the creative industries but there is very little clarity on what type of spaces the different types of users might need for example a graphic designer will need a very different space to a sculptor making pieces out of metal and using welding or a film set builder. There is mention of servicing and a general nod to needing a variety of types of spaces but we were left with very little understanding of just what type of employment there is in the borough at the moment, what kind of jobs do the residents of the borough currently do and do they work in the borough or do they travel elsewhere, where do people travel from who work in the borough. What kind of work will people be doing in the future and where will they be doing it? How has Brexit and more importantly Covid changed our work and where we work. If more home working is going to be the norm should we ensure that all new residential units are big enough for a home office. Or get large housing sites to provide a work hub with super fast broadband where people can rent desk space and get out of the house, but it's still close to home. It could be allied to the click and collect hub, a cycle and car hire site etc. and provide an integrated facility for the new community, especially where a site needs a new health centre or school.	Noted. The preparation of the draft Local Plan has been informed by an Employment Land Study. This provides an overview of the local labour market and also sets out future needs for employment land and floorspace, which the local plan makes provision for. Overall, Lewisham's current and future needs are for light industrial / office-type workspace in the B1 Use Class. The plan seeks to enable and gives priority to the delivery of workspace in this Use Class, whilst providing flexibility for a wide range of development typologies to come forward which can accommodate such uses. General industrial uses in the B2 and B8 Use Classes are promoted in Strategic Industrial Locations, in line with the London Plan. Recognising the acceleration in home working and Lewisham's strength in creative and digital industries, the plan includes policies to secure the delivery of modern and reliable digital infrastructure across the Borough.	No change.

	2	EC	If there is going to be more online shopping and home deliveries should there be a move to provide consolidation sites/ van sites/ click and collect stations.	Noted. This matter is addressed in the draft Local Plan Part 2 – Transport policies, which set out requirements for deliveries and servicing. However it is acknowledged the plan could benefit from additional details on this matter.	Local Plan amended to provide further detail on logistics/deliveries and appropriate locations for such uses.
	2	EC	In looking at proposed mixed use schemes which inevitably include shops which usually don't get filled or 'artists' studios which are the wrong design and layout then strengthen your policies about how these units are designed, provided and managed and affordability, but also design for flexibility, e.g. set the block back from the pavement so that if they end up as residential later they have the possibility of defensible space outside the units. The space can be used for bike parking, planters, landscaping, forecourt uses in the meantime.	Noted. The draft Local Plan Part 2 – Economy and Culture policies set out requirements for the design of business space. These seek to ensure that all new workspace is flexibly designed, so that it can accommodate a wide range of employment uses and end-users. This will help to ensure the viability of workspace and encourage take-up.	No change.
Brockley Society	2	EC	**Small clusters of shops** are ignored in the draft plan when they are not part of Town Centres or other designations. Residents being able to shop within 15 minutes' walk requires better protection of these shops. "MidTown Brockley" (Brockley Road, between Wickham Road and Adelaide Avenue) is one example. The several sections of Lewisham Way and western Brookbank Road are others.	Disagree. The Local Plan includes policies to help protect non-designated shopping parades, corner shops and other service points. It is recognised however that permitted Development rights limit the scope for the Council to prevent against the change or use or loss of certain types of commercial premises.	No change.
Culverley Green Residents Association	2	EC	**Employment** The Draft Plan sets out a hierarchy of various protected employment areas but also identifies current employment sites which could go or reduce and effectively become 'mixed use' aka housing. There is a welcome emphasis on the creative industries but there is very little clarity on what type of spaces the different types of users might need for example a graphic designer will need a very different space to a sculptor making pieces out of metal and using welding or a film set builder. There is mention of servicing and a general nod to needing a variety of types of spaces but we were left with very little understanding of just what type of employment there is in the borough at the moment, what kind of jobs do the residents of the borough currently do and do they work in the borough or do they travel elsewhere, where do people travel from who work in the borough. What kind of work will people be doing in the future and where will they be doing it? How has Brexit and more importantly Covid changed our work and where we work. If more home working is going to be the norm should we ensure that all new residential units are big enough for a home office. Or get large housing sites to provide a work hub with super fast broadband where people can rent desk space and get out of the house, but it's still close to home. It could be allied to the click and collect hub, a cycle and car hire site etc. and provide an integrated facility for the new community, especially where a site needs a new health centre or school.	Noted. The preparation of the draft Local Plan has been informed by an Employment Land Study. This provides an overview of the local labour market and also sets out future needs for employment land and floorspace, which the local plan makes provision for. Overall, Lewisham's current and future needs are for light industrial / office-type workspace in the B1 Use Class. The plan seeks to enable and gives priority to the delivery of workspace in this Use Class, whilst providing flexibility for a wide range of development typologies to come forward which can accommodate such uses. General industrial uses in the B2 and B8 Use Classes are promoted in Strategic Industrial Locations, in line with the London Plan. Recognising the acceleration in home working and Lewisham's strength in creative and digital industries, the plan includes policies to secure the delivery of modern and reliable digital infrastructure across the Borough.	No change.

Culverley Green Residents Association	2	EC	If there is going to be more online shopping and home deliveries should there be a move to provide consolidation sites/ van sites/ click and collect stations.	Noted. This matter is addressed in the draft Local Plan Part 2 – Transport policies, which set out requirements for deliveries and servicing. However it is acknowledged the plan could benefit from additional details on this matter.	Local Plan amended to provide further detail on logistics / deliveries and appropriate locations for such uses.
Culverley Green Residents Association	2	EC	In looking at proposed mixed use schemes which inevitably include shops which usually don't get filled or 'artists' studios which are the wrong design and layout then strengthen your policies about how these units are designed, provided and managed and affordability, but also design for flexibility, e.g. set the block back from the pavement so that if they end up as residential later they have the possibility of defensible space outside the units. The space can be used for bike parking, planters, landscaping, forecourt uses in the meantime.	Noted. The draft Local Plan sets Part 2 – Economy and Culture policies set out requirements for the design of business space. These seek to ensure that all new workspace is flexibly designed, so that it can accommodate a wide range of employment uses and end-users. This will help to ensure the viability of workspace and encourage take-up.	No change.
Culverley Green Residents Association	2	EC	Whilst the hierarchy of spaces/ areas for employment is well set out there seems to be no positive policies to ensure they remain and are not diminished by the current permitted development rights which allow for offices/ warehouses etc. to be turned into residential without needing planning permission. Research has been done by the RTPI, POS and others on the impact of these changes of use and it is only belatedly that the government has said that each unit should have a window!! Many of these projects have been done by 'developers' producing tiny units for rent which have ended up being occupied by families who are homeless and been placed there by Local Authorities. The impacts that this has had on Harlow has been well documented, but there are other examples of conversions of offices in the middle of industrial estates where families are trying to live amongst noise pollution and huge lorries on roads with inadequate pavements and lighting. I would have expected a serious analysis of just how much employment space the Borough thinks it needs, of what type, where located and how it will be protected, i.e. article 4 directions so that enough space, even if flexible space is protected into the future	Noted. Permitted Development rights are outside the scope of the Local Plan. The Council may in the future consider the introduction of Article 4 Directions, for example, to remove permitted development rights for the change of use of business uses to housing. The draft Local Plan sets out future requirements for employment floorspace over the plan period, informed by an Employment Land Study,	No change.
Culverley Green Residents Association	2	EC	**Retail** The plan proposed the alteration of most of the current town centre boundaries, the removal of secondary shopping frontages, identifies Lewisham Town centre as aspiring to be a Metropolitan Centre and Catford as a Major Centre. The latter seems a bit weird but can only be because the Town Hall and Council offices are located there and cannot be anything to do with its shopping offer which is poor.	Noted. The designations of Catford and Lewisham as major town centres are established by the London Plan. The Local Plan makes a limited number of changes to the boundaries of some town centres. It also removes secondary frontages and establishes Primary Shopping Areas, consistent with the NPPF. These changes will allow for greater flexibility in the range of uses that can locate within town centres, and help to support their long-term vitality and viability.	No change.

Culverley Green Residents Association	2	EC	The plan also fails to discuss properly what the effect of Covid, the resultant retail closures and the acceleration of online shopping might have on our shopping streets never mind the government's move to allow businesses to change uses within a wider use class designation or to change to residential without needing planning permission. I would have expected some kind of analysis of what all these impacts might be and what proposals and policies might be brought forward to protect core shopping frontages, enhance the shopping experience and actively promote other people draw attractions	Noted. Following the Regulation 18 consultation, a new retail and town centres study has been undertaken. This provides updated town centre health checks and also considers new data, including on the impacts of Covid-19, online shopping trends and new Permitted Development rights. The study and its recommendations have been used to inform the local plan.	Local Plan amended to identify and take account of updated town centre floorspace requirements, in line with latest Retail Impact Assessment and Town Centre Trends study.
Greater London Authority	2	EC	**Town Centres and offices** Lewisham and Catford are designated as Major Town Centres with Lewisham also having future potential for Metropolitan Town Centre status (London Plan Table A1.1). The Local Plan seeks to support the envisaged transformation in a sustainable way highlighting improvements to accessibility and public realm as well as Site Allocations supporting significant levels of growth. Beyond quantitative aspects, it will be important to promote a broad mix of diverse uses. The next review of the Town Centre Network will re-consider the status of Lewisham Town Centre. The recent Use Class Order changes and in particular the new Use Class E should be reflected in the town centre policies.	Noted. The draft Local Plan is considered to provide sufficient flexibility for a wide range of uses to locate within town centres to support their long-term vitality and viability, whilst ensuring future floorspace requirements can be accommodated. The Local Plan aligns with the London Plan designations for Lewisham and Catford major centres, and also reflect the potential scope for Lewisham to be designated as a metropolitan centre in the future.	Local Plan amended to reflect and respond changes to the Use Class Order, including the new Class E.
Greater London Authority	2	EC	**Industrial land** The council's evidence base (Local Economic Assessment/Employment Land Study) demonstrates a strong demand for space, which is also illustrated by low vacancy rates and increasing rent levels. The Mayor welcomes the commitment to retaining industrial capacity within Strategic Industrial Location (SIL) and Locally Significant Industrial Sites (LSIS) (Policy EC2(B)). The draft Plan also states that there is no further scope for the loss of industrial land and that the protection and intensification of existing sites should be pursued (para 2.17). Please note that Figure 15.2 wrongly shows designated SIL as LSIL. The Local Plan should identify, coordinate, and transparently set out the overall land and floorspace requirements as well as provision of an appropriate mix of industrial uses that meets the need for all industrial functions, particularly within Use Class B8. More focus on B8 within SIL / LSIS may also be appropriate, given that the new Use Class E could potentially erode former B1(c) uses within SIL / LSIS designations.	Support for overall approach to safeguard industrial capacity of SIL and LSIS noted. The Local Plan has been informed by a robust evidence base, including Employment Land Review, the New Cross Area Framework, and A21 Development Framework. Drawing on these studies it has identified land which is considered suitable for industrial intensification and where there is deliverable. Many of the opportunities are within LSIS, and require mixed-use typologies to cross-subsidise and enable intensification to be delivered. This approach has been broadly supported by landowners of identified sites. Further details are included in relevant site allocation policies. The Local Plan takes forward a plan-led approach to co-location of industrial and other uses in selected LSIS. Class E (g) uses (former B1c) are given in principle support in these locations, which is in response to the Council's Employment Land Study, which identifies future floorspace needs are mainly for this type of use. The site allocation policies make clear that any redevelopment of LSIS must be employment-	Local Plan figure 15.2 amended to appropriately show SIL and LSIS sites Local Plan amended to provide further details on CAZ and how Lewisham will support its function. Local Plan amended to provide more clarity around acceptability of B8 uses within

			The importance of the borough's Central Service Area uses should be explicitly recognised by identifying and protecting or relocating them, so that they can continue to serve the important functions for the CAZ, including sustainable 'last mile' distribution/logistics, 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions in line with para 6.4.7 of the London Plan. Industrial floorspace capacity across designated SIL and LSIS should be intensified where there are opportunities to do so in accordance with London Plan Policy E7. Further details should be provided identifying if, where and how this approach could be taken forward and supported by up-to-date local evidence. Lewisham's New Cross Gate Area Framework (2019) set out industrial intensification opportunities for example at Juno Way and Mercury Way (within SIL). However, the nature of the intensification and associated floorspace figures are unclear, and the Mayor is concerned that the promotion in these particular areas of creative uses, yard space and liveable neighbourhoods would shift the focus towards former B1(c)-type industrial uses.	led, not result in the loss of industrial capacity and deliver net gains wherever possible. The draft Local Plan also includes new policies around the use of planning conditions to ensure that Class E uses are secured over the long-term, and are therefore not eroded through changes of use.	SIL and elsewhere. Local Plan amended to include additional policies on the use of planning conditions to ensure that new Class E(g) uses delivered are secured over the long term, and not lost through changes of use to other Class E uses.
Greater London Authority	2	EC	The Mayor has published guidance to support his industrial land policies and suggests the borough should consider how it can be reflected in the next iteration of the Plan: practice note on industrial intensification and co-location through plan-led and masterplan approaches.	Noted. This guidance has been considered and used to inform the preparation of the Regulation 19 stage local plan.	Local Plan amended to signpost Mayoral guidance in supporting text (co-location policies) to assist with policy implementation.
Lee Forum	2	EC	Lewisham already has a low level of local employment and acts primarily as a dormitory borough for employment elsewhere in London. Increased housing will add to this dormitory nature unless specific policies encourage a growth in local employment opportunities. Employment closer to home will support reductions in car commuting and local retail and leisure.	Noted. The draft Local Plan recognises that Lewisham has a characteristically inward looking and small local economy when compared to many other London boroughs. It therefore sets a framework to help grow the local economy and ensure all residents have access to good quality education, training and job opportunities. The plan seeks to deliver new and modern workspace, with a clear strategy to achieve net gains in overall employment floorspace provision. The local plan also introduces new approaches to support the long-term vitality and viability of town centres.	No change.
Lee Forum	2	EC	Cultural facilities need to be dispersed not concentrated. For example Lewisham's own adult education facilities can be hard to reach using public transport from many parts of the borough and for many residents can only be accessed by car journeys.	Noted. The Local Plan seeks to support and grow the local economy by building on the Borough's strength in the cultural and creative industries. As part of this approach, the plan seeks to establish a critical mass of complementary cultural/commercial activities in specific areas, including the Creative Enterprise Zone and Cultural Quarters. The plan does not preclude cultural facilities from being developed	No change.

				or operating elsewhere in the Borough. For example, the Part 2 town centre policies support cultural uses in town centres throughout Lewisham.	
Lewisham Liberal Democrats	2	EC	2. Catford is on track to lose all its supermarkets and many other shops. The Local Plan must include credible proposals to attract businesses back	Disagree. The draft Local Plan sets a framework to enable the comprehensive regeneration of Catford town centre in order to support its long term vitality and viability. The draft Local Plan proposals will enable the re-provision and renewal of a significant amount of commercial floorspace, including retail units, where sites come forward for mixed-use redevelopment.	No change.
London Borough of Bromley	2	EC	The three objectives of protecting business space, revitalising town centres, and providing affordable workspace are supported. The employment land hierarchy is consistent with Bromley's and the cumulative losses experienced are reflective of Bromley's own position. The site allocation policies for SIL land, including the accommodation of intensification and co-location, are noted. The expectation of development to retain and increase industrial floorspace is also broadly supported.	Support noted.	No change.
London Borough of Bromley	2	EC	The Town Centre policies and hierarchy are generally supported. With regards to the potential new opportunity area and town centre at Bell Green and Lower Sydenham, we would welcome further discussions on any retail impact assessment or similar work to ensure that impacts on relevant centres in Bromley are properly assessed.	Support noted. Following the Regulation 18 stage consultation, a new retail study was undertaken. This included a retail impact assessment of a new town centre at Bell Green. LB Bromley were invited to review the part of the project specification concerning the retail impact assessment and have provided feedback to ensure relevant centres within Bromley were considered in the assessment. The Council will continue to work with Bromley on strategic planning matters through the Duty to Cooperate.	Local Plan amended to clarify that Bell Green / Lower Sydenham has scope to be designated a future local centre. This takes into account findings of the impact assessment.
London Borough of Southwark	2	EC	Southwark notes the need to continue to work together on the preparation and implementation of strategic planning frameworks for the Old Kent Road, Canada Water, and New Cross/Lewisham/Catford Opportunity Areas, in the LB Southwark and LB Lewisham respectively and to continue working in cooperation on strategic economic matters, such as industrial land management, including by investigating opportunities for the consolidation and intensification of land and sites at and around Surrey Canal Road Strategic Industrial Location (SIL), to deliver net increases in workspace.	Noted. The Council will continue to work with Southwark on strategic planning matters through the Duty to Cooperate.	No change.
Make Lee Green	2	EC	**A Post-Pandemic World** The world has changed dramatically since the draft of the Lewisham Plan was put together. Many of the starting assumptions will no longer be valid. More people are working at home, which means less travelling and more local shopping but also more on-line shopping. Residents will be spending more time and more money in their local communities. People in Lewisham have been driving less and walking and cycling more.	Noted. The NPPF requires that the local plan addresses identified needs for retail floorspace for a minimum 10-year period. A new retail and town centres study has been prepared. This takes into account future needs in the borough taking into account the latest available information, including impacts of Covid-19 and trends in online shopping. The Local Plan is considered to provide sufficient flexibility for a wide range of uses to locate within town centres to support their long-term vitality and	Local Plan amended to identify and take account of updated town centre floorspace requirements, in line with latest Retail Impact

			There is an oversupply of retail space, a situation that has been exacerbated by the pandemic. The future is fewer, but more impactful stores. Online retail sales now accounts for approximately 33% of total retail sales (a decade ago it was ~5-10% and pre-COVID it hit 20%). For many, habits learned during lockdown will become entrenched which will put further pressure on our retail stores to, quite simply, evolve or die. This is an once-in-a-lifetime opportunity to redefine our high streets to become more digitally connected and people-friendly. We need to invest in our public spaces to give shoppers a genuine reason to ditch their screens, ensuring retailers remain relevant in a fast changing world. It provides an opportunity to rethink how we reorganise our shopping streets. The “15 minute city” concept is being embraced by politicians and planners to radically reshape urban environments for the benefit of the people who live there. The “predict and provide” approach that underpins much of the thinking behind the Plan is no longer tenable. The Council can shape demand for infrastructure and service and local leader can and must take an active role in delivering change.	viability, whilst ensuring future floorspace requirements can be accommodated.	Assessment and Town Centre Trends study.
Make Lee Green	2	EC	Commercial developments should have mandatory space for community focused and not for profit organisations. Priority should be given co-operatives and environmentally-focused organisations.	Noted. The Council cannot control the types of businesses or organisations that take up space within employment locations, provided the activities/land-uses are in accordance with the local plan. The draft Local Plan introduces new policies to help secure the delivery of affordable and lower-cost workspace to assist businesses or organisations for which rental rates are an issue.	No change.
Telegraph Hill Society	2	EC	Paragraphs in this section of the draft Plan are no longer numbered. This needs correcting.	Noted. This is an editorial error that will be rectified.	Local Plan amended to include paragraph numbering for Part 2 Economy and Culture section.
London Borough of Tower Hamlets	2	EC	The proposed approach to protection of employment land is welcomed, particularly the designation of new mixed-use sites that are currently underutilised. We would however warn against the prioritisation of large employment sites over smaller, more localised and accessible sites. This will protect against and overreliance on private cars for transport and ensure that space is not wasted on car parking where it could be used for a greater purpose, or to support small businesses. The proposed focus on retention and protection of Industrial sites (SIL and LSIS) is considered to be an important aspect of	Noted. The draft Local Plan sets out a hierarchy of employment land which will be safeguarded to meet identified need. This land includes a wide range of employment site typologies, both in terms of strategic significance and function.	Local Plan amended to provide more detail around employment land and Lewisham’s role in the sub-regional economy,

			the employment land policy and is something that Tower Hamlets welcomes, as Industrial sites in Tower Hamlets have been encroached upon by other land uses the availability of last mile and logistics sites presents an issue for the borough and a greater issue for general logistics across London.		including logistics.
Blackheath Society no 2	2	EC 01	**EC1 A thriving and inclusive local economy**. We are surprised at big emphasis on Cultural and creative industries, which seem to be concentrated in Deptford and New Cross (North Area) and Forest Hill (South Area). Little background and quantitative context (e.g. proportion or value of Lewisham's economy/workforce) given in Explanation. While we welcome support for these industries, we believe the Borough needs to develop a mixed and balanced economy to meet the needs of its existing population. It should avoid taking a parochial approach to employment, though lower travel-to-work time helps improve quality of life and lower pollution.	Noted. The draft Local Plan policies have been informed by evidence base documents, including the Lewisham Employment Land Study and Local Economic Assessment, which indicate a significant critical mass and growth potential in the creative and digital industries. The Employment Land Study also indicates the borough's future needs are primarily for office/light industrial uses. Whilst recognising this is a focus for the plan in selected areas, this will not preclude the development of other employment sectors elsewhere. Indeed, the Local Plan seeks to safeguard employment land and facilitate provision for a wide range of sectors and uses.	No change.
Climate Action Lewisham	2	EC 01	**Economy and culture** Policy EC1 (p. 247) outlines the roadmap to a "Thriving and inclusive local economy" but the plan is missing an obvious and important opportunity to create employment and apprenticeships for green jobs. Policy EC9 B (P. 277) states the need for local developments to offer local apprenticeships but has no target or quota for green industry opportunities. The Local Plan must feature green job opportunities as central to development across the borough. Green employment opportunities should not be limited to building and trade but extend to civic life and the service industries as well as a whole range of other possibilities such as city farming, communal composting and environmental education. The intention to revitalise the arts sectors and night culture will necessitate additional infrastructure – this is an opportunity to create green jobs for example in regenerative waste management and sustainable procurement.	Noted. The draft Local Plan is considered to provide sufficient flexibility to support a wide range of industries and commercial activities in the borough, including the green industries. However it is not considered appropriate to set quotas or targets for specific sectors. This is because the Council cannot control the types of businesses that take up space within employment locations, provided the activities/land-uses are in accordance with the local plan.	Local Plan policy EC1 amended to signpost support for green industries, as well as in the Strategic Objectives for the plan.
Deptford Society	2	EC 01 EC 02	**Page 247** Policy EC1 'A thriving and inclusive local economy' and **Page 251** Policy EC2 'Protecting employment sites and delivering new workspace' are heavily focused on the cultural and creative sectors, and the CEZ of North Deptford. These policies could do more to support and strengthen this sector, which directly contributes to the creation of lively and 'thriving' neighbourhoods. The activity of artists in the area underpins the growth of the creative sector and the cultural draw of the CEZ, this should be protected and care taken to prevent damage or loss of the existing, remaining community of artists and makers in Deptford Creek and surroundings. The type of workspaces required to support a CEZ is varied and should go beyond the desk space supplied by developers providing workspace, and seek to meet the needs of the spatial and design requirements of different creative sectors.	Noted. The draft Local Plan – Part 3 includes additional policies for the Lewisham North Creative Enterprise Zone (CEZ) covering Deptford, which build on the Part 2 policies. These provide protection for, and seek to prevent the loss of, workspace/uses in the creative industries, including artists' studio space.	No change.
Theatres Trust	2	EC 01	Policy EC1: A thriving and inclusive local economy	Support noted.	No change.

			This policy recognises the value to Lewisham of its cultural facilities and supports provision of new facilities and the temporary use of spaces. Part B.a is welcomed in particular as it clearly states that existing uses and venues should be retained. This is important in helping to preserve the uses which are important to local people, protect the wider ecosystem of London's renowned cultural offer and to ensure the diversity and success of the borough's town centres.		
Blackheath Society no 2	2	EC 02	**EC2 Protecting employment sites and delivering new workspace**. We are concerned by the recent decision at Blackheath Hill LSIS that prioritised increasing commercial/ industrial floorspace and new housing at the expense of the amenity of existing adjacent residential accommodation, in terms of daylight and trees.	Noted. Decisions on previous planning applications are outside the scope of the local plan.	No change.
Greater London Authority	2	EC 02	Further details about the compensatory re-provision of SIL at the Bermondsey Dive Under site and potential floorspace capacity - beyond the 2019 Masterplan jointly with Southwark - are also required. The site has significant physical and potential viability constraints, and without a specific Site Allocation promoting what could be delivered in terms of high-quality industrial land (rather than other employment uses such as offices), there appears to be insufficient commitment towards its realisation, which would be of concern, in particular as the scope for industrial intensification is considered to be limited. Informal recent discussions with Lewisham officers indicate the likely introduction of a Site Allocation for this site.	Noted. The New Bermondsey Dive Under Study (2019) demonstrates that employment-led development can feasibly be delivered at this site. A site allocation is included in the Regulation 19 local plan to provide further clarification around its future use.	Local Plan amended to include a new site allocation for the Bermondsey Dive Under site.
Greater London Authority	2	EC 02	It should be made clear – also in Local Plan Policy EC2 - that co-location is only acceptable in those areas that are not designated as, or that are released from, SIL, such as the Site Allocations within the Surrey Canal SIL. London Plan Policy E7(B) is clear that within SIL there is no scope for co-locating industrial uses with residential and other uses.	Noted. Local Plan will be amended to ensure conformity with the London Plan.	Local Plan amended to clarify that co-location is not appropriate within SIL, in accordance with the London Plan.
on behalf of Sydenham Scheme LLP the owners of the Coventry Scaffold	2	EC 02	Policy EC2 criterion B part 'a' refers to no net loss of industrial capacity which is the same test identified in the New London Plan. It then goes on to reference in brackets about ensuring no net loss of floorspace and operational yard space. These tests were removed from the New London Plan shortly before it was adapted at the request of Central Government on the basis they are too onerous and greater flexibility is required to facilitate new homes. This criteria should be amended accordingly by removing the text in brackets. The same criterion refers to 'intensifying employment development' and this should be clarified to refer to densities rather than development so that the test relates to jobs rather than the other tests now removed from the New London Plan. The second paragraph at page 254 should also come I line with this with the aspiration that 'net gains are delivered wherever possible' being judged on job number rather than a floorspace	Noted. Supporting text will be amended to ensure conformity with the London Plan.	Local Plan amended to remove references to floorspace and operational yard space in terms of applying industrial capacity considerations.

			or site area basis. Same point for fourth paragraph of page 265 and the second paragraph of page 266.		
South East London Labour for a Green New Deal	2	EC 02	The plan should also support the development of green jobs and apprenticeships in energy, recycling and areas such as Local Authority managed social care offering fair wages and conditions.	Noted. The draft Local Plan policies are not considered to preclude the development of green industries locally, however it is acknowledged that the plan could signpost support for and promote these. Wages and working conditions are outside the scope of the Local Plan.	Local Plan strategic objectives amended to include support for green industries.
South East London Labour for a Green New Deal	2	EC 02	There are 40 jobs for every 100 workers resident in the borough, which is the 2nd lowest in London. 90% of London businesses are small. We support the plan's aim for an inclusive economy by steering investment to town centres and other local employment hubs as well as supporting the growth of priority sectors including the cultural, creative and digital industries. As working practices change post Covid we believe it should include office workspaces which will meet health and safety requirements for workers. Many office based staff are increasingly being asked to work from home but do not have appropriate office space there and could be funded by large employers saving on office costs. This shift will reduce commuting and help revitalise town centres.	Support noted. The draft Local Plan broadly supports the provision of new modern workspace in town centres. It also includes policies for the design of new workspace to ensure this is of a high quality standard. However, health and safety provisions for workers will normally be covered separately by Building Regulations and other legislation.	No change.
Telegraph Hill Society	2	EC 02	The area around New Cross and New Cross Gate has lost a considerable amount of light industrial and other workspace in recent years, which is unfortunate considering the level of creative industries which could potentially surround Goldsmiths. (Reference to this is made on **page 262**.) The area currently around New Cross Gate station could be re-designated as a Mixed-use Employment Location (MEL) to redress this loss. We note that this site is included within the designated District Town Centre of New Cross (**table 8.2**) and Policy **EC12.A** adopts a "*town centres first*" approach to considering the location of retail, commercial, leisure and cultural uses. This definition could encompass workshops for creative industries and shared workspace accommodation for smaller businesses, which would be appropriate to the area, although not larger industrial employment which would not.	Noted. The Local Plan evidence base acknowledges that Lewisham continues to experience notable losses of commercial and industrial floorspace. The Local Plan therefore includes a refreshed suite of policies which are intended to safeguard, offer stronger protection for and increase industrial capacity. There are a number of proposals to enhance employment provision in the North sub-area. The site allocation for Hatcham Works will enable to provision of new commercial development as part of a mixed-use development; however given its town centre location it is considered that main town centre uses are most appropriate.	No change.
London Borough of Bromley	2	EC 05	The draft Lewisham Local Plan permits net loss of employment floorspace where lack of feasibility of a development can be demonstrated (EC5(d)) and the use is ancillary and complementary. Whilst this would only be permitted in exceptional circumstances and where the function of the LSIS and delivery of strategic requirements for employment floorspace are not undermined, any reductions in floorspace could undermine Bromley LSIS areas near to Lewisham such as Lower Sydenham and therefore any impacts across boundaries (such as agglomeration benefits) should be considered in such cases.	Noted. The policy supporting text will be amended to address this matter.	Local Plan amended with supporting text to state that consideration should be given to impact on function of employment areas both within and outside the borough.

on behalf of Sydenham Scheme LLP the owners of the Coventry Scaffold	2	EC 05	Policy EC5 lists Stanton Square as a LSIS suitable for co-location. Criterion E however effectively removes the option for residential to be co-located if there is not a 'approved site-wide masterplan' in place. Page 266 expands to say this must be an approved or agreed masterplan by the Council. It is not clear whether site-wide means across the whole LSIS or the development site in question. It is understandable that in bringing forward a specific proposal that it is considered with an illustrative masterplan for the rest of the LSIS to ensure later phases can come forward in an appropriate way but it is not reasonable to insist the Council have approved or agreed (which is taken to mean formally sanction) a masterplan for development on site's outside the developers control. It is understood that the Council is preparing a wider masterplan for the Bell Lane regeneration area and this is welcome but there should not be an absolute policy requirement for this to be approved. Elsewhere in London common practice is an illustrative masterplan worked up by the developer in consultation with the Council in parallel to the design evolution as part of the design rationale for the site. We therefore request the absolute requirement for any masterplan to be 'approved' or 'agreed' should be removed from the policy and supporting text.	Noted	Wording changed to a site-wide masterplan that the council find acceptable and supports the future delivery of adjoining sites
Thames Water Utilities Ltd (Property)	2	EC 06	Earl Pumping Station is located to the south of Surrey Quays on the corner of Chilton Grove and Yeoman Street. It is a working pumping station that dates from the 1940s. Earl Pumping Station falls within the Plough Way Mixed-Use Employment Location in the emerging Local Plan. Mixed-Use Employment Locations (MELs) were first designated in the 2011 Core Strategy. They consist of "older, poorer quality and redundant industrial land, buildings and uses that were often incompatible with their neighbouring residential areas." In short, the Core Strategy policy required new development in MELs to deliver 20% of new built floorspace as employment floorspace. QD.7 of the 'Proposed Changes to the adopted Policies Map' confirms that the boundaries of the Plough Way MEL remain as identified within the 2011 Core Strategy. The proposed Local Plan Policy (EC6) supports comprehensive redevelopment of MELs. Development proposals must be delivered in accordance with a site-wide masterplan. There is no longer a 20% built floorspace requirement. Instead, development proposals will be required to "maximize the amount of Class B1 employment floorspace through site redevelopment, along with providing a demonstrable and significant uplift in the number of jobs."	Noted. The draft Local Plan does not preclude the future redevelopment of the Earl Pumping Station in the Plough Way MEL. Should a planning application come forward in the future, the applicant would be required to clearly demonstrate that the loss or rationalisation or water infrastructure would not have an adverse impact on provision in the local area, having regard to the Infrastructure Delivery Plan, and that land uses are in accordance with the masterplan for the MEL.	No change

			However, the Local Plan supporting text states that the comprehensive mixed-use redevelopment of Plough Way has been realized. In the case of Plough Way, it seems that the MEL designation is only retained to ensure that the employment provision on sites be maintained. Comments on Local Plan Earl Pumping Station is a brownfield site within a sustainable location. Once the Tideway works are complete and operational, Thames Water will consider whether there is any potential for development of the site. It is possible that some form of development can be accommodated within the site, which might take the form of residential development on surplus land (provided Thames Water's operational and access requirements can all be accommodated, and its asset protection will be the paramount importance before considering additional development on the site). For example, planning application DC/13/085909 sought permission for 35 residential units and 221 sq m of commercial floorspace on part of what is now the TTT site. This proposed layout could not be implemented now (because it would need to be amended to incorporate the TTT access requirements) but it gives an indication as to the type of development that might be achievable and the contribution that redevelopment could make to the MEL. Most of the Plough Way MEL has now been redeveloped and Policy EC6 is predominately in place to protect the employment uses that have been generated by redevelopment. There is no mention of the Earl Pumping Station, which falls within the MEL. There is no real traditional employment use on the Earl Pumping Station site that would require retention but clearly jobs are provided and enhanced by the development of the water infrastructure. Therefore the site could be realised as a sustainable residential-led development. We request that a sentence is added to the supporting text relating to Policy EC6 that Earl Pumping Station within the Plough Way MEL may be considered for development in the future and this will be considered on its own merits, noting that the water infrastructure development is of strategic importance to the area and the whole of the Tideway project, and that development on any surplus land could successfully contribute to the residential-led mix of uses within the area.		
	2	EC 09	Investment in Green jobs and apprenticeships. If Lewisham is to have a "A thriving local economy that tackles inequalities" then local people need to be trained in jobs for the future. Government funding should be taken advantage of to achieve this and industries beyond energy and construction	Noted. The draft Local Plan seeks ensure appropriate provision for education and training, and requires new major development to provide local training and apprenticeship opportunities.	No change.

			must also be considered such as city farming, communal composting and environmental education.	The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including education facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure. Where Government funding is available, the Council will seek to direct funds to support the delivery of the Local Plan.	
	2	EC 10	I really support the move to make catford and Lewisham evening destinations. It seems like small parades of shops in Brockley, Honor oak and Crofton part are doing ok but the decline of traditional shopping areas in Lewisham and Catford needs to be reversed.	Support noted.	No change.
Blackheath Society no 2	2	EC 10	We strongly support the aspiration to protect and revitalise Lewisham's industrial areas and secure high quality and affordable workspace, both to strengthen the local economy and to create more local employment opportunities. However, we feel the Plan also needs to recognise explicitly that, at least since the 1980s, Lewisham has been a dormitory borough for its many residents who work in central London (and increasingly in other London boroughs), supported by a historically radial but increasingly web-like transport infrastructure. The Council has very limited capacity, ability or indeed expertise to shape the future local economy. It should recognise that though it has a duty do what it can in this regard, it must also do what it can to improve the lives of the many who choose to make their homes in Lewisham - because of its characterful neighbourhoods and proximity to the attractions of central London – but work outside the Borough, valuing its good transport links to other parts of the wider city and more varied job opportunities. The Plan should recognise not only those who live and work or study in Lewisham, but also those who live here but work or study elsewhere. They still bring great benefits into Lewisham, in terms of spending in the local economy, consuming local culture and contributing to the life of vibrant local communities and neighbourhoods. They also rely heavily on its parks, open spaces and leisure facilities. They need to be encouraged to spend more of their time and money locally, to generate more local economic activity and employment. EC10-18 are key to this.	Support noted. The National Planning Policy Framework requires the local plan to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. The draft Local Plan therefore sets an economic strategy which is informed by evidence of need, such as for new workspace and floorspace for town centre uses. The supporting text to draft Local Plan policy EC1 (A thriving an inclusive local economy) acknowledges that many people take up work and training outside of the Borough and therefore reflects on the need for local residents to have good access to public transport – which is a matter largely dealt with by the Part 2 policies on Transport and connectivity.	No change.
Blackheath Society no 2	2	EC 10	**EC10 Town centres at the heart of our communities**. We agree with the thrust of the policy. However, we are concerned at the lack of detail about how it will be pursued; about the lack of emphasis on involving each local community in defining a distinct vision for their town centres; and about the lack of Council resource for delivering the policy e.g. through workshops, town centre managers, business partnerships.	Noted. The draft Local Plan establishes the town centre hierarchy along with policies to manage development within it, taking into account the role and function of a centre. Planning and investment decisions will be made in accordance with the Local Plan, including for individual planning applications. The Council's Economy and Partnerships team will play a role in supporting the delivery	No change.

				of the Local Plan and engaging with local communities, business groups and other key stakeholders.	
Blackheath Society no 2	2	EC 10	**EC10 Town centres at the heart of our communities**. We are not convinced of the case for pursuing Metropolitan status for Lewisham town centre, either in terms of need, practicality or benefit. While the 1970s Lewisham Centre clearly needs a refresh and offers opportunities for redevelopment to meet current and future demands and needs, it is severely physically constrained by major corridor and connecting roads, and cannot hope to compete with existing large established and often more modern town centres within easy reach e.g. Bromley's Glades, Docklands' shopping centre, Stratford's Westfield, West End's Oxford/Regent Street. We feel that a refresh of Lewisham and Catford as effective modern major town centres for the borough is sufficient ambition, beyond which lies significant risk.	Noted. The London Plan indicates that Lewisham major centre has potential scope to be re-designated as a Metropolitan centre in the future. The draft Local Plan has been prepared having regard to the London Plan, and includes a strategy to support its future re-classification.	No change.
Deptford Society	2	EC 10	**Page 279** We wholly support Policy EC10 'Town centres at the heart of our communities', in particular 'Maintaining and enhancing their distinctive features and characteristics where these make a positive contribution to the locality, including their built form, historic and cultural character;' to secure the long-term vitality and viability of Lewisham's town centres. We would welcome a localised high street strategy to ensure future growth and investment within and around Deptford High Street works to support the heritage of the high street as well as strengthening the local economy. A significant amount of Lewisham's housing need is planned to be met through sites local to Deptford High Street. It is important that these new neighbourhoods are supported with good provision of shops, services and community facilities, that are designed and planned for alongside a multi-disciplinary strategy for a vision to strengthen the high street. This will become even more important as the local population increases and more people come to work in the area.	Support noted. The Local Plan provides the strategic framework for managing development in and around Deptford High Street. The Council may in the future prepare further guidance to support implementation of the local plan.	No change.
NHS (HUDU)	2	EC 10	**EC10 Town Centres at the heart of communities** We broadly support this policy however we propose a minor change to clause e) e. Promoting town centres as vibrant places of daytime, evening and night-time economic, *community* cultural and leisure activities. The policies relating to town centre uses as well as other relevant policies will need to be revised to reflect the 2020 Use Classes Order and The Town and Country Planning (General Permitted Development Etc.) (England) (Amendment) Order	Support noted.	Local Plan amended to reflect that community uses are appropriate for town centres. Local Plan amended to reflect and respond to changes to the Use Class Order, including the new Class E.

South East London Labour for a Green New Deal	2	EC 10	The information in the reports is contradictory on whether more or less retail space will be required	Noted. The Retail Capacity Study 2019 provided that additional retail floorspace will be required to meet need over the plan period. Following the Regulation 18 consultation, the Council has commissioned an additional Retail Impact Assessment and Town Centre Trends Report. This suggests that there will be a need for some additional retail floorspace over the long-term, although a lesser amount than previously forecasted.	Local Plan amended to take account of findings of identified needs set out in Retail Impact Assessment and Town Centre Trends Report.
The St John's Society	2	EC 10	ECONOMY & CULTURE Agree with promoting 'Town centres at the heart of our communities' – there should be space for businesses and workplaces within retail zones and town centres.	Support noted.	No change.
	2	EC 11	Whilst the hierarchy of spaces/ areas for employment is well set out there seems to be no positive policies to ensure they remain and are not diminished by the current permitted development rights which allow for offices/ warehouses etc. to be turned into residential without needing planning permission. Research has been done by the RTPI, POS and others on the impact of these changes of use and it is only belatedly that the government has said that each unit should have a window!! Many of these projects have been done by 'developers' producing tiny units for rent which have ended up being occupied by families who are homeless and been placed there by Local Authorities. The impacts that this has had on Harlow has been well documented, but there are other examples of conversions of offices in the middle of industrial estates where families are trying to live amongst noise pollution and huge lorries on roads with inadequate pavements and lighting. I would have expected a serious analysis of just how much employment space the Borough thinks it needs, of what type, where located and how it will be protected, i.e. article 4 directions so that enough space, even if flexible space is protected into the future.	Noted. Permitted Development rights are outside the scope of the Local Plan. The Council is proceeding with an Article 4 Direction to withdraw permitted development rights from Class E uses (commercial retail and services) to Class C3 (residential)	No change.
Blackheath Society no 2	2	EC 11	**EC11 Town centre network hierarchy**. We broadly support the concept of policy and hierarchy set out in Table 8.2 (though this may need to be flexible: it classifies together centres (District and Local) with very different characters, which need to be protected). C As noted above, not convinced that Lewisham town centre needs/ought to aspire to Metropolitan status. It would be helpful and clearer in policy terms if each named location in Table 8.2 could be given a designation of Reinforce, Re-examine/Repair, or Reimagine/Reinvent	Noted. The potential scope for Lewisham town centre to be designated as a Metropolitan Centre is set out in the London Plan, which the Local Plan reflects. Table 8.2 sets out the town centre hierarchy and makes clear the role and function of centres within it. It is not considered that this table should be conflated with outputs of the Lewisham Characterisation Study (e.g. character scope to be reinforced, re-examined, etc.). The Local Plan however does set out policies for managing growth and change within individual centres, particularly in Part 3.	No change.
Deptford Society	2	EC 11	**Page 287** Diagrams label Deptford and Forest Hill as Major Centres rather than District Centres.	Noted.	Keys amended to show Deptford and

					Forest Hill as District Centres
Forest Hill Society	2	EC 11	**Additional Issues** EC11 – Town centre network and hierarchy. The Forest Hill Society recommends that the Primary Shopping Area be extended to include the shops and restaurants of Perry Vale, between the rail station and Waldram Park Road (south circular). This area is the fastest growing economic area in Forest Hill.	A desktop research exercise using a widely recognised methodology informed the boundaries of Primary Shopping Areas. The extent of the Primary Shopping Area was formed around areas containing the greatest concentration of retail shops, the most accessible part of the town centre, natural order in terms of the following typology and avoiding breaks where appropriate and heritage considerations, including shop front design. Perry Vale Road had a low concentration of retail shops and was also the relatively less accessible part of Forest Hill town centre. For these reasons, it was not included in the Primary Shopping Area.	No change.
Hither Green West Campaign Group	2 2 2	EC 11 Table 8.2 EC 15	Local Centre designation for Hither Green Lane We are disappointed at the failure to recognise the essential role Hither Green Lane plays in providing a range of shops and services which meet the day to day needs of Hither Green residents, including places to meet and socialise nearby. It easily meets all the criteria for 'local centre' designation. Given this, and the higher social deprivation in Hither Green West compared to neighbouring areas (including on the East side of the railway line), a 'local centre' designation for Hither Green Lane will facilitate a thriving local economy that tackles inequalities and helps secure long term viability. While all the retail units are currently occupied, the designation would help strengthen Hither Green Lane's vibrancy and assist the retail offer's diversification. The support and investment that comes with the 'local centre' designation would also help support nearby roads with significant commercial offers, such as Springbank Road. There are four parades of shops along Hither Green Lane's length providing essential day-to-day services. Specifically, the section nearest the Coop supermarket consists of circa 27 ground floor retail units. These retail units include the Coop supermarket, several convenience stores, take-away food outlets, several barbers/hairdressers, florists, a launderette, dry cleaners, and two pharmacies (i.e. more units and day-to-day essentials than Staplehurst Road, which has been proposed as a 'local centre'). There is significant health, education, leisure facilities and a park within 250m of the Lane, including Woodlands Health Centre and the two pharmacies; Brindishie Green School, Park nursery and Bright Horizons nurseries. It is very close to Mountsfield Park (a park four times the size of Manor House Gardens and the focus of Lewisham People's Day). It has several community facilities which act as an anchor, including	Noted. In response to Regulation 18 stage consultation feedback, officers have reviewed findings of the Local Centres Topic Paper (2020) with reference to Hither Green Lane. It is considered appropriate to extend the boundary of the parade north past Lanier Rd / St Swithuns Road, so that it includes St Swithun's Church to the east (and some additional retail units to the west). This will appropriately reflect the presence of a community anchor and provide for local centre status.	Local Plan amended to designate Hither Green Lane as a local centre, with amendments to the boundary of the centre.

			Drink At Bob's bar, St Swithun's Church and its church hall, the nearby Hither Green Baptist Church, and the Woodlands Health Centre, Brindishe Green school and Mountsfield Park. A couple of large new cafes/restaurants will be opening soon. These, and its accessible location near Hither Green Train Station, all help preserve footfall and bring in visitors. It is also closer to, and on the same side of the railway line (unlike Staplehurst Road 'local centre') to the proposed new housing developments on Nightingale Grove and the Driving Test Centre. All this clearly demonstrates Hither Green Lane should be a 'local centre'.		
Ladywell Society	2	EC 11 Policies map	**Local Centre designation** Ladywell's shopping parade is proposed to be "upgraded" to a Local Centre. It appears that the parade fulfils four out of the five criteria for this category. The "missing" criteria is that it does not have "a small supermarket". However, not taken into account are the three convenience stores which currently grace the parade. The table and associated commentary should be updated to take this into account.	Noted. The indicators in the Local Centres Topic Paper (2020) have been set to provide a standardised approach for reviewing the centres. The Local Plan continues to provide that Ladywell parade should be re-designated as a Local Centre.	No change.
Transport for London	2	EC 11 Figure 8.2	Figure 8.2 should incorporate/highlight cycle links as well. It may help to include information on existing connectivity to various town centres by walking, cycling and public transport. Also, it may be helpful to describe or show on a map where walking and cycling networks should be, to establish connectivity in an integrated way (both existing and planned).	Noted. The Local Plan includes policies and maps for the strategic network of walking routes and cycleways, or the Lewisham Links. Development proposals will be required to refer to these along with site allocation policies. Additional connections and linkages will be considered through the design-led approach at the planning application and approvals process.	No change.
Blackheath Society no 2	2	EC 12	**EC12 Location of new town centre development**. We agree with the broad thrust of the policy. See concern below under EC13, which may be related.	Support noted.	No change.
Telegraph Hill Society	2	EC 12	**Policy EC12**, which seeks to "*ensure that all efforts have been made to direct new development to existing centres*" (**page 290**), is incompatible with the requirements to reduce car usage. New development should be directed towards the locations which ensure that facilities will be within walking distance of their potential users. The COVID-19 pandemic has also questioned whether developments which crowd people into central areas for shopping (or work) are appropriate going forward. These considerations imply the need for a more spread-out provision of shopping facilities than are currently available, rather than a more concentrated approach, and also a preference towards smaller retail units rather than larger format retail schemes.	Disagree. Draft Local Plan policy EC12 and supporting text and considered to be consistent with the National Planning Policy Framework and the sequential approach to town centre development.	No change.
Telegraph Hill Society	2	EC 12	The Explanation on **page 286** states that Lewisham Town Centre benefits from excellent public transport links. However it has no direct access rail links from the western side of the Borough (New Cross Gate through Honor Oak and Sydenham).	Noted. The statement reflects the Public Transport Access Level maps. Whilst recognising the comparatively good public transport access in Lewisham and Catford, the Local	No change.

			The Catford Major Centre is also poorly linked, leaving the western side of the Borough's use of Lewisham centres largely reliant on either car or bus.	Plan seeks to facilitate and enable improvements in line with the Council's Local Implementation Plan.	
Telegraph Hill Society	2	EC 12	The development of the District and Local Centres and development of out-of-centre facilities such as corner shops is particularly important in such areas.	Noted.	No change.
Blackheath Society no 2	2	EC 13	**EC13 Optimising the use of town centre land and floorspace**. We are concerned that there may be insufficient protection for maintaining the existing scale of retail and food/drink businesses in Blackheath, and therefore its sustainability. Difficulty in filling vacant premises due to a variety of factors, plus the power of chains, may lead to applications to enlarge/consolidate premises. This may make short-term economic sense but will ultimately reduce the rich choice of small independent businesses that gives Blackheath its unique character and differentiates it from other centres. We fear that Conservation Area and Listed Building status alone may be insufficient to protect against consolidation and enlargement of premises and may create an uneven commercial 'playing field', leading to a reduction in the unique range of offerings. We would welcome other more explicit protections e.g. indicative floorspace ranges or even limits.	Noted. Changes to the Use Classes order and extension of permitted development rights, including the introduction of the new Class E, limit the scope for the Council to control the mix of specific main town centre uses. However, the Local Plan has been amended to provide clarity over the use of planning conditions to secure certain types of retail uses where new development proposals come forward. It also sets out future needs for food and beverage retail floorspace, which can be used as a basis to consider planning applications. The Council does not exert planning control over the conversions or amalgamations of existing shop units, unless conditions or other legal agreements have been put in place. On new development proposals, the Council does have greater scope to ensure a mix of unit sizes, and can impose conditions to limit future amalgamations. Any such measures would need to be supported robustly by local evidence.	Local Plan amended to reflect and respond to changes to Use Classes Order. This includes a new policy making provision for the use of planning conditions to secure certain types of uses, such as retail, as new development comes forward. Local Plan amended to set out future needs for retail floorspace, including food and beverage.
London Borough of Southwark	2	EC 13	As predominately set out in policy EC13 Optimising the use of town centre land, Southwark supports Lewisham's approach to seek to ensure the vitality and viability of the town centre network in their borough, including through the application of sequential and impact tests in the preparation of local plans and on planning decisions, giving consideration to centres outside of their borough boundaries, where appropriate.	Support noted.	No change.

	2	EC 14	The plan proposed the alteration of most of the current town centre boundaries, the removal of secondary shopping frontages, identifies Lewisham Town centre as aspiring to be a Metropolitan Centre and Catford as a Major Centre. The latter seems a bit weird but can only be because the Town Hall and Council offices are located there and cannot be anything to do with its shopping offer which is poor.	Noted. The designations of Catford and Lewisham as major town centres are established by the London Plan. The draft Local Plan makes a limited number of changes to the boundaries of some town centres. It also removes secondary frontages and establishes Primary Shopping Areas, consistent with the NPPF. These changes will allow for greater flexibility in the range of uses that can locate within town centres, and help to support their long-term vitality and viability.	No change.
Blackheath Society no 2	2	EC 14	**EC14 Major and District Centres**. D is key for Blackheath. Seems unobjectionable. Wonder whether other metrics are needed e.g. minimum of 25% Class (A1) retail (cf 50% for C Major centres), and/or maximum retail floorspace per unit to avoid imbalance/keep out unfair competition which could erode choice in longer term. What about the proportion of other uses, like food and drink?	Noted. Changes to the Use Classes Order and extension of permitted development rights, including the introduction of the new Class E, limit the scope for the Council to control the mix of specific main town centre uses. The Regulation 19 Local Plan will need to be amended to take account of these changes in planning legislation.	No change.
Deptford Society	2	EC 14	**Page 293** EC14 Major and District Centres We would like to see clearer wording to set out how statements will be used in determination of applications. A clearer identification of measurement or quantitative requirements which should be demonstrated through submitted statements would be helpful.	Noted. Planning statements are a way for applicants to help demonstrate that their proposals are compliant with the local plan. These are considered on a case by case basis, depending on the nature and scale of development. The Council has published 'validation requirements' setting out the information that must be submitted with planning applications, which should be referred for further information.	No change.
Lee Forum	2	EC 14	We urge the use of district shopping centres as workplaces in tandem with retail, leisure and housing. Flexibility needs to be hard baked into developments so they are adaptable to changes in communities and economic circumstances. See also Part 3 comments on Leegate	Noted. The draft Local Plan recognises and seeks to enhance the role of town centres, including district centres, as employment locations. The town centre policies provide flexibility for a wide range of employment generating uses to locate in district centres.	No change.
Telegraph Hill Society	2	EC 14	Whilst New Cross Gate is designated as a District Centre, the provision of shops and facilities has considerably reduced over the years with the closure of all banks, the post office and a range of local shops leaving the community effectively with only a food shopping centre, one discount clothes shop, one bookshop and no significant electrical or other retailers. The closest general stationers, for example, is now at London Bridge. Plans to encourage a wider range of shopping facilities across the Borough need to be addressed in the Local Plan if the goal of reducing road traffic is to be achieved.	Noted. The draft Local Plan policies broadly seek to support the vitality and viability of town and local centres, and are considered to provide flexibility for a wide range of business uses to locate within them. It also introduces policies for meanwhile uses to encourage take-up of vacant units for meanwhile uses. Some factors affecting business viability are outside the scope of the Local Plan.	No change.
Telegraph Hill Society	2	EC 14	For the reasons explained in our comments on policy **EC12** we are not convinced that policy **EC14.D** is appropriate. The Primary Shopping Area for New Cross Gate is along the A2. This	A desktop research exercise using a widely recognised methodology informed the boundaries of Primary Shopping Areas. The extent of the Primary Shopping Area was formed	No change.

			will be, for many years to come, the least attractive area in which to shop. Whilst seeking to retain such vibrancy as can exist along the main road, the development of shopping areas to the side of the "Primary Shopping Area" would be beneficial both to the area as a whole and to the shops on the Primary Shipping Area. In our view, there would be considerable merit in designating the Hatcham Works site as the Primary Shopping Area for future development as it has the capacity to create a better local shopping experience than the A2 if sensitively developed (see paragraph 163).	around areas containing the greatest concentration of retail shops, the most accessible part of the town centre, natural order in terms of the following typology and avoiding breaks where appropriate and heritage considerations, including shop front design. Following regulation 18 consultation, the Council prepared a Retail Town Centre and Trends study, which identified a limited need for additional retail floor space over the new Plan period. And therefore, not expanding the Primary Shopping Area to include the whole site allocation for Hatcham Works is an evidence-led and proportionate approach. However, the frontages of Hatcham Works Site Allocation are included within the Primary Shopping Area to ensure a complementary cluster of retail uses along with New Cross Road.	
Telegraph Hill Society	2	EC 14	Policy **EC14.D** requires that non-A1 use must attract visitors and generate activity; we feel this is over restrictive. There can be no objection, in our view, to having commercial, office or residential units above A1 usage, provided that the ground floor is in A1 use. Indeed, much of the existing Victorian streetscape of the area is based on this layout.	Agreed. The policy is considered to be too restrictive and should be amended to provide for greater flexibility for uses above the ground floor level.	Local Plan amended to provide greater flexibility for appropriate main town centre uses located above the ground floor level within a Primary Shopping Area.
Telegraph Hill Society	2	EC 14	We welcome the statement in policies **EC14.G**, **EC15.C** and **EC16.B** that proposals for residential units on the ground floor level or below within designated shopping areas will be resisted.	Support noted.	No change.
Blackheath Society no 2	2	EC 15	**EC15 Local Centres**. Broadly support policy.	Support noted.	No change.
Blackheath Society no 2	2	EC 16	**EC16 Shopping parades, corner shops and other service points**. Support policy.	Support noted.	No change.
Hither Green West Campaign Group	2	EC 16	In addition to the 'local centre' designation for Hither Green Lane, the numerous retail properties on Springbank Road must be protected as a shopping parade. They are in a prime location by the rear entrance to Hither Green Train Station and have high footfall. Still, previous poor planning decisions have resulted in several 'harmful breaks' within the parades which have threatened its vitality. However, there is still a vibrant and viable retail offer here, with several new businesses opening (and thriving) in recent years. Therefore, we welcome proposals to prevent the loss of Class A1 retail use, but recommend robust and independent verification of any claims made by landlords and property owners when they allege there is no reasonable prospect of retaining a unit in retail use. We state this because we are aware landlords and property owners deliberately 'game' their marketing exercises to	Noted. Changes to the Use Classes Order and extension of permitted development rights, including the introduction of the new Class E, limit the scope for the Council to control the mix of specific main town centre uses including retail. The Regulation 19 Local Plan will need to be amended to take account of these changes in planning legislation. The draft Local Plan policy EC16 includes provisions to ensure development does not lead to harmful breaks in the shopping frontage of a parade. This includes evidence of a marketing campaign for a period of 1-year where residential development is proposed. This provision will be carried forward in the updated policy.	Local Plan amended to clarify and strengthen requirements on submission of evidence of marketing on proposals involving change to residential uses at the ground floor of parades.

			manufacture ‘evidence’ to support such claims. We also encourage the Council to consider ways to improve the quality of, and standardise the frontages of, properties that have been badly developed previously within these ‘harmful breaks’.		
	2	EC 17	The plan sets out some very laudable policies for controlling the percentage of restaurants and takeaways in each type of shopping area and identifies that in a number of locations there are a significant number of vacant retail units. However, it fails to quantify the number of charity shops, pound shops and betting shops and the uniformly poor environment of many of our shopping areas and the impact this has on footfall and use of each centre. The plan also fails to discuss properly what the effect of Covid, the resultant retail closures and the acceleration of online shopping might have on our shopping streets never mind the government’s move to allow businesses to change uses within a wider use class designation or to change to residential without needing planning permission. I would have expected some kind of analysis of what all these impacts might be and what proposals and policies might be brought forward to protect core shopping frontages, enhance the shopping experience and actively promote other people draw attractions.	Noted. Following the Regulation 18 consultation, a new retail and town centres study has been undertaken. This provides updated town centre health checks and also considers new data, including on the impacts of Covid-19, online shopping trends and new Permitted Development rights. The study and its recommendations have been used to inform the local plan.	Local Plan amended to identify and take account of updated town centre floorspace requirements, in line with latest Retail Impact Assessment and Town Centre Trends study. Concentration of uses policy updated to respond to changes to the Use Classes Order and permitted development rights.
Culverley Green Residents Association	2	EC 17	The plan sets out some very laudable policies for controlling the percentage of restaurants and takeaways in each type of shopping area and identifies that in a number of locations there are a significant number of vacant retail units. However, it fails to quantify the number of charity shops, pound shops and betting shops and the uniformly poor environment of many of our shopping areas and the impact this has on footfall and use of each centre.	Noted. Following the Regulation 18 stage consultation, a new town centres and retail study has been undertaken. This provides updated town centre health checks. The approach to managing hot food takeaways has been updated in order to respond to changes to the Use Classes Order and permitted development rights.	Concentration of uses policy updated to respond to changes to the Use Classes Order and permitted development rights.
Blackheath Society no 2	2	EC 18	**EC18 Culture and the night-time economy**. Need greater clarity about conflicts within mixed use areas between night time economy and residential uses. Smaller district and local centres have existing housing and are encouraged to develop more. What about amenity of residents, especially after midnight? Consider differentiating night time economy (12-6am) from evening economy (6pm-12).	Noted. Amenity considerations are addressed in Part 2 of the Local Plan in the High Quality Design section. Draft Local Plan policy 18.G also includes a cross-reference to these amenity considerations. The Local Plan must be read as a whole for planning decisions.	No change.
The St John’s Society	2	EC 18	Cultural and educational facilities should be dispersed throughout the borough to reduce car dependency. Need greater clarity about conflicts within mixed use areas between day/night time economy and residential uses.	Noted. The draft Local Plan supports and is not considered to preclude the development of cultural, education and other community facilities throughout the Borough. Policy EC18 seeks to build on the established strengths of particular centres and areas within the Borough as cultural	No change.

				quarters and evening/night-time economy hubs, at a strategic level. Amenity considerations are addressed in Part 2 of the Local Plan in the High Quality Design section. Draft Local Plan policy 18.G also includes a cross-reference to these amenity considerations. The Local Plan must be read as a whole for planning decisions.	
Theatres Trust	2	EC 18	Policy EC18: Culture and the night time economy Again we support this policy which positively promotes the value of cultural facilities to the borough.	Support noted.	No change.
Blackheath Society no 2	2	EC 19	**EC19 Public houses**. No comment on policy but see comment below on LP7 target.	Noted.	No change.
Brockley Society	2	EC 19	Pp311 EC19: Brockley Society welcomes the intention to protect pubs.	Support noted.	No change.
Hither Green West Campaign Group	2	EC 19	Hither Green West remains essentially free of public houses because of leases put in place by the Quaker house builder Archibald Cameron Corbett in the late 19th century. Recognising the economic, social and cultural value of public houses to neighbourhoods, the Plan should go further than a presumption in favour of retaining public houses, but should actively support creating new public houses where there is a lack of offer but strong demand.	Noted.	Local Plan amended to include additional point on support for new pubs where these contribute to liveable neighbourhoods by improving people's access to them, subject to other Local Plan policies.
Telegraph Hill Society	2	EC 19	This proposal has our strong support.	Support noted.	No change.
Telegraph Hill Society	2	EC 19	However, policy **E19.C** should also include, where a public house is in or adjacent to a cultural quarter as identified in **EC18,** a requirement that the cultural facilities of the public house are retained. We have seen a number of instances recently where proposals have been made, and in some cases accepted, for the replacement of a public house without the attached performance space which was a feature of the original public house: where possible this loss must be resisted. Such space and mixed use is essential for the commercial viability of the public house and enhances the variety of such community assets in any area.	Noted.	Local Plan amended to clarify that where replacement of re-provision of a pub is proposed, appropriate re-provision of existing amenity space (including cultural space and facilities) will need to be provided.
The Hatcham Society	2	EC 19	Pubs We find the Plan's guidelines on the protection of the borough's pubs to be robust and commendable. We are currently at risk of losing the Montague Arms in North	Support noted.	No change.

			Lewisham to developers. Although the pub is out of the Hatcham Conservation area, it is an important cultural asset close to us and similar pubs would be protected from developers if the Plan is approved. Pubs are often important heritage and cultural assets and we are pleased to see Lewisham step up to the challenge of protecting them.		
Theatres Trust	2	EC 19	Policy EC19: Public Houses Pubs across London have faced unique threats, but play an important role in supporting the wellbeing of local people and facilitating performance and culture at an amateur and grassroots scale. Therefore specific policy to protect pubs is supported and welcomed.	Support noted.	No change.
Blackheath Society no 2	2	EC 20	**EC20 Markets**. No comment – but we want to be able to retain our Farmer's Market	Noted. The draft Local Plan policy EC20 seeks to protect existing markets and market space.	No change.
Hither Green West Campaign Group	2	EC 20	Large sections of Stainton Road are sparsely populated, but it has good connections by bus from Brownhill Road and Hither Green Lane and trains from Catford and Hither Green Train Stations. Given its location next to Mountsfield Park, the road and adjacent playing fields could support a new food or flower market. This market could be similar to Hackney's Columbia Road Flower Market, Broadway Food Market or Brockley Food Market), as their settings and sizes are similar, without detracting from the town centre. This market would create new employment opportunities, attract visitors into the area and increasing footfall on nearby Hither Green Lane and Brownhill Road	Noted. The draft Local Plan broadly supports provision of new and enhanced market space. Proposals for new market space at this location would be considered having regard to the Local Plan policies and licencing, where appropriate.	No change.
Telegraph Hill Society	2	EC 20	The explanation (**page 316)** indicates that the word "markets" encompasses street markets, specialist and farmers' markets. If that is the intention, then the explanation and policy appear to require that farmers' markets should also apply the "town centre first" principle. We would consider this to be wrong: farmers' markets arguably are best placed where there is no local centre, thereby ensuring they do not detract from the town centre markets, allow the local population to access the produce without having to travel to a town centre, and have their financial viability assured, with their higher priced produce. The farmers' markets in Brockley and Telegraph Hill have been successful because they are not located in a town centre. Policy **EC20.B** needs rewording to exclude farmers' markets.	Disagree. The draft Local Plan markets policy reflects the sequential approach to main town centre uses set out in national planning policy. The policy would not preclude new markets in out of centre locations.	No change.
Telegraph Hill Society	2	EC 20	More generally we have concerns that Policy **E20** is over-restrictive. Whilst we understand that the Council wishes to preserve the vitality of town centres, local markets can provide residents with the produce they require without the need to travel into town centres. In the light of the need to reduce car usage, markets should be encouraged across the Borough and not limited to town centre sites. In such cases it would also seem that the best places to encourage such markets would be where there was not good public transport, given the difficulties thereby of travelling into town centres by car. Policy **E20.B.c** would perversely seem to encourage the reverse.	Disagree. The draft Local Plan markets policy reflects the sequential approach to main town centre uses set out in national planning policy. The policy would not preclude new markets in out of centre locations. However, given the high number of visitors markets attract and to discourage car use, it is considered reasonable to require them to be located in areas that are well-connected.	No change.

Blackheath Society no 2	2	EC 21	**EC21 Visitor accommodation**. Is there baseline data on existing visitor accommodation (amount, location, purpose) and forecast need for the future?	The London Plan suggests that 58,000 bedrooms of serviced accommodation across London will be needed by 2041. It does not set out need by Borough. This is set out in the policy supporting text.	No change.
Blackheath Society no 2	2	EC 22	**EC22 Meanwhile [*temporary*] uses**. We support the policy.	Support noted.	No change.
Telegraph Hill Society	2	General	Changes to Permitted Development Rights are likely to challenge both the Council's vision and its detailed policies as set out in Part Two of the Plan. Management of these will therefore require more engagement by the Council in Article 4 directions where appropriate. We appreciate that funds are not currently available to significantly extend protection through Article 4 directions, but that does not mean that this will be the case throughout the Plan period to 2040. A commitment should be made that, where and when appropriate, powers will be taken to ensure that the Vision as set out in the Plan is protected. The various policies in Part Two appear to conflict with each other as do policies within Part Two and Part Three. Instances will arise for example in conflicts between preserving local character as required in **HE1** and **Strategic Objective F13** and: • optimising site-capacity (**QD6**), building tall towers (**QD4**) and preserving local character (**HE1**) • optimising the use of small housing sites (**HO2**) or developing infill sites (**QD11**) and preserving local heritage (**HE1**) • minimising greenhouse gas emissions (**SD3**) or • Managing heat risk (**SD5**). 73. Given that heritage assets and their surroundings, once destroyed, cannot ever be recovered we would prefer that the heritage policies are given precedence but, however this is decided, the Plan needs to give clarity as to which policies take precedence in the event of conflict. Otherwise the Plan is in danger of becoming a "developers' charter" whereby one part of the Plan can be played off against another as developers pick and choose to their advantage, with the ever present threat of costly resolution through the courts.	Noted. The making of Article 4 Directions is outside the scope of the Local Plan. The Council may in the future consider the need to introduce additional Article 4 Directions to ensure the delivery of the spatial strategy. Whilst acknowledging that there are tensions between delivering growth and preserving heritage assets, the draft Local Plan is considered to strike an appropriate balance whilst taking a positive approach to new development, in line with the National Planning Policy Framework. The draft Local Plan part 2 policies also introduce a significant step change in the approach to sustainable design and construction, and will help give effect to the Council's Climate Emergency Action Plan.	No change.
Telegraph Hill Society	2	General	The status of each "Explanation" is unclear. There are a considerable number of statements of intent in the "Explanation" paragraphs (for instance at **§ 6.10** on Lewisham's Historic Environment, see paragraph 136 on policy **HE1**; or on Telecommunications, see paragraph 224 on **TR7**) which are not carried through to a policy on the green pages and therefore do not seem to be explanations for the policy. If the "explanation" *obiter dicta* are meant to be policy they need to be reflected in the policy, if they are not and do not in fact explain a policy, an indication needs to be given as to what their purpose is and what weight will be given to them in	Noted. The policy supporting text provides justification for the approach and information to support its implementation. The policy supporting will be comprehensively reviewed and updated where officers consider changes are necessary.	Policy supporting text reviewed and updated throughout the Local Plan.

			planning decisions. Are such comments better described as "supplementary guidance" rather than as "explanation"?		
Telegraph Hill Society	2	General	This section sets out a number of comments generally applicable to Part Two of the Lewisham Plan and also, where applicable, to other sections including Part One when reference back is required.	Noted. Responses to additional representations set out elsewhere in this Consultation Statement.	No change.
Blackheath Society no 2	2	General	**Managing Development** – just 2 paras. Part Two policies must be considered with Part One Strategic Policies & Spatial Strategy and with Part Three Neighbourhood/Place Priorities. YES – but challenging because of complexity and conflicts between all factors	Noted. Part 1 of the draft Local Plan states that the plan must be read as a whole for planning decisions.	No change.
	2	GR	The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children	Noted. The draft Local Plan seeks to protect and enhance the borough's network of green infrastructure and open spaces, including by addressing areas where there are deficiencies. Further details are set out in the Part 2 section on Green Infrastructure. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	No change.
	2	GR Figure 3.3	**Fig 3.3** states it represents Green Infrastructure, but only seems to have the formal parks. If it's just the parks, then the figure needs relabelling, otherwise it should include ALL green infrastructure, including MOL, SINCs, nature reserves, green corridors, etc.	Noted.	Figure 3.3 is revised to include all typologies of open space excluding informal amenity green space in line with the Open Space Review.
	2	GR	The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children.	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	No change.

	2	GR	The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children.	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces.	No change.
	2	GR	We currently have a good selection of green spaces but they would need expanding if more families are to move to the area. In particular, the playground in Edith Nesbit park needs regeneration.	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	No change.
	2	GR	The plan should state the importance of developing new green spaces and improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	No change.

	2	GR	I am responding to the Local Plan. There are many reassuring phrases around the need to care for the natural world across the Borough but few clear proposals as to how Lewisham, a council that has declared Climate Emergency, plans to mitigate the drastic reduction in biodiversity seen in recent years. I am aware from personal experience that the Environmental Team within the council works hard to influence policy but also that the team has reduced in size in recent years and is therefore under huge pressure. I would like to see more consultation with conservation experts and local groups around how Lewisham can make step changes in the way that existing green spaces are managed and protected and other changes that can be made to combat climate change.	Noted. The draft Local Plan broadly supports the protection and enhancement of biodiversity and open space across the borough. Part 2 Policy GR3 sets out the framework to deliver biodiversity net gain. In addition, the Local Plan provides policy framework for the delivery of green infrastructure and biodiversity. Other service areas within the council including the Regeneration team work in partnership with key stakeholders like Natural England, Environment Agency and local community groups to ensure the delivery of policies sets out in the local plan. Part 4 on Delivery and Monitoring sets out the strategic policy on partnership working. Council officer resourcing is outside the scope of the Local Plan.	No change.
	2	GR	The plan must make clear the importance of green spaces as more people come into the area. The management of new and existing green spaces must balance the needs of residents with the needs of the natural world, for example by prioritising naturalistic planting and 'no mow' policies in some areas of parks such as Edith Nesbit Gardens and Manor House Gardens. Wildlife must also be encouraging as part of the new development, with swift bricks, bat boxes and the like integral to the buildings. It is obviously vital the buildings themselves should follow best practice in terms of the mitigating the environmental impact of both the building work and the ongoing impact of the housing and shops.	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	No change.
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	2	GR	The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities.	No change.

			Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children.	Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	
	2	GR	It appears that a map on page 8 of the Parks and Open Spaces Plan, which supports the Local Plan, seems to have identified only part of the Grove Park Nature Reserve, and that a section is coloured white, which could give developers an indication that this wooded area is available for development and result in the loss of some of our valued green space. Can this be rectified?	Noted. Changes to the Parks and Open Spaces Strategy 2020 cannot be made since it has been adopted. The wooded area referenced is designated as Metropolitan Open Land and is therefore afforded the same level protection as Green Belt. A new policies map has been prepared. This clearly sets out the spatial extent of different land-use designations in the Local Plan. This is also reflected in the Changes to the adopted Policies Map document.	A new policies map has been prepared. This clearly sets out the spatial extent of different land-use designations, including Metropolitan Open Land, in the Local Plan.
	2	GR	The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children. The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	No change.
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			great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children.	Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	
	2	GR	The plan should state the importance of developing new green spaces and also improving existing areas for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children. The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	No change.
	2	GR	**Natural Heritage** • There should be a recognition of the Great North Wood heritage, along the ridge from Sydenham Hill to New Cross. Although only pockets of actual woodland remain, it is still a dominant part of the natural tree-rich environment and a feature that can be used to enhance biodiversity and eco-system services in any developments in the area. Its status should be the same as the rivers and parks that have been mentioned in the plan. • The Council should work with the London Wildlife Trust to formulate good environmental practice for all developments and enhancements of the natural resources in the Borough. • There should Tree Protection Orders on all street trees and notable trees on private land throughout the borough, not just in conservation areas. The expectation must be that mature, healthy trees will be protected because of their amenity and eco-system services and a high level of evidence required, and mitigation provided, for any work on them to be approved. • There needs to be a fundamental acknowledgment that the eco system and amenity services of mature, healthy trees cannot be replaced in the short or medium term by	Noted. Protecting and enhancing natural and historic assets like Great North Wood heritage is the heart of the local plan. Part 2 policy HE1 seeks to preserve or enhance the value and significance of Lewisham's historic environment and its settings. The Council, where appropriate, works with the London Wildlife Trust. For instance, they have been consulted as part of regulation 18 consultation. The recognition of the Great North Wood has been addressed elsewhere in Plan within Part Three under Lewisham's West Area. The Council's Parks and Open Spaces strategy sets out arrangements for managing open spaces. The Local Plan seeks to ensure development proposals maximise opportunities for tree planting, particularly on streets. Under current guidance, Tree Preservation Orders (TPOs) are not recommended where you have a responsible	In accordance with the Metropolitan Open land Review Additional Sites Report, the Forest Hill to New Cross green corridor has been designated as a proposed Metropolitan Open Land, which has the same level of protection as Green Belt. In accordance with the Open Space Review,

			saplings. The Climate Emergency is now and cannot be mitigated for in 50 – 100 years time. Replacement of large, especially native trees by 'convenient' smaller or exotic varieties should also be avoided, to give our native fauna and flora the maximum opportunity to thrive. • Street trees, in planting pits that allow for wild plants and flowers beneath, should be an essential part of the Borough's green infrastructure and provided by the Council, not the preserve of residential areas wealthy enough to fund their own trees. We desperately need to see more pleasant green roads to walk and cycle along to help with the shift away from private vehicles. Reducing the number of cars is not enough; roads need to be inviting places to enjoy as part of getting from A to B. These would also be part of a vital network of green corridors for nature. • The air quality and safety for non-car users on the major roads, like the South Circular A205 needs urgent attention. There needs to be a better balance between pedestrian and motorist rights, which could work to the benefit of both. Eg, pedestrian crossings often take so long to change to the pedestrian's favour that they have long ago taken a chance and run across instead. Thus when the traffic is stopped, there are often no pedestrians waiting to cross. • The A205 crossing at Forest Hill Station is dangerous and needs to be changed as soon as possible, giving higher priority to pedestrians. • All open green spaces (other than sports ground) under the Council's control should be managed for wild flowers and grassland natural to the area, which are so essential to the insects which drive the food chain. • Trees and glades in parks and other woodland, should be managed for wildlife. This means that only trees or limbs that are dangerous should be removed and the importance of dead wood, both standing and on the ground, recognised as a very rich habitat. • All developments should be in the context of the rights of nature to exist and flourish in and for itself. We have to see an end to the exploitation of natural resources for human only benefit.	landowner who manages the trees. As most street trees are the responsibility of the Council, TPOs are not required. When the Council removes street trees, this is done for legitimate reasons, generally around safety concerns or subsidence issues. The Council is working with Street Trees for Living on an ongoing basis to increase the number of street trees within the borough. Following the Regulation 18 Consultation, an Open Space Review has been prepared to inform robust protections for open and green spaces, including Hillcrest Estate Woodland, within a clear hierarchy.	Hillcrest Woodland has been designated as proposed Strategic Open Space. Sydenham Hill Ridge has been identified as an Area of Special Local Character, via amendments to the schedules.
	2	GR	The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well-landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment.	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies.	No change.

				In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	
	2	GR	Biodiversity and greening Green spaces to help us breathe and for flower and fauna to provide an environment for insects, bees and birds to live are crucial in the fight against climate change. Too many front gardens are being paved or concreted over. The local plan should put in place measures that rewards and encourages the upkeep of front and rear gardens and if possible prohibit complete concreting over of outdoor spaces. In a city like London this luxury of space comes with great privilege and should be treated as such. In addition a sense of civic pride should be engendered in tenants of council owned properties. Weeding, mowing a lawn or trimming a bush doesn't cost a huge amount of money it just involves investment of a little time and a sense of pride. I grew up on a council estate. It's possible, it's basically a resetting of mindset. If someone is given the benefit of a home with a front or back garden why can't they be expected to keep their garden in a fit state in return?	Noted. The draft Local Plan seeks to protect and enhance the Borough's network of green infrastructure, including garden land. The maintenance of existing residential gardens is generally outside the scope of the Local Plan. However, for new major developments the draft Local Plan includes requirements to ensure that satisfactory arrangements are made for the maintenance and management of the public realm. There are Permitted Development rights that allow for property owners to pave over front gardens subject to conditions surrounding the mitigation of flood risk.	No change.
	2	GR	New Riverside Park The population will grow dramatically due to 10k homes in the Evelyn Ward plus another 7k homes at Millwall and Canada Water. There is no plan to increase green space despite council documents stating the need to do so. Make delivering a new riverside park for Deptford on the protected wharf at Convoys Wharf a priority.	Noted. The draft Local Plan Part 2 Policy GR 1 provides policy framework to maximise opportunities for enhancing existing green infrastructure and creating new provision. Part 3 of the Local Plan (Lewisham's North Area) sets out objectives to enhance access to the River Thames, with new public realm and open space it. Further detailed requirements are set out in the site allocation policies, including for Convoys Wharf.	No change.
	2	GR	The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children.	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	No change.
	2	GR	4. Please do not confuse OPEN spaces with GREEN spaces. There is a world of difference. An OPEN car park or cemented area is not A GREEN space to enjoy! It is easy to try to make it	Noted. The term open space is applied in the London Plan Policy G4 and includes a variety of typologies from Parks and Gardens to Cemeteries - which provides for green	Local Plan amended to clarify the

			look as if we have more green communal spaces available, by using euphemisms of this kind but it is a travesty and must be avoided very carefully.	space - based on their primary function. A car park is not considered open space. However, it is acknowledged the Local Plan should provide greater on what is meant by open space, the level of protection afforded to different types of open spaces, and that the creation of green space should be prioritized in the creation of new publicly accessible open space.	different typologies of open space within an open space hierarchy and the level of protection afforded to each. This include clarification between green open spaces and other open spaces (e.g. hardstanding but part of public realm).
	2	GR	The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs and a small play area for young children. As more young families move into the area they will need more play areas and safe green spaces for their children.	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	No change.
	2	GR	The plan should state the importance of developing new green spaces and improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	No change.

	2	GR	The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces.	No change.
	2	GR	Open Space and Play Space The plan has various diagrams which purport to indicate those areas of the borough which are deficient in open space and play space and also makes various proposals for amending the boundaries of some current open spaces, removing some areas from Metropolitan Open Land and adding some existing parks to be designated as MOL. So far so good. However, even if the Borough is reasonably well served with open spaces, by which I mean proper parks not random bits of hard paving, the level of additional residential unit building should be leading to positive policies to require a certain amount of communal open space, in addition to private open space, per unit that is in one aggregated useable space, not random bits euphemistically called pocket parks. Each large residential site should be required to provide a publicly accessible open space plus childrens play areas. This should be specified for each site in the plan, the planning brief if the government changes the local plan system as previously indicated, or in any outline masterplan planning permission and legal agreement. In addition the council should indicate on the plan where it will proactively seek to improve current open spaces, acquire land to provide new green open spaces using CIL and where and what type of new play areas it wants to establish to mitigate the deficiencies identified. The current pandemic has demonstrated how essential our green spaces are to our health and well being. During the 3 (so far) lockdowns it has been noticeable how many people have used the Boroughs parks, to the extent they have been overused, litter strewn and in places turned into mud patches. Many people do not have access to outdoor green space and so the active improvement of our existing spaces, expanding and increasing those spaces and aiming to have everyone living within a 10 minute walk of a useable green space designed for	Noted. The Local Plan acknowledges that Lewisham's network of green and open spaces, waterways and green features (such as parks, street trees and residential gardens) make an important contribution to local character, heritage, and health and wellbeing of people in the borough. The draft Local Plan proposes to apply the London plan housing standards including for indoor and outdoor amenity space, and children's play space. The requirements to provide or enhance existing open space and green infrastructure are addressed in the Local Plan Part 2 policies on Green Infrastructure. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. The draft Local Plan Part 2 policies seek to ensure that adequate arrangements are in place for the management of open space and public realm, where this is incorporated in new development. The management of parks is outside the scope of the Local Plan. The Council's Parks and Open Spaces Strategy sets out priorities for park investment and improvements.	No change.

			both active and passive play and exercise should be the minimum that the plan sets out to achieve. In common with many of our previous comments on lost opportunities and learning lessons (e.g. Lewisham Gateway) a useful lesson could be learnt from the recent revamp of Beckenham Place park. A wonderful project to remove the golf course and create a new accessible open space. But the chaos of the opening weekend with the lack of security and supervision and the failure to think through how people would break down barriers, overcrowd the 'beach', fail to supervise their children, park all over the grass areas and the continuing pressure caused by its popularity threatens to fatally damage all the hard work that went into creating it. If covid persists and we are stuck with staycations for a while then open spaces need to be very actively managed and controlled to make them safe and enjoyable for all.		
	2	GR	The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children.	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	No change.
	2	GR	P349 - Tautology of 'Lew was named one of top boroughs…' with 'Did You Know Lew was named in top 3…' Replace third line with 'We came second …..'	Noted. This section of the draft Local Plan was an informative included to support the Regulation 18 stage consultation. The section will be removed from the Regulation 19 plan and therefore the factual correction is not required in this instance.	No change.
	2	GR	p350 The image is of a boring bush which could be anywhere!! A shot of a riverside scene with step access and perhaps people chilling with plenty of vegetation is very close by (just litter pick the cans and bags first). I have just seen a much better image on P402 in 'Energy Infrastructure'; please relocate this image as less relevant (to most people) there. p351 This image is also of Cornmill Gdns, which now has decking that is cordoned off as rotted and dangerous as a result of no maintenance budget included in original s106 (although L&Q responsible for upkeep perhaps as they charge a	Noted. This section of the draft Local Plan was an informative included to support the Regulation 18 stage consultation. This section will be removed from the Regulation 19 plan, and therefore updates to images and text on pages 350 and 351 are not required. The photos included in the draft Local Plan are provided for illustrative purposes only and do not carry material weight for planning decisions. As the plan is progressed through	Local Plan amended to add numbering to all images on page 354 and amend the name of image one from Sayes Court Park to Forster Memorial Park.

			levy for grounds maintenance). It is a pity that the river cannot be seen whereas Ladywell Fields northern field would have been better pic). Please add the river Pool to the rivers list (the active 'Friends of the Pool' volunteers group would be quite annoyed). P352 Not the best image of Ladywell Fields as no visible river (being a flood plain/ original water meadow) but no river in sight. The imposing Barratt's Catford Village (Greyhound Track site, which Ladywell Fields Park User Group objected to its scale) did little to enhance the river or park. The middle and southern section improvements were funded by the (extended specially into Lewisham) Thames Gateway Parklands project. P354 Images have lots of greenery but no rivers, only a pond in MHG Image 4 (where the River Quaggy desperately needs bank naturalisation and improved access). Image 1 is not Sayes Court Park it looks more like Forster Memorial Park. Image 5 is a bad pic as has palisade fencing up whilst the lake is being excavated (by the look of it) so better ones must be available.	the next stages of the process, the Council may take the opportunity to update these, subject to resources available.	
Blackheath Society no 2	2	GR	We welcome identification in the Plan of the importance of green infrastructure to the well-being of the borough's residents. We regret that specific elements of the Plan (see below) are not backed up with baseline data and time driven targets.	Noted. Responses to additional representations set out elsewhere in this Consultation Statement.	No change.
Climate Action Lewisham	2	GR	**Green infrastructure** Our key concern with the green infrastructure section of the plan is the phrasing of policies and explanations which is frequently weak or ambiguous. Lewisham has declared itself to be in a state of climate emergency, yet the "Green Infrastructure" section has weak wording (for example "we expect" and "should") and conditions that are far too easily negotiable for developers looking to maximise profit in lieu of preserving natural assets. For example, policy GR1B 'Development proposals will be expected to investigate and maximise opportunities for enhancing existing green infrastructure and creating new provision on site through the design-led approach'. Or policy GR3B 'developments…should also seek positive gains for biodiversity wherever possible'. This language is not concurrent with a genuine commitment to addressing the climate crisis. Words like 'must' in place of this weaker wording would ensure that future developments are in absolute alignment with the aims of the Climate Action Plan: this section must be rewritten accordingly in order to demonstrate that the crisis is being taken seriously.	Noted.	Local Plan amended to provide more authoritative language where possible. For example, by stating that development proposals "must" rather than "we expect" or "should" or "will be expected to".
Climate Action Lewisham	2	GR	In some areas, greater clarity is also required. For example, in policy GR3E (P. 367) it states that 'a suitable qualified surveyor must carry out the ecological assessments. It is essential that all surveyors are independently appointed, and to the highest standard. Such professional requirements are outlined in reference to other parts of the document but must be specified	The requirement for a suitably qualified ecologist/surveyor is considered appropriate; however the plan will be updated to specify 'chartered ecologist', to ensure professional standards are upheld.	Local Plan updated to refer to requirement for ecological assessments to be undertaken

			according to each section in order to prevent potential exploitation, bias or unqualified decision making.		by “chartered ecologist”.
Culverley Green Residents Association	2	GR CI	**Open Space and Play Space** The plan has various diagrams which purport to indicate those areas of the borough which are deficient in open space and play space and also makes various proposals for amending the boundaries of some current open spaces, removing some areas from Metropolitan Open Land and adding some existing parks to be designated as MOL. So far so good. However, even if the Borough is reasonably well served with open spaces, by which I mean proper parks not random bits of hard paving, the level of additional residential unit building should be leading to positive policies to require a certain amount of communal open space, in addition to private open space, per unit that is in one aggregated useable space, not random bits euphemistically called pocket parks. Each large residential site should be required to provide a publicly accessible open space plus childrens play areas. This should be specified for each site in the plan, the planning brief if the government changes the local plan system as previously indicated, or in any outline masterplan planning permission and legal agreement. In addition the council should indicate on the plan where it will proactively seek to improve current open spaces, acquire land to provide new green open spaces using CIL and where and what type of new play areas it wants to establish to mitigate the deficiencies identified. The current pandemic has demonstrated how essential our green spaces are to our health and well being. During the 3 (so far) lockdowns it has been noticeable how many people have used the Boroughs parks, to the extent they have been overused, litter strewn and in places turned into mud patches. Many people do not have access to outdoor green space and so the active improvement of our existing spaces, expanding and increasing those spaces and aiming to have everyone living within a 10 minute walk of a useable green space designed for both active and passive play and exercise should be the minimum that the plan sets out to achieve.	The draft Local Plan acknowledges that Lewisham’s network of green and open spaces, waterways and green features (such as parks, street trees and residential gardens) make an important contribution to local character, heritage, and health and wellbeing of people in the borough. The draft Local Plan proposes to apply the London plan housing standards including for indoor and outdoor amenity space, and children’s play space. Lewisham’s Local Plan Part 2 policy GR1 supports opportunities for enhancing existing green infrastructure and creating new provision across the Borough. The draft Local Plan has been informed by an Open Space Assessment, which has mapped areas of deficiency in access to different types of open spaces. The policies included targeted measures to address deficiencies. This will help to ensure and improve access to high quality open space throughout the Borough. The Council has prepared an Infrastructure Delivery Plan alongside the local plan. This includes priorities for investment in Green Infrastructure.	No change.
Culverley Green Residents Association	2	GR	**The ‘green’ elements are disingenuous** No one disagrees with the benefits of more green space, but including a tree map and saying that there are parks within walking distance does not constitute a green vision. A few hanging baskets?. Who is going to maintain them? This so called Green plan is not good enough.	Disagree. The Local Plan vision, objectives and policies together are considered to provide a sound basis for the protection and enhancement of green infrastructure across the Borough. The maps provided reflect factual baseline information drawn from the technical studies.	No change.
Deptford Society	2	GR	**Page 351** Mention of ‘considered proposals’ to allow reshaping (with no overall loss of space) existing green spaces. This is unclear. Our concern is with identified site allocations such as	Noted. The Local Plan makes clear that the reconfiguration of open spaces will only be considered in exceptional circumstances and that development must not result in the	Local Plan amended to provide more

			the Albany site with a large existing green space, care should be taken not to 'reshape' by splitting, resulting in less effective public green space.	loss of green space, and provide for demonstrable improvements in its quality and function.	clarity and detail with regards to which typologies of open spaces and under what circumstances the reconfiguration of open space will be supported as part of a development proposal. With respect to the Albany Theatre Community Gardens, the impact of the development proposal on this green space will be addressed through the development management process, having regard to the Local Plan policies. The site allocation guidelines have been amended for clarity.
Deptford Society	2	GR	**Page 353** There is conflation of 'green space' and 'open space' throughout the Local Plan and repeated through sections GR1 and GR2. Open space should not be referred to in this section other than to protect green space' from becoming 'open space'.	Noted. The term open space is applied in the London Plan Policy G4 and includes a variety of typologies from Parks and Gardens to Cemeteries - which provides for green space - based on their primary function. However, it is acknowledged the Local Plan should provide greater on what is meant by open space, the level of protection afforded to different types of open spaces, and that the creation of green space should be prioritized in the creation of new publicly accessible open space.	Local Plan amended to clarify the different typologies of open space within an open space hierarchy and the level of protection afforded to each. This include clarification

					between green open spaces and other open spaces (e.g. hardstanding but part of public realm).
Environment Agency	2	GR SD	**Partnership working to protect and improve the environment** We support the green and blue Infrastructure policies and are keen to work with you on how the policies will be delivered and an action plan to deliver the local plan policies and share evidence on existing environmental issues such as pollution incidents and hot spot areas for targeted interventions and enforcement as required. We are keen to be involved in any updates to the Lewisham River Corridor improvement plan and how it can help deliver Biodiversity Net Gain.	Support noted. The Council will consult the public and key stakeholders, including the Environment Agency, on the preparation of Supplementary Planning Documents.	No change.
Forest Hill Society	2	GR SD	**Environment and Local Green Space Development - Identification and Designation** The Forest Hill Society would stress, as a priority, the need to maximise efforts to clean our air. The potential damage to health by poor air quality is well documented and now universally accepted. As the Coroner's report suggested in the recent case of [name removed], air pollution resulting from her living in close proximity to the South Circular road made a material contribution to her poor health and subsequent death. The redesign of Forest Hill's station area would create not only an enhanced commuter/pedestrian experience but would also provide the opportunity to establish a green parklet with shrubs and trees which would help absorb pollutants, capture carbon, block car emissions and create a "green barrier", all with known benefits in terms of health and general well-being. The Society agrees with the LPA that building is one of the most polluting activities in the UK economy. Demolition proposals have disastrous environmental consequences, so where possible we should prioritise refurbishment over new-builds with structures which combine long-term sustainability and energy efficiency with use of natural materials. But the environmental impact of new structures *can* be mitigated by re-wilding and this could be relevant in the case of Forest Hill's station. There is a known effectiveness of trees in reducing noise and excessive heat as well as capturing carbon, and the beneficial effects of greenery as de-stress and calming	The draft Local Plan has been prepared having regard to the principles of sustainable development and Good Growth objectives set out in regional and national planning policy. This requires the consideration social, economic and environmental factors in an integrated way, whether through the plan making process or on planning applications. The draft Local Plan Part 2 Policy SD6 requires all new development to be at least air quality neutral and contribute towards improving air quality within the Borough, in line with the London plan. The Local Plan includes policies and site allocations which aim to improve the environment of the Forest Hill district centre and surrounds, including the station approach. The Local Plan also seeks to transform the South Circular by applying the Healthy Streets principles; and this may provide for greening and other public realm improvements around the station. However comprehensive re-design of the station area and highway network would be contingent on a strategy/plans and funding from Network Rail and Transport for London, and not considered feasible or deliverable at this time. The draft Local Plan recognises the important role played by green infrastructure in neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure,	No change.

			influences have been proven. We should therefore aim to preserve, protect, and add to, existing greenery and street trees and create new green spaces, or “parklets”, throughout Forest Hill which would have the additional benefit of forming habitats to support bees and other species, helping to turn the tide on the decline of insect numbers. Providing equitable access to green space is an important goal of health-oriented urban policies. Improving the availability of green spaces in under-served and socioeconomically disadvantaged communities may help to reduce health inequalities in urban populations. A review of urban green space interventions has been carried out by WHO to assess environmental and health outcomes of urban green space actions and to inform local practitioners about the aspects to consider when planning green space interventions (WHO Regional Office for Europe (2017) Urban green space interventions and health. A review of impacts and effectiveness. WHO Regional Office for Europe, Copenhagen).	including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies.	
Forest Hill Society	2	GR	Duncombe Hill Green is included in the draft Neighbourhood Plan (Policy GS1 d) from the HopCroft Neighbourhood Forum as an important amenity of the local community that contributes to the streetscape and helps to disperse traffic pollution. It has not been offered any recognition in the Lewisham Local Plan, nor has it been marked as a Local Green Space, Village Green or London Square. We believe that the Local Plan should recognise the value of this green space for the community and seek to protect it together with other recognised green spaces.	When adopted, the Neighbourhood Plan will form part of the development plan and sits alongside Lewisham’s local plan. Decisions on planning applications will be made using both the local plan and the neighbourhood plan, and any other material considerations. Therefore, there is no need to repeat designations such as Local Green Space covered in the neighbourhood plan on the policies map for the Lewisham Local Plan. London Squares are set by the London Squares Preservation Act 1931 and Duncombe Hill Green was not identified within this Act. Following the Regulation 18 Consultation, an Open Space Review has been prepared to inform robust protections for open and green spaces, including Duncombe Hill Green, within a ~~in~~ clear hierarchy.	In accordance with the Open Space Review, Duncombe Hill Green has been designated as Strategic Open Space. Open Space policy amended to clarify that Local Green Space has the same level of protection as Metropolitan Open Land and Green Belt.
Forest Hill Society	2	GR	**Westbourne Drive Park** continues to be excluded from any formal designation as a Local Green Space, in an area that is particularly lacking in parks. With plans to increase residential density around this area (Valentine Court, Perry Vale and Forest Hill station), we recommend the formal adoption of this green space as Metropolitan Open Space or Local Green Space.	Following the Regulation 18 Consultation, an Open Space Review has been prepared to inform robust protections for open and green spaces, including Westbourne Drive Park, within a clear hierarchy.	In accordance with the Open Space Review, Westbourne Drive Park has been designated as Strategic Open Space.
Grove Park Neighbourhood Forum	2	GR	Some green space maps throughout the local plan miss a significant part of the MOL land in Grove Park.	Noted.	Figure 10.2 revised to capture the full extent of Grove

					Park Nature Reserve also designated as MOL.
Grove Park Neighbourhood Forum	2	GR	The Local Plan should include all Local Green Spaces highlighted in the Neighbourhood Plan including the Ringway Gardens and Marvels Lane amenity green.	When adopted, the Neighbourhood Plan will form part of the development plan and sits alongside Lewisham's local plan. Decisions on planning applications will be made using both the local plan and the neighbourhood plan, and any other material considerations. Therefore, there is no need to repeat designations such as Local Green Space covered in the neighbourhood plan - on the policies map for the Lewisham Local Plan. Furthermore, following the Regulation 18 Consultation, an Open Space Review has been prepared which has informed robust protections for open spaces within a clear hierarchy, including Marvels Lane amenity green and Ringway Gardens	Open Space policy amended to clarify that Local Green Space has the same level of protection as Metropolitan Open Land and Green Belt. In accordance with the Open Space Review, Ringway Community Gardens has been designated as Strategic Open Space as well as a Site of Borough Importance for Nature Conservation.
Grove Park Neighbourhood Forum	2	GR	The SINC review needs to be updated to reflect the wet woodland priority habitat contained within Hither Green SINC.	Noted. Following the Regulation 18 Consultation, an additional targeted SINC study has been prepared, which assessed whether the Hither Green to Grove Park corridor met the criteria to be elevated from sites of borough importance for nature conservation to a single combined site of metropolitan importance for nature conservation. The study found that the Hither Green to Grove Park corridor does not currently warrant Metropolitan SINC status. The updated and targeted study also confirmed that Hither Green Sidings SINC contains wet woodland priority habitats.	No change.
Grove Park Neighbourhood Forum	2	GR	The council has included a policy allowing the reconfiguring of open spaces. This is a dangerous precedent, and could be taken advantage of by developers.	Noted. The Council has prepared an additional Open Space Review to help inform which types of open and green spaces where reconfigurations may be supported in order to achieve demonstrable improvements in the quality of open space and public access to it.	Open space policies revised to clarify which types of open and greens where reconfigurations may be supported and under what

					circumstances (for example, the reconfiguration is delivered through comprehensive development, in line with a site-wide masterplan, and will ensure a viable future for the open space.
Grove Park Neighbourhood Forum	2	GR	The Consultation asks: "*If we should allow some open spaces to be re-shaped to improve their quality (with no overall loss of space) or not provide such flexibility. Making changes to the boundaries of spaces, or to their status as open spaces/ sites of importance for nature conservation, drawing on our studies*." **We emphatically oppose the inclusion of such a policy as it is an invitation to chip away at the edges of Green Space.** The intention of the policy was not explained clearly during the online briefings. We are unclear how this policy will work and maintain no net loss at the same time.	Noted.	Local Plan amended to provide more clarity and detail with regards to which typologies of open spaces and under what circumstances the reconfiguration of open space will be supported as part of a development proposal.
Grove Park Neighbourhood Forum	2	GR	In areas of major regeneration, where reconfiguration may be necessary, this should come about as part of a comprehensive and collaborative masterplanning process with the communities it is affecting. Emphasising this as a separate policy applied to all green spaces will not achieve sustainable development. Masterplanning areas of strategic regeneration will then ensure additional provision can be demonstrated fully, and commitment to deliver made in a timely and coordinated manner by legal agreements (e.g.s106), else will be a promise that never materialises.	Noted. The Local Plan includes site allocation policies for major strategic sites. Development on this site must be delivered in accordance with a masterplan, which must address provision of open space including the reconfiguration of existing open space where appropriate. The separate policy will provide parameters for individual proposals, including on smaller sites, which will need to be considered through the development management process.	No change.
HopCroft Neighbourhood Forum	2	GR	Protection plans have not been given the same level of consideration as the development plans. It is not enough to expect the developers to carry out ecological assessments and produce management plans as it is in their interests to do the minimum and avoid protection - the borough needs to robustly protect their sites	Noted. The approach set out in Part 2 policies GR1 and GR2 of Lewisham's Local Plan is consistent with the National Planning Policy Framework and adopted London Plan. Planning approval will be contingent on a development proposal demonstrating that the policy requirements will be satisfied. Planning conditions and/or legal agreements will be used to ensure Management Plans are delivered.	Local Plan updated to refer to requirement for ecological assessments to be undertaken by a chartered ecologist.

				The requirement for a suitably qualified ecologist/surveyor is considered appropriate; however the plan will be updated to specify 'chartered ecologist', to ensure professional standards are upheld.	
HopCroft Neighbourhood Forum	2	GR	Crofton Park Ward • Buckthorne Cutting Nature Reserve, Garthorne Road Nature Reserve, Duncombe HillGreen, Ewart Road Green and Crofton Park Railway Garden to be included as proposed Local Green Spaces • Buckthorne Cutting needs to be added to green space list. • New Cross to Forest Hill Railway needs to be included as a proposed MOL as it fits the criteria and is threatened in several places. • Buckthorne Cutting needs to be added as proposed LIG • Buckthorne Cutting needs to be added as proposed Area of Special Local Character	Noted. When adopted, the Neighbourhood Plan will form part of the development plan and sits alongside Lewisham's local plan. Decisions on planning applications will be made using both the local plan and the neighbourhood plan, and any other material considerations. Therefore, there is no need to repeat designations such as Local Green Space covered in the neighbourhood plan on the policies map for the Lewisham Local Plan . Following Regulation 18 Consultation, an Open Space Review and MOL Review Update (assessing additional sites for MOL designation) has been prepared to inform robust protections for open and green space within a clear hierarchy. In line with the Revised Site Assessments for London's Foundations (2021) report, the Regulation 19 document will include LIGS at Buckthorne Cutting and Old Gravel Pit, Blackheath.	Open Space policy amended to clarify that Local Green Space has the same level of protection as Metropolitan Open Land and Green Belt. In accordance with the Open Space Review and MOL Review Update, designations for following sites are: Forest Hill to New Cross Railway Cutting: Metropolitan Open Land Duncombe Hill Green: Strategic Open Space Ewart Road Green/Grove Close Green: Strategic Open Space Crofton Park Railway Garden: Strategic Open Space. Schedule 7 amended to reflect Buckthorne Cutting.

					Buckthorne Cutting designated as an Area of Special Local Characte
Lee Forum	2	GR	Greening has to also offer wildlife corridors and not be just planters and street trees. The connectivity of open spaces is vital to retaining wildlife as a presence in the urban settings.	Noted. The local plan applies the London Plan Policy on Urban Greening, which incorporates a range of measures such as green roofs and walls in addition to trees. Furthermore, the local plan seeks to ensure ecological corridors (another term for wildlife corridors) are enhanced and protected.	No change.
London Borough of Bromley	2	GR	The Green Infrastructure section of the draft Local Plan is supported. There is an opportunity for closer working with Bromley to build on the existing positive aspects of the All London Green Grid and South East London Green Chain to achieve a nature recovery network across boundaries. Sites such as Beckenham Place Park are ideal areas for strengthening partnership working with Lewisham and collaborating to achieve nature recovery across boundaries. Bromley is now signed up to the Nature Recovery Network programme led by Defra and Natural England.	Support noted. The Council will continue engage in partnership working with LB Bromely, including through the Duty to Cooperate process.	No change.
London Wildlife Trust	2	GR	Our comments are all on issues within our remit; biodiversity, landscape, green infrastructure & urban greening, access to nature, and climate resilience. They are within the context of the ambitions of both the National Planning Policy Framework (NPPF, 2019) and the London Plan (2021) to protect the natural environment and to seek to deliver gains for biodiversity wherever possible. This has been further strengthened by commitment to deliver Biodiversity Net Gain as a mandatory requirement through the NPPF through enactment of the Environment Bill currently passing through Parliament.	Noted. Responses to additional representations set out elsewhere in this Consultation Statement.	No change.
London Wildlife Trust	2	GR	Ecological networks and Sites of Importance for Nature Conservation The NPPF (para 174) requires local plans to map ecological networks to inform future planning delivery for example to protect and enhance existing ecological assets and/or create new ones. There is no evidence that an 'ecological network' currently forms part of this Plan, although we note Figures 10.1, 10.2, 10.7 and 10.8 provide some key elements of a future 'nature recovery network'. Such 'nature recovery networks' will form part of a Local Nature Recovery Strategy which the forthcoming Environment Act will be requiring public bodies (inc. local planning authorities) to prepare as set out in paras 95 and 96 of the current Bill in Parliament. This will underpin the spatial identification of where this network will be planned and delivered through the Local Plan and other relevant strategies. They should also aim to identify land that should not be	Noted. Policy G6 of the London Plan clarifies that the borough's ecological network comprises SINCs and ecological corridors. Although SINCs are mapped in the draft Local Plan, it recognised that ecological corridors require mapping to complete the borough's ecological network. The Regulation 19 document will map ecological corridors in accordance with strategic habitat corridors identified in figure 4 of the Re-survey of Sites of Importance for Nature Conservation (SINCs) in Lewisham 2016. The Council will prepare a Local Nature Recovery Strategy, which involves the mapping of nature recovery networks, when government and GLA guidance becomes available on these. The plan will be amended to reflect the Council's commitment to this.	Plan amended to include a map of the borough's ecological network, which illustrates the hierarchy of SINCs and ecological corridors. Local Plan amended to confirm Council's commitment to prepare a Local Nature Recovery Strategy.

			developed so as to enable this network to achieve its aims for nature's recovery, locally, regionally, and nationally.		
London Wildlife Trust	2	GR	**B. Local Plan Evidence base: Sites of Importance for Nature Conservation** We note the report of the SINC review produced by The Ecology Consultancy (2016).1 There are a few minor errors and missing information, partly due to the elapse of time, that we suggest are amended. Appendix 4: Updated and new citations Site M069 *Blackheath and Greenwich Park* • Site ownership (of part) refers to London Borough of Greenwich; it is now Royal Borough of Greenwich Site M122 *Forest Hill to New Cross Gate Railway Cutting* • Last para. A new nature reserve, Buckthorne Cutting, has been established , within the SINC, north of Garthorne Road NR, since the last survey. It also refers to "Brockley Nature Reserve" as managed by the London Wildlife Trust"; the site we manage is called New Cross Gate Cutting2 (the Brockley name was a temporary change, dropped over 12 years ago). The four nature reserves currently don't afford additional protection to the SINC, but their positive management helps to maintain as best possible the SINC's condition within their respective boundaries. We support the proposals for more – if not all - of this important corridor to be managed and protected as such. Site M135 *Beckenham Place Park (LNR)* • The proposed extension is outside of the statutory Local Nature Reserve. We suggest that (LNR) is removed from the SINC title, and clarity made in the citation as to the alignment of the LNR to the extension, unless the Council is intending to designate the expanded SINC as a LNR (see below). LeB03 *Downham Woodland Walk (LNR)* • Ditto in respect of the LNR, and as private land as indicated the extension is unlikely to become designated as such. LeL16 Eliot Bank Hedge and Tarleton Gardens Ownership referenced in the initial information is The Dulwich Estate (singular), and there's hesitancy in the final para about ownership, which should be clarified.	Noted. As the plan is progressed through the next stages of the process, the Council may take the opportunity to update these citations, subject to resources available.	Schedules in the Plan revised to remove Local Nature Reserve from the site name of SINCs and to include schedule of designated Local Nature Reserves.
London Wildlife Trust	2	GR	A number of other SINCs have had (LNR) added into the name as a proposed amendment; six in total. This is set out in the main SINC Report (section 4.8): "*It is proposed to rename seven existing SINCs to better reflect the habitats present*", but for the rest it is "*To include the statutory designated site within name*."	Noted. Although the SINC citations do not reference additional land designations, this will be clear from the planning policies map that has been prepared alongside the Regulation 19 Local Plan, which sets out land-use designations and their spatial extent.	No change.

			We suggest this is removed in all cases (i.e. not adopted), as it is unnecessary and potentially misleading, especially if boundaries differ. SINCs are a non-statutory designation, based on their intrinsic biodiversity quality, no matter ownership or land-use, whereas a Local Nature Reserve status is based on land-use and that the local authority has a legal interest in the land. Whilst many LNR boundaries align with SINCs, the majority don't (they are often smaller). The SINC citations should reference the additional land designations that it may be subject to in part or full (e.g. MOL, Conservation Area, Historic Park & Garden, LNR, etc.).		
London Wildlife Trust	2	GR	Just to be clear, we support the declaration of sites as Local Nature Reserves if they are of high quality and can be managed as such (and those listed here are). But we feel it is important to distinguish SINCs from their other designations (several SINCs in London are also designated as SSSIs) in a Local Plan.	Noted.	Schedules in the Plan revised to remove Local Nature Reserve from the site name of SINCs and to include schedule of designated Local Nature Reserves.
Make Lee Green	2	GR	**Action on Green Space** The Plan identifies the importance of green space for health and wellbeing. We agree that access to nature and shared open space should be a priority for this Plan. - New green space should be a mandatory requirement for any new development. The redevelopment of the Kidbrooke estate is a good example of how green space can significantly enhance new residential areas. - The Council should consider rewilding of existing green space and rivers to enhance biodiversity. - Community applications for street tree planting should be prioritised over car parking.	Noted. The draft Local Plan sets requirements for development proposals to provide for new or enhance existing open spaces, including in areas of identified deficiency. It also proposes that major development proposals meet the target Urban Greening Factor, in line with the London Plan. However it would be unreasonable to expect all development proposals to provide new green space (for example, proposals for shopfront signage and conversion of buildings). Part 2 Policy CI3 require developers to seek to increase opportunities for play and informal recreation, particularly in areas where there are identified deficiencies in provision. The Local Plan seeks that development proposals seek to naturalise existing or new green spaces. The Parks and Open Spaces Strategy also includes priorities around naturalisation, and will provide for enhancements which may not necessarily be delivered by new development. Tree planting in the public realm, whilst broadly supported, must not have an adverse impact on the highway network, including parking provision. A balanced approach will need to be taken, with impacts considered on a site by site basis.	No change.
	2	GR	5. The green space to the north of Eltham Road (behind the fire station and onward) could be created as permanent park land	Noted.	Local Plan amended to clarify the

			facilities for local residents to accommodate the development that does take place.		different typologies of open space within an open space hierarchy and the level of protection afforded to each. This include clarification between green open spaces and other open spaces (e.g. hardstanding but part of public realm).
	2	GR	Balancing any new buildings, the plan should also clearly state the importance of maintaining and developing substantial new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but highly valuable and well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces. Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	No change.
	2	GR	Balancing any new buildings, the plan should also clearly state the importance of maintaining and developing substantial new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but highly valuable and well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment.	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities. Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies. In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces.	No change.

				Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.	
Telegraph Hill Society	2	GR 01	Policy **GR1** and **§ 10.1** makes it clear that green infrastructure includes "*private residential gardens*" and allotments. **§ 10.3** makes clear the benefits that private gardens bring. We have seen estimates that the majority of trees across London are in private gardens. Recent research by the University of Bristoli, for example, has indicated that residential gardens are the source of 85% of the nectar produced in towns and cities and are therefore crucial in conserving the bee and butterfly population. If London is to be "*at least 50% green by 2050*" (plan page 355) then all proposals for building on gardens and allotments need to be resisted. The lack of reference to gardens should be rectified and this would support the protection that the Council is seeking to give in **QD11**. (paragraphs 184 to 197)	Noted. The draft Local Plan sets out policies which are considered to provide adequate protection for allotments and garden land. Policy GR1 recognises that garden land forms part of the network of green infrastructure, and policy QD11 provides further details for development affecting garden land. The Local Plan must be read as a whole for planning decisions.	No change.
	2	GR 01	The Local Plan refers to 're-shaping green spaces' – I have deep concerns about how this policy could be manipulated by developers at the expense of green spaces.	Noted. The approach adopted by the council is consistent with the NPPF 2021 especially paragraph 98-99. The policy is clear that the reconfiguration of open space will only be considered in exceptional circumstances specified in the policy, and only where there is not net loss of open space along with demonstrable improvements in the quality of open space. The Council considers this policy will provide flexibility for improvements to open space.	No change.
	2	GR 01	10.1 Include the concept of keeping wildlife corridors and habitats intact to prevent habitat fragmentation and allow for general migration northwards in global warming scenarios. A London project could include a green bridge (at Deptford) across the Urban Thames with a feed in of wildlife corridors in the south and dispersal to the north. This could potentially feed into the Habitats Regulations Assessment by AECOM. There is no specific mention of Brownfield sites as temporary sites or corridors (we may be heading for a post Covid/Brexit building crash so Hutchison Whampoa's Convoys may be further delayed). I suppose as Brownfield Sites are ephemeral they cannot be relied on to be sustainable, so developments should be stipulated to include Living Roofs to mitigate loss (and thereby can link in with the trans Thames bridge corridor above. 10.2 Does the £2.1Bn include the voluntary labour contribution role in Lewisham Biodiversity Partnership, QWAG, Green Gym, Park Friends Groups, FoBLC etc. who do wonders for social cohesion and mental health whilst representing great value for money in the efficacy of Lewisham's Ecological Regeneration department? 10.3 National Park City status can be met quicker if street trees are encouraged ('Street Trees for Living' was started by	Noted. The Local Plan seeks to protect and enhance ecological corridors (another term for wildlife ecological corridors).The Plan also seeks to ensure development proposals maximise opportunities for living roofs and tree planting on streets. The £2.1bn benefit accrued from green infrastructure was based on the Corporate Natural Capital Accounting (CNCA) developed by the Natural Capital Committee in its report to the UK Government. More detailed information on the methodology and framework can be located within Lewisham the Open Space Assessment 2020	Figure 10.1 amended to emphasize the river network. Plan revised to include the mapping of ecological corridors.

			dedicated volunteers in Brockley). Trees at the ends of gardens also provide privacy and noise reduction (from echoes between houses and nearby planes). P356 The map is not highlighting the three rivers enough as thicker blue lines, given that Lewisham is a terrain of valleys and hills. It is good to see the Baring Road railway embankments and Garthorne /Buckthorne Road cuttings are included in All London Green Grid Framework but not highlighted as Wildlife Corridors specifically) as they are particularly under threat from development.		
Blackheath Society no 2	2	GR 01	**GR1 Green infrastructure**. We consider that a suitably wide definition of 'green infrastructure' has been adopted, particularly as it includes both public and private space. Similarly, we welcome the ambitions set out in the plan, in particular as regards to increasing green space, access to it and increasing biodiversity.	Support noted.	No change.
Brockley Society	2	GR 01	Page 355, paragraph 10.3: We welcome the aim of making London a National Park City and would highlight the importance of minimising development in gardens and other green spaces to achieving that aim.	Support noted. The Local Plan makes provisions for the protection of garden land and other green spaces.	No change.
DNA	2	GR 01	**11 Green Space Protection** DNA asks the Council to designate 'Admiralty Square', 'Aragon Garden', the 'Greens to the east and west of Riverside Youth Club and 2000 Community Centre', the 'Woodland along Bailey Street' as well as 'Staunton Green' as **'Parks and Gardens'**. They were omitted from the Key Diagram for the Northern Sub Area and the mapping for open spaces is generally rather inconsistent. All of the evidence base on open spaces needs checking and updating in our view. Lewisham Council needs to avoid a second class publicly accessible less protected category of green spaces.	Noted. Parks and Gardens is a typology of open space based on functionality; it is not a planning policy designation. Following regulation 18 consultation, an Open Space Review has been prepared, which has resolved inconsistencies in open space mapping and informed robust open space designations within a clear hierarchy. All open spaces referenced in your response are proposed to be designated as strategic open space in the Regulation 19 version of the Plan.	In accordance with the Open Space Review the following sites have been designated strategic open space: Admiralty Square Aragon Garden Pepys Estate Green (East) Pepys Estate Green (West) Rainsborough Avenue Embankments Stauton Street Green North Area Key diagram revised to reflect update to open space mapping.
DNA	2	GR 01	**12 Off-setting and pooling | Investing in the public realm and social infrastructure off -site** **but in the Neighbourhood Plan Area**	Noted. The draft Local Plan has been prepared having regard to the strategic 'Good Growth' objectives and policies in the London Plan, as well as the principles of	No change.

			The Mayor of London aims through a whole raft of policies to improve London's natural capital including by making London a National Park City. **In practice this means making our neighbourhoods greener and wilder, carbon positive, more active and more social by significantly reducing and simplistically put the private cars taking up public spaces. DNA supports this greener and wilder, more active, resilient and affordable London with all the health and wellbeing benefits that are created while flood risks, as well as the acute climate and ecological emergencies are tackled.** ***"A green infrastructure approach requires a re-imagining of the public realm to consider how these places can make London greener, healthier and more resilient. Creative design solutions can allow even the more formal aspects of public space to be stitched into the wider ecological network of the city." Urban Greening for Biodiversity Net Gain: A Design Guide, Mayor of London , 2021*** DNA also recognises a disconnect between the identified multiple deficiencies in almost all categories of open and green space types in LBL's Parks and Open Space Strategy 2020 for the Neighbourhood Plan area, the projected population growth through already consented planning applications pre 2016 and lack of an up to date needs assessment of a full range of social infrastructure needs, including green spaces for the incoming population. Evelyn ward has already the highest population density in the borough, currently estimated at 12,607 people per square kilometer. In addition, detailed requirements set out in the London Plan 2021 and the Mayor's Homes for Londoners: Affordable Homes Programme 2021-2026 | Funding Guidance have set higher standards, much higher than those reached in the already consented development. It is therefore reasonable that the increase in population will further increase the multiple deficiencies in access to public green and open spaces, measured in sqm per person and distance, as these are finite. **Delivering and focusing the new standards on-site predominately for the benefit and use of the residents on that specific site is in our view an approach which does not reach optimal outcomes for the neighbourhood as a whole.** Ground level publicly accessible land is finite, hence the need for a coordinated approach making the best use of land is DNA's response to the given context. Policies aim to improve the quality of existing green and open spaces, maximise their health and well-being potential, their accessibility, including a greater focus on making streets and public spaces more attractive for pedestrians and cyclists and greener. This will assist in allowing the current and thousands of new residents and employees to make more healthy choices. Walking and cycling will also reduce traffic which as we know will improve poor air-quality – which has a negative compounding impact on health and wellbeing for whole population, especially children and youths and elderly. 64,000 people die every year as a result of air pollution, and now we have the [text removed]	sustainable development set out in the National Planning Policy Framework. It directly addresses topics referred in the representation, such as green infrastructure, carbon minimisation and neutrality, modal shift to sustainable travel modes, etc. Part 3 of the Local Plan sets out further sub-area specific spatial strategies and policies to support the delivery of the Local Plan, with a key focus on environmental and public realm improvements in the Deptford area. The Council has commissioned evidence base studies to inform the draft Local Plan, including Open Space Assessment, along with other key strategies such as Parks and Open Spaces and Playing Pitch Strategy. It considers that these studies are robust. Part 4 of the Local Plan addresses delivery, including funding via Planning Contributions and Community Infrastructure Levy. The Local Plan makes clear throughout that where planning obligations are necessary, these should be delivered on-site as a priority, however flexibility is provided to allow for pooled contributions to be re-invested in the local area. S106 agreements are required by law to be directly related to the impacts of a development proposals. The Council is also seeking to use CIL to support the delivery of infrastructure required to support the levels of growth planned over the long-term, and governance arrangements for Neighbourhood CIL have been adopted.	

			test case – urgent action improving the quality of air across the Borough and especially in parts of Deptford such as around Deptford Church Street, New Cross Road and Evelyn Street within the Dna Neighbourhood Plan Area. Positively planning for better links in the future via Convoys Wharf, the River Thames and Deptford high street, the expanding Cultural Quarter on Creekside and public transport hubs will support many of the Deptford Plan objectives if not all, directly and indirectly. The Deptford Green Links Policy (Map) addresses the need for better greener and open spaces, attractive, biodiverse and child friendly walking and cycling connections between major destinations. Deptford Links is a spatial framework for a network of public greened walking and cycle routes through the neighbourhood plan area and beyond. It builds on Lewisham's Parks and Open Spaces Strategy and the North Lewisham Links, Air Quality Management Areas and supports initiatives such as School Superzones and 'Daily Mile Initiatives'. Deptford Green Links provides a spatial priority framework to deliver better access to and between key destinations, having regard to consented and planned strategic development. Our approach, especially the policy initiatives for the **Deptford Green Links Network and Health and Wellbeing Hub Zones** provides a neighbourhood wide restorative spatial strategy to green and social infrastructure investment in public spaces. encouraging 'off-site in-neighbourhood' provision and pooling of planning requirements such as urban greening factor and biodiversity net gain, part of the play space provisions, sustainable urban drainage and to a lesser degree carbon offset units. This approach recognises the high levels of deprivation endured by the current population in the neighbourhood plan area and the already consented development resulting in an estimated 12000 to 15000 new residents over the next decade in the context of the acute climate, ecological and public finance emergencies. We ask the Council to support an 'off-site but ring-fenced neighbourhood' policy application to pooling of development related green infrastructure and carbon related planning requirements normally provided on-site. Also see UN Habitat report on need for cities to Green Up post Covid and increase biodiversity: https://news.un.org/en/story/2021/03/1088622		
Grove Park Neighbourhood Forum	2	GR 01	This policy should make a stronger link between GI and ecological corridors and nature recovery networks, so it also aligns to law and national policy.	Noted. Part 2 policies on Green Infrastructure recognise and seek to enhance the connected network of green infrastructure, including biodiversity sites. These are considered to be consistent with national and regional planning policy. However it is accepted that a reference to nature recovery could strengthen the strategic approach.	Local Plan policy GR3 amended to set out Council's commitment to prepare a Local Nature Recovery Strategy.

Grove Park Neighbourhood Forum	2	GR 01	This policy should emphasise that all development should contribute towards Lewisham's green grid, and a stronger emphasis on creating connections to enhance Lewisham's green grid.	Noted. Part 2 policies on Green Infrastructure recognise and seek to enhance the connected network of green infrastructure, including biodiversity sites. These are considered to be consistent with national and regional planning policy.	No change.
Grove Park Neighbourhood Forum	2	GR 01	Local links should also be mapped and celebrated, e.g. the Brockley Three Peaks trails and Quaggy River Links.	Noted.	Each sub area now includes a Lewisham Links Map which incorporates strategic green links, walking and cycling routes.
Grove Park Neighbourhood Forum	2	GR 01	How does the south east London Green Chain Walk fit in? This should also be mapped, to show the potential for making additional links into it.	The South East London Green Chain is a strategic green infrastructure network, and forms part of the Green Grid, identified in the Lewisham Local Plan and mapped in Fig 10.1. The South East London Green Chain will also be included on the planning polices map to accompany the regulation 19 version of the Plan. Policy GR2 requires development proposals to give priority to measures that will encourage walking, cycling and other active travel modes along routes that link open spaces such as the South East London Green Chain.	No change.
HopCroft Neighbourhood Forum	2	GR 01	**Policy GR1 – green infrastructure:** • Should make a stronger link between GI and ecological corridors and nature recovery networks, so it also aligns to law and national policy. • This policy should emphasise that all development should contribute towards Lewisham's green grid, and a stronger emphasis on creating connections to enhance Lewisham's green grid. • Fig 10.1 – Green Grid Framework. All GI should appear green including parks. Why only show the central spine as a strategic corridor? The Forest Hill to New Cross and South Circular to Chinbrook Meadows are also strategic green links and should be highlighted. • Local links should also be mapped and celebrated, e.g. Brockley Three Peaks trail. • How does the south east London Green Chain Walk fit in? This should also be mapped, to show the potential for making additional links into it.	Noted. Policies relating to ecological corridors are addressed under Biodiversity and Access to Nature. The Green Grid Framework map has been informed by the Mayor of London All London Green Grid (ALGG) Framework Supplementary Planning Guidance (SPG), and Lewisham features as ALGG Framework Area 6 – South East London Green Chain Plus. This SPG describes the importance of green infrastructure being delivered at a strategic sub-regional level and identifies strategic corridors and strategic links at a strategic sub-regional level. Strategic corridors and strategic links in the Green Grid Framework reflect those identified in the SPG mentioned above. Other green spaces have been coloured grey in order to emphasize the South East London Green Chain Plus Grid. Strategic green links at a local level, including Forest Hill to New Cross and South Circular to Chinbrook Park, have been	Figure 10.1 revised to include the South East London Green Chain Walk.

				addressed in part 3 of the plan under key diagrams and place principle policies for the sub-areas.	
London Wildlife Trust	2	GR 01	We welcome and support this policy. In the supporting text we recommend reference to the Government's 25-year Environment Plan and the London Environment Strategy (both 2018), which have a number of wide-ranging commitments and objectives this policy can meet. The reference to London National Park City status (para 10.3) could benefit from a definition, as the Trust is not clear as to how or by whom this status is evaluated and adopted (other than the Mayor of London announcing it so – we would like the Council to set some metrics about how its own progress could be measured).	Support noted.	Local Plan amended to include references in supporting text to key strategies, as suggested.
NHS (HUDU)	2	GR 01	**GR1 Green Infrastructure** We broadly support this policy, however, the approach should recognise that deprived areas tend to have lower levels of green infrastructure. Lewisham has higher than average levels of poor mental health, particularly serious mental health (PHE fingertips) and therefore greening urban areas, town centres, and the routes between these and residential areas is important	Support noted. The Local Plan seeks the protection and enhancement of open space and green infrastructure, with targeted measures to address areas that are deficient in access to open space and nature sites. This includes Policy GR2 and GR3.	No change.
Quaggy Waterway Action Group	2	GR 01	*A* "…. **Green infrastructure should be protected and opportunities taken to enhance provision** across the Borough, including by **enhancing or creating new links** between green infrastructure." **QWAG Comments:** QWAG supports this aspiration but the Plan is ambiguous with other policies and remarks suggesting that protecting and improving environment is too challenging in the face of development pressures. It is not clear that the Local Plan will result in a quality environment and that the Council will have the right policies and the practices embedded in its culture and skills to deliver.	Support noted. Draft Local Plan Policy GR1 provides a strategic policy for green infrastructure, which is supported by further detailed policies elsewhere in the plan. Planning Service resources are outside the scope of the Local Plan.	No change.
Quaggy Waterway Action Group	2	GR 01	B "Development proposals will be expected to investigate and **maximise opportunities for enhancing existing green infrastructure and creating new provision on site** through the design-led approach." **QWAG Comments:** QWAG would support development that is a significant step up from what the borough has been subjected to in the past decade. But it remains unclear that the Local Plan will lead to the required step change in development quality, while the only certainty is that a large amount of development of indeterminate merit will be imposed.	Support noted. The Local Plan, once adopted, will form part of the Council's statutory development plan and used for planning decisions.	No change.
South East London Labour for a Green New Deal	2	GR 01	The London Plan has a target for London to be 50% green by 2050 and Lewisham will play a part in this. People want stronger protection for the natural environment; protecting wildlife and giving spaces where it can flourish – pollinators, butterflies, and insects, birds and small beneficial mammals. There must be tough standards and enforcement on greening standards for developers, some of whom have a track record of trying to avoid responsibility and cost.	Noted. The draft Local Plan will help give effect to the London Plan, and includes the local policy framework to support nature conservation and enhancement. The draft plan includes a new Urban Greening Factor policy, which sets a standard for greening on qualifying developments. Planning enforcement is outside the scope of the Local Plan.	No change.

Telegraph Hill Society	2	GR 01	We are pleased that the Council recognises the advantages of back gardens in policy **QD11** (although its protection for other garden space should go further). However, there is little mention in this section of garden space, despite garden space contributing heavily to our green infrastructure and the aspirations for a greener city.	Noted. Draft Local Plan Policy GR 01 sets out that garden land forms part of the Borough's network of green infrastructure.	No change.
Telegraph Hill Society	2	GR 01	There is considerable research (refer to paragraph 117 et. seq. above) that private garden space brings significant benefits to residents. In addition to contributing to urban greening, it provides space where children can safely play whilst the parents are working in the house (a factor found important during the COVID-19 pandemic and which will become increasingly important if homeworking continues as a trend), a more secure relaxation space for adults than can be provided in public open space and also the capacity for food growing (see our comments on **GR5** below).	Noted. Draft Local Plan Policy GR 01 sets out that garden land forms part of the Borough's network of green infrastructure. Policy QD11 also recognises the role of back gardens and provides policy protection for this type of land.	No change.
Telegraph Hill Society	2	GR 01	We consider that the proposed Plan needs to explain the place of gardens as part of the green infrastructure and to promote the benefit of private garden space within new developments as well as public garden space.	Noted. Draft Local Plan Policy GR 01 sets out that garden land forms part of the Borough's network of green infrastructure. In addition, the draft Local Plan proposes to apply the London Plan housing standards, including for indoor and outdoor amenity space.	No change.
Telegraph Hill Society	2	GR 01	As we have noted elsewhere, there is considerable confusion throughout this section, including **figures 10.4 and 10.5** as to "open space" and "green space". The section needs reconsidering as to where each of these terms is appropriate. In general, there is no justification for referring to "open space" in a policy section on "green infrastructure".	Noted. Following regulation 18 consultation, an Open Space review has been prepared which has informed how the different typologies of open space such as park and gardens and allotments and community gardens are afforded protection in the regulation 19 version.	Local Plan amended to clarify the different typologies of open space within an open space hierarchy and the level of protection afforded to each. This include clarification between green open spaces and other open spaces (e.g. hardstanding but part of public realm).
The St John's Society	2	GR 01	Open space should not be synonymous with green space. Distinction needs to be made. There needs to be a change in how 'open space' is planned, designed, and delivered – more planted/green space as opposed to hard/paved space where possible/practical.	Noted. The term open space is applied in the London Plan Policy G4 and includes a variety of typologies from Parks and Gardens to Cemeteries - which provides for green space - based on their primary function. However, it is acknowledged the Local Plan should provide greater on what is meant by open space, the level of protection afforded to different types of open spaces, and that the	Local Plan amended to clarify the different typologies of open space within an open space hierarchy

				creation of green space should be prioritized in the creation of new publicly accessible open space. Local Plan's policy on urban greening seeks to ensure new open space delivered as part of development proposal includes urban greening measures.	and the level of protection afforded to each. This include clarification between green open spaces and other open spaces (e.g. hardstanding but part of public realm).
Sport England	2	GR 02	GR2 Open space and Lewisham's green grid This policy also refers to outdoor leisure facilities. It is unclear whether sport facilities such as playing fields are included in this. This should be clarified, as, should this be the case, it would not comply with the London Plan and NPPF as outlined above.	Noted.	Local Plan amended to make clear that outdoor leisure facilities are considered as open space. Additional amendments made to ensure policies on sports and recreational land are in conformity with the London Plan and national policy, including London Plan Policy S5.
	2	GR 02	The Stables Site does not appear to be listed as being a SINC or a nature reserve in the Local Plan. It needs clear designation in order to protect it from development and maintain the green corridor.	The Stables Site (Former Pink Willow Equestrian Centre) falls within the boundary of Hither Green Sidings SINC. The site is also designated as Metropolitan Open Land which is afforded to the same level of protection as Green Belt.	No change.
	2	GR 02	SCHOOLS AND PLAYING FIELDS: It is clear that children need phenomenally more exercise than they are now getting in their schools. Playing fields are therefore not a luxury but a necessity and it should be totally forbidden for schools to sell any at all. It should be considered a crime. Children should have a longer day at school, so they could have a minimum of 50 minutes sports activities EVERY SINGLE DAY!	Noted. The Local Plan responds to evidence which indicates issues with childhood obesity levels in Lewisham. It broadly seeks to ensure that children and young people are provided with more opportunities for play and informal recreation as part of the integrated approach to improve public health and wellbeing. The Local Plan has includes policies to ensure that playing fields and other open/green spaces are protected.	No change.

				Part 2 Policy CI3 requires developers to seek to increase opportunities for play and informal recreation, particularly in areas where there are identified deficiencies in provision. School hours are outside the scope of the Local Plan.	
	2	GR 02	It's shocking that plan lists no aspiration for any new parks or nature reserves anywhere in the borough, especially in the north/ west where access is limited.	Disagree. Part 2 Policy GR1 and GR2 supports the delivery of new or enhancement of existing open spaces and green infrastructure across the borough. The Local Plan includes targeted measures to address areas that are deficient in access to open space and nature sites. This includes Policy GR2 and GR3. In addition, the site allocations included in Part 3 of the Local Plan include requirements for the provision of new publicly accessible open and green space.	No change.
	2	GR 02	P359 10.4 Good to see acknowledgement that Waterways contribute to the Borough's character. Open spaces also provide opportunities for volunteering, socialising and cross generation communication. The (usually) annual 3Rivers Clean Up is well attended and shows how people care about their environment, including London Mayor Boris Johnson in the River Pool a few years back as he pulled the invasive Himalayan Balsam. The importance of MOL's resistance to development is particularly important in the Grove Park Neighbourhood Plan (re Wimpey at the back of the Ringway Centre) and the Crofton Park railway cutting area (re Courtrai Road Scout Hut). MOL which is not necessarily accessible (such as railway corridors) play an important part in Wildlife Corridor and habitat stability so should not be fragmented or influenced unduly by any development within or outside its boundaries. 10.5 Where developments allow there should be open public access to large living roofs (see IKEA in Greenwich). If they are inaccessible, such as wide expanses of roofs in industrial/commercial estates they can be deemed as visual open space as seen from above (maybe an adjacent office or residential tower block) and should be retrofitted or built with Living Roofs to give resident or office workers better views and to help with mental health (in terms of Biophylia) and contribute to wildlife corridors as well as other benefits such as rainwater slow down into sewers, insulation etc.. Provisions for improving public access and use should be of high quality. Cornmill Gardens' riparian decking platforms needed to be better built as they rotted relatively quickly.	Noted. The draft Local Plan seeks to ensure that development proposals within or adjacent to ecological corridors (another term for wildlife corridors) protect and enhance the nature conservation value of the site. Furthermore, the rear of Ringway Gardens is designated as Metropolitan Open Land which afforded the same level of protection as Green Belt. Policy QD2 of the draft Local Plan expects development proposals to have regard to 'Secured by Design' principles which help to reduce crime and improve perceptions of safety. The draft local plan does not preclude educational opportunities within open space providing they are of an ancillary use that helps improve the quality of open space and promote access to a wide range of users and meet the criteria set out in part E of policy GR2. The Council will seek planning obligations on a case-by-case basis having regard to the relevant policy requirements of the statutory Development Plan, development specific impacts, appropriate mitigation (including additional facilities or requirements made necessary by the development), viability and the statutory tests for the use of planning obligations. Green Belt, Local Green Space and Metropolitan Open Land have equivalent protections. As the plan is progressed through the next stages of the process, the Council may take the opportunity to update photos, subject to resources available.	In accordance with Metropolitan Open Land Review Additional Sites Report, Buckthorne Cutting including the Scout Hut has been designated as MOL. Paragraph 10.9 of the supporting text amended as suggested.

			There is no mention of educational opportunities provision within open space. The decking platforms at Cornmill Gardens were meant to serve Lewisham Bridge school but not enough teachers utilised the resource and there was no pressure as a result for upkeep. The Field Studies Council now has a successful non residential base in the Homesteads in Beckenham Place Park which will increase use and stewardship amongst the young. Any development should put funds aside to create a maintained 'outdoor classroom' in a local park or in its own landscape near points of interest (river etc.) for the use of local schools, scout groups etc. A simple 'outdoor classroom' which can accommodate a class or group of children can instil a respect for nature in the next generation. There is no mention of increasing personal safety by Designing Out Crime in new open spaces. Cornmill Gardens and the Northern part of Ladywell Fields were transformed (via the QUERCUS project) with EU Life funding, one of the main criteria of change being Designing out Crime to encourage more use. It is widely acknowledged to have succeeded. QUERCUS produced a toolkit which should be referred to. Lewisham was the lead agency in it and earned a lot of respect. BDP designed Cornmill Gardens won the London Best New Public Space Award in 2009. There is no mention of art opportunities (specified on P103) either. There is a silver sculpture in the Ravensbourne in the Catford section which was a surprise to QWAG, Lewisham Biodiversity Partnership and the Environment Agency (as it had the potential to increase flood risk). There was no funding for maintenance so Glendale or volunteers had to clear the debris). 10.6 'Open Space' can be hard standing as QWAG argued against in SRB6/Urban Renaissance in Lewisham/NewLewisham where St Stephen's Square had lollipop non-native trees amongst the extensive paving. The hard standing in the Catford end of Ladywell Fields was specifically designed as a Catford Market/Event Space (but organisers prefer the remoter Ladywell end as toilets are present (refer to para 5.25 P105). New developments should include (funded) maintained and fully accessible toilet facilities added to local parks to serve the new residents and others (the plumbing integrating into that of the newbuild. It should have happened in Barratt's Catford Green development that charges a premium for private flats overlooking a park they did nothing to improve. In providing for sports (and as result fitness) there is a danger that open green spaces become 'sportified'. The Arena in Ladywell Fields is now not wholly public accessible in what was open green space. Banatynes in Grove Park (Borough Boundary	Sites with planning consent are outside the scope of the Local Plan.	

			was moved from the Quaggy river to be included in more laissez-faire Bromley where no-one would object (Lewisham residents in Grove Park were sidelined albeit traffic increased and no cycle parking included - for 'fit' people!). See map on P360 for notch. The page has another image of Ladywell Fields from the Catford corner, still missing out the river that people gaze at and enjoy. P361 10.7 There is an art levy (CIL or S106?) for big developments I believe and I have seen proposals for 'audio sculptures' outside the main police station to 'listen to' the Quaggy below the Lewisham High St high pavement. Once again LBP or QWAG have not been consulted and we would advise these should be functional arty structures (such as grills or glass blocks) to allow air/light into the dark tunnel to facilitate birds' migration and educate the public as to the existence of the lost river beneath. No doubt they shall suddenly appear as thousands of pounds are wasted on a lost opportunity. QWAG have it in mind to improve the public realm by 'daylighting' the Quaggy there anyway using S106 monies from the original SRB6 funding to improve the functionality and amenity of that deficient area. The new Confluence Park is a success at the moment but will soon be overshadowed by the next phases of development. It is a great improvement on the (award winning in less aware days) amphitheatre like Quaggy Gardens and is appreciated by the new local residents. 10.8 No doubt this is referring to the rearrangement of MOL in NewLewisham to replace the driven over Charlottenberg Gardens with the Confluence Park. The former was a green desert that was formerly a Safeway, stored the Chiesmans' Bridge and was an ugly hoarding site until [name removed] got it grassed over and it unwittingly became designated as MOL (I remember that). The danger is that the developers have engaged a security and maintenance company to keep it looking pretty (despite that I have personally removed graffiti and substantial litter from the river and banks - see Love Clean Streets as I am a 'Streetleader no 749)' and it is not technically accessible 24/7 to the public. Muse's refusal to provide a bridge across the confluence showed they were not interested in providing an alternative more pleasant route out of the station towards Lee as commuter/user numbers inevitably increase. 10:9 The second sentence re the ALGG should end with 'supporting sustainable communities of humans and wildlife'! (The ALGG specifies 'for the benefit of people and wildlife').		

			10:10 Re the acronym NPPF please add 'See P17'. As some people do not read from the beginning. Which has more protection? Green Belt, Local Green Space or MOL with respect to development issues in Grove Park or Duncombe Hill Green? P363 The image of BPP and the restored lake just missed the tiny river (tributary to the Ravensbourne) feeding the lake.		
	2 2	GR 02 Figure 10.2	The open space map within the document fails to show which open spaces are protected as MOL, Green Chain or SINC designations. The map is therefore pretty inadequate and meaningless unless the Draft Proposals clearly affirm that the existing map and land designations remain in force.	Noted.	A Policies Map has been prepared and sits alongside the Regulation 19 Local Plan document. This clearly sets out land-use designations and their spatial extent.
Blackheath Society no 2	2	GR 02	**GR2 Open spaces and Lewisham's green grid**. We support the policy of protecting open space from inappropriate development and resisting its loss. It should be made clear in the policy that open space with hard surfaces is not of equal environmental value and public benefit to open green spaces (including water), and that provision and maintenance of trees will add further value to open space. We support any attempts to increase open space in areas of deficiency, especially green space.	Noted.	Local Plan amended to clarify the different typologies of open space within an open space hierarchy and the level of protection afforded to each. This include clarification between green open spaces and other open spaces (e.g. hardstanding but part of public realm).
Climate Action Lewisham	2	GR 02	Additionally, policy GR2A Page 357(A) references "inappropriate" developments but fails to define what that means in this instance. Such loose wording will undoubtedly be exploited and must be rewritten to account for loopholes and misappropriation.	Agreed.	Local Plan Policy GR2 amended to provide more clarity around inappropriate development.
Climate Action Lewisham	2	GR 02	We welcome policy GR2H Neighbourhood forums and their contributions in identifying 'appropriate sites to designate as Local Green Space in neighbourhood development plans'. However, page 361(10.10) states that 'It is recommended that	Noted. The Council has a statutory duty to support neighbourhood forums, and the nature of this support is explained further in the Government's National Planning Practice Guidance. For open space, the Council may assist in	No change.

			all such assessments apply a robust methodology and are published as part of the technical evidence base'. We would like further clarification on how forums will be supported in this process. The plan states that forum activity will be encouraged but not by what means or to what degree. In the interests of inclusion, diversity and representation, forum facilitation must be proactive and sincere.	sharing evidence base documents, signposting good practice guidance and providing policy and plan-making advice. The Council has and will continue to carry out its statutory functions for neighbourhood planning.	
Deptford Society	2	GR 02	**Page 357** 'All major developments will be expected to incorporate publicly accessible open space unless it can be clearly demonstrated that this is not feasible.' This is too open to exploitation when taking into account new developments in the north of the borough. New developments in areas already deficient in green space should have an absolute requirement to deliver new strategic green space (Albany/Creekside).	Noted. It is considered that Part 2 Policy GR2 provides a robust policy framework for the delivery new or enhancement of existing green infrastructure network. The Local Plan makes clear that major developments in areas of open space deficiency must contribute to new provision. In exceptional circumstances, where it is demonstrated that new open space cannot be delivered on site for reasons of feasibility, the Council will seek a financial contribution towards the provision of open space in the local area. However, it is recognised that the policy would benefit from more authoritative language.	Local Plan amended to provide more authoritative language where possible. For example, by stating that development proposals "must" rather than "will be expected to".
Environment Agency	2	GR 02 Figure 10.1 and 10.2	**River network** We recommend adding the river network to the following maps to show the important role of river corridors across the borough in delivering the green grid and open spaces policies. Page 356 - Figure 10.1 – Green Grid Page 360 – Figure 10.2 – Open spaces	Noted.	The local plan has amended its open space and green grid maps to reflect river network.
Greater London Authority	2	GR 02 Policies map	**Metropolitan Open Land (MOL)** The release of four parcels of land amounting to a total of 0.77 ha of MOL is proposed (Metropolitan Open Land Review 2020) – 0.4 ha for realignment of the South Circular and strengthening of the boundary and 0.37 ha around Lewisham Gateway, with the identified sites performing poorly against MOL criteria. Following London Plan Policy G3(C) exceptional circumstances must be demonstrated convincingly to justify these changes.	Noted.	A Technical Paper has been prepared which addresses the exceptional circumstances for the approach taken in the Local Plan. This will be published as part of the Local Plan evidence base.
Grove Park Neighbourhood Forum	2	GR 02	**Fig 10.1 – Green Grid Framework.** Why grey out the main parks if they are a key part of the green grid? They are key destinations in a green grid and all GI should appear green. Why only show the central spine as a strategic corridor? How about the Forest Hill to New Cross and South Circular to Chinbrook Meadows strategic green links? Both are strategic to Lewisham and should be highlighted.	Noted. The Green Grid Framework map has been informed by the Mayor of London All London Green Grid (ALGG) Framework Supplementary Planning Guidance (SPG), and Lewisham features as ALGG Framework Area 6 – South East London Green Chain Plus. This SPG describes the importance of green infrastructure being delivered at a strategic sub-regional level and identifies strategic corridors and strategic links at a strategic sub-regional level.	No change.

				Strategic corridors and strategic links in the Green Grid Framework reflect those identified in the SPG mentioned above. Other green spaces have been coloured grey in order to emphasize the South East London Green Chain Plus Grid. Strategic green links at a local level, including Forest Hill to New Cross and South Circular to Chinbrook Park, have been addressed in part 3 of the plan under key diagrams and place principle policies for the sub-areas.	
Grove Park Neighbourhood Forum	2	GR 02	Policy GR2 states that open spaces will be protected from inappropriate development, suggesting it will consider some development appropriate. The explanation section should make it crystal clear what it considers inappropriate development upfront in the opening paragraph. The policy wording would be better worded as all open spaces should be safeguarded and protected giving a clear message that they are important and are to be protected.	Noted. The policy is intended to provide protection for green and open spaces. However some types of development may be appropriate within open spaces where they supports the quality or function of the open space (for example, public toilets, facilities for sport and recreation). In addition, the NPPF sets out provisions around inappropriate development in Green Belt and MOL.	Local Plan Policy GR2 amended to provide more clarity around inappropriate development.
Grove Park Neighbourhood Forum	2	GR 02	Clause C states it 'will strongly resist', however, this is a get out clause, and should state will be refuse. The clause already gives some flexibility through 'exceptional circumstances'.	Noted. The policy provision sets out in Part 2 Policy GR2 of the draft Local Plan is considered to be consistent with the NPPF (2021) paragraph 98-99 and the London Plan 2021. The exceptional circumstances test is set out in the policy clause. The policy provides flexibility to deliver open space enhancements in the local area, and will not result in the net loss of open space.	No change.
Grove Park Neighbourhood Forum	2	GR 02	The explanatory text states that there are also MOL which are designated through the London Plan, but in truth it is the Local Plan through its review process that puts these forward, and so these MUST be highlighted and a policy statement must be included to state it will not accept development on MOL, in line with regional and national policy.	Noted. The Council has reviewed open space designations through the plan process, and the proposals for any changes are set out in the Local Plan, which will be subject to examination.	Policy amended to make clear that MOL is treated as Green Belt in policy terms.
Grove Park Neighbourhood Forum	2	GR 02	Clause D is an open invitation for developers to buy up green spaces and cut away at the edges. This should be deleted, as it goes against national policy to protect green spaces.	Noted. The approach is considered to be consistent with the NPPF 2021 especially paragraph 98-99. The policy is clear that the reconfiguration of open space will only be considered in exceptional circumstances specified in the policy, and only where there is not net loss of open space along with demonstrable improvements in the quality of open space. The Council considers this policy will provide flexibility for improvements to open space.	No change.
Grove Park Neighbourhood Forum	2	GR 02	**Fig 10.2 Open Spaces.** This map is trying to mix difference classifications of Open Space, i.e. land cover description vs functional description. It needs to be clearer and only describe a functional description and have a separate map to show the policy designations.	Noted.	A new policies map has been prepared. This clearly sets out the spatial extent of different land-use designations, including for

					open space, in the Local Plan.
Grove Park Neighbourhood Forum	2	GR 02	Need to make clearer which open spaces relate to GR1 and GR2. If all green space is to be protected equally, then make everything one colour and say it is all designated as protected open space. At the moment it is hard to understand what is protected and what isn't.	Noted.	A new policies map has been prepared. This clearly sets out the spatial extent of different land-use designations, including for open space ~~in~~, in the Local Plan.
Grove Park Neighbourhood Forum	2	GR 02	**Fig 10.2 Open Spaces.** Additionally, why does this map show some spaces as natural green spaces and others as green corridors when they are similar in function and character? What is the logic behind this categorisation? Why are Garthorne/Devonshire/Vesta Road nature reserves natural green spaces and Buckthorne cutting Nature Reserve not so?	Noted. Following the Regulation 18 Consultation, an Open Space Review has been prepared, which has resolved inconsistencies in typologies given to open spaces.	In accordance with the Open Space Review, Figure 10.2 has been revised to show Buckthorne Cutting as a Natural and Semi-natural Urban Greenspace.
Grove Park Neighbourhood Forum	2	GR 02	Why aren't the policy designations shown? E.g. MOL and Local Green Spaces must also be mapped, as the Local Plan must protect these and show upfront which sites have such designations.	Noted. When adopted, the Neighbourhood Plan will form part of the development plan and sits alongside Lewisham's local plan. Decisions on planning applications will be made using both the local plan and the neighbourhood plan, and any other material considerations. Therefore, there is no need to repeat designations such as Local Green Space covered in the neighbourhood plan on the policies map for the Lewisham Local Plan.	A new policies map has been prepared. This clearly sets out the spatial extent of different land-use designations, including MOL, in the Local Plan.
Grove Park Neighbourhood Forum	2	GR 02	Fig 10.3 should also include LGS, as it has same protections as MOL/Green Belt. The NPPF clearly states that Local Plans can put forward LGS designations. A number of these have been mapped via neighbourhood plans.	Noted. The NPPF provides scope for neighbourhood forums to designate Local Green Space through the neighbourhood plan process. Neighbourhood forums are well placed to identify high quality green spaces that are valued by the local community and whose protection will help deliver the Local Plan objectives. Therefore, Local Green Space designations identified through neighbourhood plans do not have to be repeated in Local Plans in order to carry weight.	Open Space policy amended to clarify that Local Green Space has the same level of protection as Metropolitan Open Land and Green Belt.

HopCroft Neighbourhood Forum	2	GR 02	Green Infrastructure: The council has included a policy allowing the reconfiguring of open spaces. This is a concerning precedent that could be taken advantage of by developers. "*If we should allow some open spaces to be re-shaped to improve their quality (with no overall loss of space) or not provide such flexibility.* *Making changes to the boundaries of spaces, or to their status as open spaces/ sites of importance for nature conservation, drawing on our studies*."	Noted. The approach is considered to be consistent with the NPPF 2021 especially paragraph 98-99. The policy is clear that the reconfiguration of open space will only be considered in exceptional circumstances specified in the policy, and only where there is not net loss of open space along with demonstrable improvements in the quality of open space. The Council considers this policy will provide flexibility for improvements to open space.	No change.
HopCroft Neighbourhood Forum	2	GR 02	GR2 states that open spaces will be protected from inappropriate development, suggesting it will consider some development appropriate. The explanation section should make it clear what it considers inappropriate development. The policy wording needs to give a clear message they are important and are to be protected.	Noted. The policy is intended to provide protection for green and open spaces. However some types of development may be appropriate within open spaces where they support the quality or function of the open space (for example, public toilets, facilities for sport and recreation). In addition, the NPPF sets out provisions around inappropriate development in Green Belt and MOL.	Local Plan Policy GR2 amended to provide more clarity around inappropriate development.
HopCroft Neighbourhood Forum	2	GR 02	Clause C states it '*will strongly resist'*, but does not say it '*will refuse*' giving some leniency through 'exceptional circumstances' (an unspecified criteria).	Noted.	Local Plan amended to provide more authoritative language where possible. For example, by stating that development proposals "must" rather than "should" or "will be expected to"; and replacing "will be resisted" with "refused".
HopCroft Neighbourhood Forum	2	GR 02	The explanatory text states that there are also MOL which are designated through the London Plan, but in truth it is the Local Plan through its review process that puts these forward, and so these MUST be highlighted and a policy statement must state it will not accept development on MOL, in line with regional and national policy.	Noted. The Council has reviewed open space designations through the plan process, and the proposals for any changes are set out in the Local Plan, which will be subject to examination.	Open Space policy amended to clarify that Local Green Space has the same level of protection as Metropolitan Open Land and Green Belt.
HopCroft Neighbourhood Forum	2	GR 02	Clause D is an open invitation for developers to buy green spaces and cut away at the edges. If it's allowed, it must only come about as part of major masterplanning in areas of strategic regeneration, where additional provision can be demonstrated fully, and commitment made through policy to	Noted. The approach is considered to be consistent with the NPPF 2021 especially paragraph 98-99. The policy is clear that the reconfiguration of open space will only be considered in exceptional circumstances specified in the policy, and only where there is not net loss of open space	No change.

			ensure open spaces are delivered as part of a comprehensive master planning approach.	along with demonstrable improvements in the quality of open space. The Council considers this policy will provide flexibility for improvements to open space.	
HopCroft Neighbourhood Forum	2	GR 02	Need to make clearer which open spaces relate to GR1 and GR2. If all green space is to be protected equally, then make everything one colour and say it is all designated as protected open space. At the moment it is hard to understand what is protected and what isn't. Why are Garthorne/Devonshire/Vesta Road nature reserves natural green spaces and Buckthorne cutting Nature Reserve not so?	Noted. Following the Regulation 18 Consultation, an Open Space Review and an update to the Metropolitan Open Land Review has been prepared to inform open space designations within a clear hierarchy.	A new policies map has been prepared. This clearly sets out the spatial extent of different land-use designations, including for open spaces, in the Local Plan. Figure 10.2 amended to show Buckthorne Cutting as a Natural Green Space
HopCroft Neighbourhood Forum	2	GR 02	Why aren't the policy designations shown? E.g. MOL and Local Green Spaces must also be mapped, as the Local Plan must protect these and demonstrate which sites have such designations.	Noted.	A new policies map has been prepared. This clearly sets out the spatial extent of different land-use designations, including for open space, in the Local Plan
HopCroft Neighbourhood Forum	2	GR 02	Fig 10.3 should also include LGS, as it has same protections as MOL/Green Belt.	Noted. Neighbourhood forums are well placed to identify high quality green spaces that are valued by the local community and whose protection will help deliver the Local Plan objectives. Local Green Space designations identified through neighbourhood plans do not have to be repeated in local plans to carry weight.	Open Space policy amended to clarify that Local Green Space has the same level of protection as Metropolitan Open Land and Green Belt.
Lee Manor Society	2	GR 02 Figure 10.2	**The green corridor** of East Lewisham. Much is made of the green corridor that runs from Blackheath in the north through Lee Green to Grove Park in the south. But the map of Lewisham's green spaces p362 shows no evidence of this green corridor. Between the larger areas of green space in this	Noted. Following regulation 18 consultation feedback, an Open Space Review has been prepared which captured omitted open spaces including green corridors. A green corridor that runs from Blackheath through Grove Park	No change.

		LEA	corridor (presumable including Northbrook Park and Chinbrook Meadows) there are smaller areas of green space, often fronting council-managed housing. These need to be identified and managed appropriately (this means more than regular grass mowing). Some of these green spaces could be allowed to revert to meadow with mowing restricted to the edges next to paths and pavements. In addition, there are avenues of mature trees, notably in Burnt Ash Road, that also need management and protection. The expansion of a Controlled Parking Zone to the east of Burnt Ash Road should include a ban on parking under the tree avenue in Burnt Ash Road between Leegate and Dorville Road. This is compacting soil and risks damaging the trees. We question why street trees, which form a vital element in the greening of the borough, are only referred to in the context of building redevelopment (p359). While it is important for landscaping to be included in new developments the council needs to have a policy for maintaining and increasing its street trees. Its performance to date has been lamentable.	could not be identified; road verges are not considered to be green corridors. The maintenance of existing residential gardens and informal amenity green spaces in and around housing estates is generally outside the scope of the Local Plan. However, for new major developments the draft Local Plan includes requirements to ensure that satisfactory arrangements are made for the maintenance and management of the public realm. Controlled Parking Zones are outside the scope of the Local Plan.	
Lee Manor Society	2	GR 02	We support the proposal for the extension of the **Green Chain Walk**. It could include Manor House Gardens and Manor Park en route to Lewisham Park and Hilly Fields.	Noted. The Green Chain Walk is designated by the London Plan however development proposals where possible will be expected to improve access to the Green Chain Walk.	No change.
London Wildlife Trust	2	GR 02	We welcome and support this policy. In Figure 10.2, we are curious as to why Blackheath is designated a natural green space, whilst Beckenham Place Park (which holds most of the borough's ancient woodland) isn't.	Noted. Figure 10.2 sets out the typologies of open spaces based on their primary function; they are not open space designations in themselves. Beckenham Place Park and Blackheath Common are both designated as Metropolitan Open Land which has the same level of protection as Green Belt.	Figure 10.2 amended to include Parks and Gardens typology and reflect revised typologies as indicated in the Open Space Review.
Port of London Authority	2	GR 02	**5. Policy GR2: Open space and Lewisham's Green Grid.** Support the aims of the Green infrastructure section of the Local Plan, including to enhance the quality of the boroughs waterways, such as the Rivers Thames and Ravensbourne, and to improve walking and cycle routes, such as the Thames Path. Support the reference in policy GR2 that development proposals will be expected to maintain and enhance Lewisham's network of open spaces, including by improving access to and connectivity between these spaces, including to and along the Thames Path.	Support noted.	No change.
Quaggy Waterway Action Group	2	GR 02 Page 350 Main Issues	"National park city - The draft London Plan aspires for London to be a National Park City, and at least 50 per cent green by 2050 - Lewisham will have to play its part." **QWAG Comments:** London is already a National Park City. The question is: how is Lewisham contributing now to increase and improve the quality, quality and accessibility of green and blue space? That is not clear from the Plan because it does not properly address	Noted. The draft Local Plan sets out a range of measures addressing the protection and enhancement of open spaces and waterways, along with nature conservation. The Borough-wide policies are set out in Part 2 in the Green Infrastructure and Sustainable Design and Infrastructure sections, which are also supported by the sub-area policies and site allocations in Part 3.	Local Plan amended to reflect that London is a National Park City.

			ecological function and environmental quality because of the focus on how to fit in more physical development at the expense of green and blue space.		
Quaggy Waterway Action Group	2	GR 02 Page 350 Main Issues	"Biodiversity and nature - The council is now required to ensure the Local Plan delivers net gains in biodiversity." **QWAG Comments:** Under the Environment Bill (Act), local planning authorities will have to implement Biodiversity Net Gain, which is based on the theory that new housing will create / support more nature and biodiversity than might be lost when development occurs. That is the theory, but it is not at all clear that it will work and that, taken together, all of the development schemes subject to Biodiversity Net Gain will be ecologically coherent. That is just one reason why it is important that the Council and the Local Plan do not over rely on Biodiversity Net Gain, which should certainly not be regarded as a main way to deliver nature conservation and ecological restoration. There are environmental deficiencies including in ecosystems and their function which reliance on Biodiversity Net Gain will not address, and the Plan and the Council must be clear on where Biodiversity Net Gain will be used and where other more suitable measures will still be deployed and given proper priority. There are many risks with Biodiversity Net Gain not least: the lack of skills and capacity within the Council to make good, well evidenced decisions; the reliance on partial assessments from developers and their agents; the risk that measures which are put in failing to deliver for biodiversity for whatever reason (from inappropriate planning to poor aftercare). There is also considerable risk with Biodiversity Net Gain that any new green space or natural features which are created to compensate for losses are located far away. The Local Plan should be very clear about any losses being 'compensated' for within the locality.	Noted. The Council will seek to develop a Local Nature Recovery Strategy and a system for delivering mandatory Biodiversity Net Gain when government and GLA Guidance becomes available on these.	Local Plan revised to include a policy on biodiversity net gain and reference the biodiversity metric.
Quaggy Waterway Action Group	2	GR 02 Page 350 Main Issues	"Access to open space - More and/or better provision will be needed in some areas to ensure everyone benefits from easy access to good quality parks and open spaces." **QWAG Comments:** QWAG supports the Plan's recognition that too many areas and people in the borough lack quality green open space near where they live. The Local Plan shows (appendices 4.3. and 4.4) that many areas of the borough lack local green space but it remains unclear how the Plan, which is predicated on accommodating more physical built development, will ensure that everyone has quality green and blue local space nearby. The Local Plan is written in a way where addressing the need for quality green and blue space is seen as an aspiration – a nice to have, not a need to have. That needs to change.	Noted. The draft Local Plan policy GR02 sets out expectations for major development proposals to deliver new publicly accessible open space unless it is demonstrated this is not feasible. The Part 3 site allocations sets out site-specific requirements for the delivery of new green/open space on a number or larger development sites.	Policy GR02 amended to make clear that major development proposals in areas of open space deficiency must incorporate publicly accessible open space unless it is demonstrated this is not feasible, in which case off-

					site planning contributions will be sought.
Quaggy Waterway Action Group	2	GR 02 Page 350 Main Issues	"Meeting the needs of a growing population - Creating new large open spaces will be challenging as land is needed for homes and jobs." **QWAG Comments:** Everyone needs quality green space nearby. The health and other benefits of having quality green and blue space nearby is widely evidenced – even before the added interest caused by the Covid-19 pandemic. As the Plan sets out many parts of the borough are deficient in local green space meaning that a large proportion of the borough's existing residents are not gaining any of the health and other benefits which others do every day and may even take for granted. The Local Plan must be clear about how it will ensure that in accommodating new development for housing and employment, such that the existing green and blue space deficiencies will not also apply to an expanded population for which the Plan is catering. Green space provision does not always have to be through the availability of large parks and green spaces. Natural England's standards for access to green space are an important starting point for the Council and developers to ensure that proper green space provision is made as part of any new development from the start and not as an afterthought once the development site has been packed and stacked.	Noted. The draft Local Plan policy GR02 sets out expectations for major development proposals to deliver new publicly accessible open space unless it is demonstrated this is not feasible. The Part 3 site allocations sets out site-specific requirements for the delivery of new green/open space on a number or larger development sites.	Policy GR02 amended to make clear that major development proposals in areas of open space deficiency must incorporate publicly accessible open space unless it is demonstrated this is not feasible, in which case off-site planning contributions will be sought.
Quaggy Waterway Action Group	2	GR 02	QWAG supports the Plan's recognition that too many areas and people in the borough lack quality green open space near where they live.	Support noted.	No change.
Quaggy Waterway Action Group	2	GR 02	The Local Plan shows (appendices 4.3. and 4.4) that many areas of the borough lack local green space but it remains unclear how the Plan, which is predicated on accommodating more physical built development, will ensure that everyone has quality green and blue local space nearby	Noted. The draft Local Plan sets out a range of measures to help improve the population's access to green and open spaces. This includes requirements for direct delivery of provision on-site and/or through public realm enhancements to enable new or improved access to existing spaces.	No change.
Quaggy Waterway Action Group	2	GR 02	The Local Plan is written in a way where addressing the need for quality green and blue space is seen as an aspiration – a nice to have, not a need to have. That needs to change.	Disagree. The draft Local Plan sets out a range of measures to help improve the population's access to green and open spaces. This includes requirements for direct delivery of provision on-site and/or through public realm enhancements	No change.
Quaggy Waterway Action Group	2	GR 02 Paragraph 10.5, page 359	"Meeting the needs of a growing population - Creating new large open spaces will be challenging as land is needed for homes and jobs." Is it 'inevitable' that development pressures on existing green spaces will rise? That will happen if the Council allows that to happen and has the vague policies and weak practices to	Noted. The point reflects that as the both London's and the Borough's population grows, it is likely that more people will seek to use existing open and green spaces. The draft Local Plan therefore sets out policies to protect these spaces along with facilitating the provision of new and improved spaces, including in areas where there are identified deficiencies.	No change.

			ensure such an outcome. Surely, the very purpose of the Local Plan is to ensure that a range of aims and needs are met.		
Quaggy Waterway Action Group	2	GR 02 Paragraph 10.5, page 359	Notwithstanding central government's policy preferencing land for housing over other uses, and the pressure the Council is under to accommodate the housing figures it has been handed, it does not make sense for people living in new housing to be denied access to nature and quality green space nearby, and allowing this to happen causes other significant pressures and costs.	Agreed. Through the Local Plan, the Council is seeking to ensure that people have good access to high quality parks and open spaces.	No change.
Quaggy Waterway Action Group	2	GR 02 Paragraph 10.5, page 359	How would letting that policy run affect other important issues such physical and mental health, let alone other benefits green space provides such as urban cooling and shade, reducing flood risk, helping to improve conditions for nature and string carbon?	Noted. The Local Plan recognises the multiple benefits of green and open space as suggested. Through the Local Plan, the Council is seeking to ensure that people have good access to high quality parks and open spaces.	No change.
Quaggy Waterway Action Group	2	GR 02 Paragraph 10.5, page 359	How has the Local Plan been tested to see how that assumption would play out	The Local Plan has been informed by Integrated Impact Assessment, which includes considerations for Strategic Environmental Assessment, Sustainability Appraisal, Health Impact Assessment, and Equalities Impact Assessment.	No change.
Quaggy Waterway Action Group	2	GR 02 Paragraph 10.5, page 359	This is as much about strong protection for existing spaces and improving their condition and amenity, and firm design standards for green space within all new development, including ensuring people know they can use spaces for outdoors recreation from food growing, gardening and formal and informal learning and development of skills, reading a book, etc.	Noted.	No change.
Quaggy Waterway Action Group	2	GR 02 Paragraph 10.5, page 359	It should be the role of the Local Plan and related design standards and supplementary guidance to ensure that the current inequitable provision of local green space is not carried forward in the next generation of physical development	Agreed. Therefore, the draft Local Plan seeks to ensure development proposals within areas that are deficient in open space maximise opportunities to introduce new publicly accessible open space and improve connections to existing or planned new open spaces.	No change.
Quaggy Waterway Action Group	2	GR 02 Paragraph 10.5, page 359	It is not clear how the Plan will ensure that the deficiencies in 2020-21 will not be rolled forward over the Plan's lifetime.	Noted. As with many other densely populated London Boroughs, the eradication of open space deficiency is unlikely due to the finite availability of land and the need to provide new housing and workspace. However, the local plan seeks to ensure development proposals within areas that are deficient in open space maximise opportunities to introduce new publicly accessible open space and improve connections to existing or planned new open spaces.	No change.
Quaggy Waterway Action Group	2	GR 02 Paragraph 10.5, page 359	It is also unclear from the Plan how the quality and function of spaces will be improved, how that will be assessed and implemented. Given the Plan's negative stance toward the potential to create new green space, it is also unclear how the Council and the Plan will ensure that spaces are better connected through green / blue corridor enhancements. If there is no space for green space, what space exists to link up and better connect what exists?	Noted. The draft Local Plan sets a policy criteria where ancillary uses will be supported to improve the quality and function of open spaces. Furthermore, the Council's Parks and Open Space Strategy sets out priorities for improving open spaces. The Local Plan seeks better connect open spaces through its Lewisham links policy set out in section 3 for each sub area. The spatial strategy maps indicate where stronger links can be made.	No change.

Quaggy Waterway Action Group	2	GR 02 Paragraph 10.5, page 359	Overall, the Plan says a lot of the right things without any sense that anything will happen other than a mass of development of dubious benefit. The nest iteration of the Local Plan will need to address this substantial flaws, ambiguities and uncertainties.	Disagree. The draft Local Plan sets out a development and investment framework for the Council and its partners, which includes priorities for conserving and enhancing the natural environment as well as improving provision of and access to open/green spaces.	No change.
Quaggy Waterway Action Group	2	GR 02	A "Open spaces are integral components of Lewisham's network of green infrastructure and **will be protected from inappropriate development**." **QWAG Comments:** QWAG agrees but the evidence has not been provided that the Local Plan will protect, conserve and improve what currently exists as well as addressing deficiencies and the necessary rise in ecological function.	Noted. The Local Plan has been informed by evidence base documents, including on open space and biodiversity. These documents sets out a baseline situation and assist with the identification of future needs. Officers consider that this evidence base is proportionate and sufficiently robust.	No change.
Quaggy Waterway Action Group	2	GR 02	B "Development proposals, particularly those located within areas that are deficient in open space, should **maximise opportunities to introduce new publicly accessible open space and improve connections to existing or planned new open spaces**. All major developments will be expected to incorporate publicly accessible open space unless it can be clearly demonstrated that this is not feasible." QWAG would supports this aspiration but the Plan leaves open the possibly of development occurring without proper provision of green open space. QWAG understand the viability clause and how this is now being applied to avoid development contributing to basic societal needs. The Plan should be very clear about the circumstances where green space provision would not be expected to be part and parcel of a scheme	Support noted. It is acknowledged that the policy could be strengthened to focus on the feasibility of delivering new or improved green infrastructure. Viability is a separate consideration – national planning policy makes clear that the Local Plan must be demonstrably viable (e.g. and should therefore not include policies which specify 'subject to viability'). The Council has prepared a Viability Assessment to support the Local Plan.	Policy GR02 amended to make clear that major development proposals in areas of open space deficiency must incorporate publicly accessible open space unless it is demonstrated this is not feasible, in which case off-site planning contributions will be sought
Quaggy Waterway Action Group	2	GR 02	C "Development proposals involving **the loss of open space will be strongly resisted**. In exceptional circumstances the loss of open space **will be permitted where replacement provision of at least an equivalent amount and better quality is provided within the local area catchment**. All replacement open space must be publicly accessible." QWAG supports this aspiration but the Plan should be clear about the exceptional circumstances and those would indeed, be exceptional, not the norm.	Noted.	Local Plan amended to provide clarity on the exceptional circumstances test.
Quaggy Waterway Action Group	2	GR 02	D "Development proposals involving the **reconfiguration of existing open space will be supported where**: a. There is **no net loss of open space and net gains are achieved wherever possible**; b. There is **no detrimental impact on the environmental function** of the open space, including support for nature conservation;	Noted. The draft Local Plan contains a range of strategic objectives which represent the main delivery outcomes sought through the Implementation of Lewisham's Local Plan in the context of key challenges facing the Borough now and over the long-term.	No change.

			c. **Demonstrable improvements in open space provision will be achieved, particularly in addressing identified deficiencies in the quality and quantity of open space** in the locality and public accessibility to it;…" E "Development proposals for **ancillary uses on open space (such as outdoor leisure facilities, outdoor play and fitness equipment, refreshment facilities, event space and public toilets) that help to improve the quality of open space and promote access to a wide range of users will be supported where they**: a. Are demonstrably ancillary to the use of land as open space; b. Are necessary to facilitate or **support the appropriate use** of the open space; c. **Do not have a detrimental impact on the environmental function** of the open space, including support for nature conservation; d. **Respond positively to local character**, including by maintaining or enhancing the visual quality of the open space and its setting; e. Are of a **scale and function that is proportionate** to the nature of the open space; and f. Are designed to a **high quality standard, are accessible and inclusive** to all, and do not detract from the amenity provided by the open space. F "Development proposals will be expected to **maintain and enhance Lewisham's network of open spaces, including by improving access to and connectivity between these spaces**. Priority should be given to measures that encourage walking, cycling and other active travel modes along routes that link open spaces such as the South East London Green Chain, Waterlink Way, the Thames Path and other local elements of the All London Green Grid. G "Development **proposals located adjacent to open space should respond positively to the character of the open space and seek to protect and enhance the habitat** value and visual amenity provided by it." H "Neighbourhood forums are encouraged to undertake detailed assessments to identify appropriate sites to **designate as Local Green Space in neighbourhood development plans**." How will the Plan assess the environmental function of spaces (see D b, E c)? The Plan has already been negative about the prospects to create more green space so it is not clear how the comments in this section (F) about improved linkages between spaces will be realised? What will be locally distinctive about the Plan in this section? For instance, will particular ecological features and habitats be prioritised to support local distinctive character and role in meeting other aims such as local civic pride, education and learning?	Proposals for development with a potential to impact on the nature conservation value of sites will be required to submit an up-to-date Ecological Assessment prepared by a suitably qualified ecologist. Furthermore, where appropriate development proposals, will be required to submit a Landscape Design Strategy and Arboriculture Survey to demonstrate that landscaping and other urban greening measures are appropriate to the site, can be implemented effectively and suitably managed over the lifetime of the development This is how the environmental function of open spaces will be assessed.	

			This section of the Plan without any sense of how the policies have been arrived at and what the borough would look and feel like as a result. For example, would there be more diverse species and habitats? Would some species that were vulnerable in 2020 being in heathier state by 2030? Will more people in the borough be able to name the boroughs three rivers and know whether they are in good or poor ecological condition? It is not at all clear what the Plan intended outcomes are as a result of the array of polices contained within the draft. The Plan should be able to articulate a clear sense of what is intended and what that means for everyday life. The current version is too abstract other than being very clear that the scale of development envisaged will handicap the achievement of other aims. High quality, well designed development can make a huge difference, but it is not clear that this is what will result from the Plan. If the Council is of a different view it will be straightforward for the next iteration of the Plan to be clear about this, and why and how.		
South East London Labour for a Green New Deal	2	GR 02	It is not enough to prioritise open spaces. We must ensure all parks and open spaces are organic, wildlife and climate friendly. For example, neither the council or their private contractors will use pesticides or any peat products. Open spaces should include plants that support insect and birdlife. This has to be led by Lewisham level and not left to park user groups. Many open spaces could support wildlife gardens or small reserves of type found on Peckham Rye, Greenwich Peninsular Ecology Park or the Centre for Wildlife gardening in Peckham; managed by local organisations they would also act as educational resources. Community gardens can also be developed on existing council estates.	Noted. The management of parks and opens spaces, including maintenance arrangements, are outside the scope of the Local Plan. The Council's adopted Parks and Open Spaces Strategy sets out priorities for managing and improving these spaces.	No change.
Telegraph Hill Society	2	GR 02	Policy **GR2** requires developers to provide "*open space*" however this can still result in the loss of green space as the two are not synonymous as explained above. GR2 requires redrafting such that the policy preserves or increases both open space AND green space and resists the loss of open space, including green space.	Noted. Draft Local Plan policy GR2.A sets out the basis for protecting open spaces from inappropriate development. This criterion will need to be considered in conjunction with other elements of the policy which set the basis for development proposals to make provision for new open space.	No change.
Telegraph Hill Society	2	GR 02	Policy **GR2.B** refers to "*development proposals, particularly those located within areas that are deficient in open space".* The scale of new developments, particularly in those areas where tall buildings are deemed suitable, require additional considerations to ensure that these areas do not become more deficient in green space. To put it bluntly, adding, for example, 2 acres of new green space for 1,000 new homes is likely to reduce the amenity as shared by all new and existing residents of the area even though it is on the face of it an increase in green space. The Council's policy should ensure that, in any local area, a new development does not result in a significant reduction of green space per person and should establish a base-line of minimum acceptable green space per person as a	Noted. The Lewisham Open Spaces Assessment (2019) considers the amount of open space that is needed to support the projected future population over the plan period, based on a fixed quantity standard. This suggests that a significant amount of additional provision will be required to maintain the standard over the long-term. Due to the finite availability of land and pressure to accommodate new development, such as for housing and workspace, it will be a significant challenge to maintain the standard as the population grows. In light of this, the draft Local Plan approach is to ensure that existing open spaces are protected, measures are	No change.

			target for 2040 in order to raise areas deficient in green space to an acceptable level and to ensure that every resident continues to have a sufficient level of local green accessible space. The figures for this policy can be based on those on the work done in the Lewisham Open Spaces Assessment (2019).	taken to improve their functional quality and access to them, and that opportunities are taken to deliver new provision wherever possible, and particularly in areas of identified deficiency.	
The Fourth Reserve	2	GR 02	We are a registered charity with the primary aim of protecting the New Cross to Forest Hill railway cutting but in particular the section known as the Buckthorne Cutting located in the Crofton Park Ward that sits between Courtrai Road SE23 and Crofton Gateway SE4. The area between Courtrai Road and Eddystone Road (Section A) is owned by property developers AA Homes and Housing and the area between Eddystone Road and Crofton Gateway (Section B) is owned by Network Rail and managed as a nature by our charity. It has been managed as a nature reserve since 2017. This section of the Forest Hill to New Cross railway is a remnant of the Great North Wood and is particularly important as it has significant ecological value and heritage value with ancient trees predating the urbanisation of Lewisham amongst other assets. A section of it is listed as an Asset of Community Value (Section A) and it is featured in the draft Neighbourhood Plan. The nature reserve (Section B) services several Lewisham schools and provides biodiversity data to Lewisham Council that is used to monitor Lewisham biodiversity outputs. It is therefore very disappointing to see that the Lewisham Local Plan has failed to recognise the existence of the Buckthorne Cutting in this consultation. It is not included as a Lewisham green space in the Local Plan appendix, is not a green space on the commonplace interactive map and is not included in any of the Local Plan text (although is indirectly included as it is part of the New Cross the Forest Hill Metropolitan SINC) Although we welcome the Local Plan's commitment to protect green space, to promote biodiversity and to celebrate the Great North Wood landscape of which we are part we feel that without assigning this undesignated heritage landscape with the policy designations it deserves, the land will remain under threat. The Local Plan is an opportunity to underline the importance of this site to the community but especially to Lewisham Borough Council who still fail to recognise it and the land owner who intends to build on it. To not include it in response to this consultation would be hugely irresponsible of Lewisham Council.	Noted.	Schedule 7 in Part 5 of the Local Plan revised to reflect Buckthorne Cutting Nature Reserved. In accordance with the Metropolitan Open Land Review Additional Sites Report, Buckthorne Cutting including the Old Scout's Hut has been designated as proposed Metropolitan Open Land.
The Fourth Reserve	2	GR 02	The Buckthorne Cutting should be included in the following ways: 1. Policy designation criteria:	Noted.	In accordance with the Metropolitan

			Local Green Space - the Buckthorne Cutting meets the criteria Is in close proximity to the community it serves • It is within a 5 minute walk of 2 local schools, a nursery, a church and within 2 minutes walk of Crofton Park high street, bars, cafes and shops. It is special to the local community and holds particular significance • Section A was one of the UK's earliest scouting grounds for almost 100 years achieving Asset of Community Value in 2018. The scouts want to return to their club and have done since they were evicted by the landowner in 2004. • It has a community park in the middle with a pocket garden and murals created by the community. • Section B has a community garden and a nature reserve that runs forest clubs servicing 5 local schools. • Sections A and B are rich in wildlife including endangered species and is home to rescued wildlife including rehabilitated birds of prey. • The cutting is part of a Metropolitan Site of Importance for Nature Conservation and is in the process of being designated by the London GeoPartnership as a Locally Important Geological Site (Borough wide importance) It is local in character and not an extensive tract of land • forms part of what was the historic Brockley Green • provides a canopy of trees over the high street and the iconic buildings of St.Hilda's, the Brockley Jack and the Rivoli Ballroom • Has very close connection with local community spanning centuries and to the current day hosting open days and community driven events including talks from the Great North Wood and history walks from the local historians. • Has a reed bed as remnant of the Croydon Canal • It covers the length of one short road so is not extensive		Open Land Review Additional Sites Report, Buckthorne Cutting including the Old Scout's Hut has been designated as proposed Metropolitan Open Land.
The Fourth Reserve	2	GR 02	**Metropolitan Open Land - Forest Hill to New Cross Railway Cutting meets the criteria** it contributes to the physical structure of London by being clearly distinguishable from the built-up area • The railway cutting forms a metropolitan SINC (M112) and is clearly distinguishable from the built-up area It is a significantly important ecological corridor forming a key part of the physical structure of London. • Forms an impressive natural landscape in an urban context, rare in London. • Excellent example of a green infrastructure-dominated public transport transit route to rival any other in Europe. These routes offer a best practice guide on how its design is not just a	Noted.	In accordance with the Metropolitan Open Land Review Additional Sites Report, Forest Hill to New Cross Railway Cutting has been designated as proposed Metropolitan Open Land. In accordance with the Revised Site

			transit infrastructure route, but an integrated green-infrastructure route to provide wider benefits of sustainable transport. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London • the cutting has four accessible Nature Reserves along its stretch. • In 2017 the north end of the cutting (New Cross Nature Reserve) was added onto the list of Sites of Geological Interest http:// londongeopartnership.org.uk/wp/wp-content/uploads/2018/08/Guidecitations-for-SGIs-2017.pdf. Recent geological findings in the middle part of the cutting, at Buckthorne Cutting Nature Reserve will designate this part an LIG also. • The corridor offers a number of open-air facilities, including the allotment and the 4 nature reserve sites which open regularly to the general public. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value • Unique historical context and landscape features. • As well as serving as a local natural heritage asset it also has metropolitan value, and arguably national value as well. The middle sections has links to the early scout movement, to the international peace movement of the 1800s and women's UK peace movement. • It is a rare example of a well-designed public transport corridor that supports different activities, and has the additional interest of its significant engineering history with the Croydon Canal. • It has both a natural heritage value and an intangible cultural heritage value. it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria. • It forms a very important part of the wider green infrastructure of Lewisham and London as a whole. • It forms an intrinsic part of the All London Green Grid. • The corridor is located within Area 6 - South East London Green Chain Plus. • It is adjacent to Section 11 – Crystal Palace Park to Nunhead Cemetery of the existing SE London Green Chain. This part of the GCW was opened in 2006 and goes through Camberwell New		Assessments for London's Foundations, Buckthorne Cutting has been designated as a Locally Important Geological Site.

			Cemetery on the other side of the railway tracks. However, there is immense potential to extend the walk to incorporate the M112 green corridor. • It is also on the route of the Locally defined Brockley Three Peaks Green Walk. We ask that the Local Plan process is used to finally mark the importance of this site in order to preserve and protect it and to help inform the council and planners with any future considerations relating to this area.		
The St John's Society	2	GR 02	Linking of green spaces – how is this proposed to occur when much/all/any free space might and probably will be given over to new housing? The Lewisham Links should be expanded as a priority.	Figure 3.9: Borough-wide spatial Strategy Plan demonstrates the linking of green spaces through Lewisham Links can be delivered alongside the provision of new housing.	No change.
Transport for London	2	GR 02	We seek clarification as to whether BLE construction works would be an acceptable form of (temporary) development in line with this policy GR2.	Noted. Temporary uses will be considered through the Development Management process. The Local Plan broadly seeks to secure the delivery of the BLE.	No change.
	2	GR 03	I would like the Lewisham Local Plan to recognise the value of the nature reserve [Buckthorne Cutting Nature Reserve] and the private land to the local community and to biodiversity by listing it as a Local Green Space at the very least. The whole railway corridor has 4 nature reserve and an allotment visited regularly by the public and I believe that to recognise this and to show the council how important it is the whole corridor could be considered as Metropolitan Open Land. As a volunteer I have heard a lot about the history of the site from its time as Brockley Green and the history of the scout movement. This also needs to be recognised by Lewisham Council as part of the Local Plan. It is probably one of the oldest sections of the Great North Wood and I can't understand why you have not included it in your maps at all.	Noted.	In accordance with the Metropolitan Open land Review Additional Sites Report, Buckthorne Cutting as well as the Forest Hill to New Cross Railway Cutting has been designated as proposed Metropolitan Open Land, which has the same level of protection as Green Belt.
	2	GR 03	I'm emailing about the wild green area at the back of Adamsrill Road that has been earmarked by a luxury development company for limited, high price housing. I live on Adamsrill Road and I love that green area - it was a big part of the reason why I chose to move here 5 years ago, so I could be closer to nature. I'd like to ask that the area be protected and put to use as a green space/forest/nature reserve for the community. It would be wonderful to see	Noted. The disused allotment to rear 53 of Adamsrill Road will be protected under a non-designated open space policy in the regulation 19 Plan.	Local Plan amended to clarify the different typologies of open space within an open space hierarchy and the level of

			children, older people, people with physical impairments and others having a space where they could be close to nature. This article on 'mini' urban forests shows what we could do with the space and the benefits it would bring to local wildlife, as well as supporting cleaner air to benefit the health and wellbeing of all residents.		protection afforded to each. This include clarification between green open spaces and other open spaces (e.g. hardstanding but part of public realm).
	2	GR 03	The Buckthorne road cutting needs to be protected. It's very disappointing that the council has allowed fly tipping at the scout hut. This land needs to be protected.	Noted.	In accordance with the Metropolitan Open land Review Additional Sites Report, Buckthorne Cutting, including the Old Scouts Hut, has been designated as proposed Metropolitan Open Land, which has same level of protection as Green Belt.
	2	GR 03	In addition I wanted to raise the future of Buckthorne Cutting. This is an amazing green space that desperately needs to be protected and made more accessible. Community efforts demonstrate what this could be; this is not a big lift. There's a huge opportunity here for Lewisham Council to give it open land designation and recognition for heritage landscape. As part of this, let's bring back Dandy Firth park. It's such a shame the land is wasted at the moment The Buckthorne road cutting needs to be protected. It's very disappointing that the council has allowed fly tipping at the scout hut. This land needs to be protected.	Noted.	In accordance with the Metropolitan Open land Review Additional Sites Report, Buckthorne Cutting, including the Old Scouts Hut, has been designated as proposed Metropolitan Open Land, which has the same level of

					protection as Green Belt.
	2	GR 03	Regarding the Lewisham local plan consultation, I would like to say that I do hope the plan will recognize the importance of the buckthorne nature reserve and the buckthorne cutting including the Old Scout Hut by Courtrai Road. This is a fantastic green space for the community and really important for local wildlife. The Old Scout Hut is also an important part of our Lewisham heritage and I do hope it will be protected with the potential for restoration to community use in the future.	Noted.	In accordance with the Metropolitan Open land Review Additional Sites Report, Buckthorne Cutting, including the Old Scouts Hut, has been designated as proposed Metropolitan Open Land, which has the same level of protection as Green Belt.
	2	GR 03	Land at the rear of Adamsrill and De Frene roads in Sydenham I wish to have noted my comments regarding the land to the rear of the above two roads. I have lived in my house which backs onto this land for 46 years. I do not wish to see it developed at all. It's a haven for wildlife. Developing it would mean our houses being overlooked and be far too close to our gardens. Even if it was turned into A community garden who would police it and stop vandals, drug users and vagrants getting in and it then becoming a security risk. Finally the proposed access is on a bend by two infants schools, surely LBL cannot be seriously thinking of going ahead with any plans here.	Noted. The disused allotment to rear 53 of Adamsrill Road will be protected under a non-designated open space policy in the regulation 19 Plan.	Local Plan amended to clarify the different typologies of open space within an open space hierarchy and the level of protection afforded to each. This include clarification between green open spaces and other open spaces (e.g. hardstanding but part of public realm)...
	2	GR 03	P368 10.11 Good. 10.12 The phrase 'Net Gains' (GR3A on P367) is not respecified and is very important. Wimpey (off Green Chain Walk in Baring Road) promised 'improvements to biodiversity'. The trees that are there are already in the Right Place through natural	Noted.	Local Plan revised to include a policy on biodiversity net gain with additional supporting text.

			ecological succession. No recreation of that or any destroyed habitat will ever be an improvement for biodiversity and be sustainable. It is not just trees, it is the soil microbiota that is fragile and is part of the ecological community. As Lewisham has declared a Climate Emergency then it should allow those trees to grow undisturbed and soak up that carbon. The officers and councillors have actually done a good (and risky) job defending these sites over the years (Willow Tree stables being the other one), thanks. 10.13 Education is finally mentioned and I referred to it earlier. Access to Nature includes volunteering and local stakeholder participation who benefit also by exercise socialising, mental health and team working (such as Friends of Brockley and Ladywell Cemeteries' workdays, Nature's Gym and 3 Rivers Clean Up projects). Desktop based members employ and develop mental agility in admin roles including campaigning and responding to these consultations!! These challenges can stave off dementia and maybe Alzheimer's. QWAG, Amenity Groups and Park User Groups (inc FoBLC) should be specified as partners to help Lewisham as resources are stretched and staff overworked. Local groups promote bat walks, bird feeders and boxes etc.,. keep an eye on Planning Applications and some even contribute directly to GiGL. They should not be seen as constraints or interfering. Lewisham Biodiversity Partnership is one of the most respected, able and functioning in England, mostly because of its efficient staff. Greenwich has no equivalent and its biodiversity suffers. 10:14 Good. Lewisham has one of the best records for Living Roofs around thanks to ([redacted]) et al. As a disciple of [redacted] I promoted them in my term on Planning Committee B as a Councillor for Ladywell 2006-10 and was seen as a joke. Now we are one of the lead boroughs! 10.15 Surveys should be carried out at the optimal time. A few years ago the developers for Willow Tree stables 'Ecologist' surveyed in middle of winter to find not a lot! Lewisham's Tesco car park is being cleared of vegetation right now to avoid the bird nesting season ready for the Meyer Homes development with the tallest residential block in South London which overlooks the original designated peak in Muse's NewLewisham project. 10.16 Lewisham cannot be seen in isolation. If my proposal for converging wildlife corridors feeding into to a Thames Green Bridge and disseminating corridors northwards were to be taken up by London then we would have a true, functioning and unique London National Park City		

			10.17 Site Management Plans are incredibly important and ongoing costs should be factored into the S106/CIL so that the management can be efficiently done by staff and/or volunteers. I have only ever seen myself litter pick in the river in Confluence Park, volunteering colleagues litter picked recently in Cornmill Garden's riparian banks, thankfully Glendale staff were happy to help disposing of the arisings. L&Q very very occasionally have a staff cohesion day doing the same although there is a levy on the rents to pay for the upkeep. LIDL in Lee High Road occasionally clear their customers' (and others') flytipping over the wall into the river bank. These situations must be monitored (e.g. in LIDL's case cameras in car parks) and regular management events set up, volunteers would be happy to help (as they do in the 3Rivers Clean Up events normally). P370 The map has interesting extensions and additions. Grow Mayow does lots for bees! Good to see Lewisham Park included although needs more wildlife friendly management. P371 There is an interesting deficient area straddling New Cross Gate to Brockley MOL although there is Vesta Road/Brockley/New Cross Gate Cutting Nature Reserve there, albeit only open rarely. Adjacent houses overlook the peaceful scene though. P372 The image is of Cornmill Gdns yet again with no river! Have you not got better own copyrighted library images? CG is a favourite, granted, as award winning and top priority for litter picking and maintenance as it is so central and observable from passing trains so setting a good example to be in Lewisham. Decayed decking and being a drinkers' haunt with associated litter has let it down though as Glendale cannot cope. Get a picture from the bridge of the steps (but clear the litter first).		
	2	GR 03	This email is intended to highlight my family support in keeping green spaces such as the Buckthorne Cutting Nature Reserve. We love living in Lewisham and wouldn't want to leave London but if special places likes this which are the last sanctuaries for wildlife in our neighbourhoods is taken away then that would be heart-breaking and detract from living in the area. Additionally, the Scouts house on Coutrai road has been locked up for years. What a waste! Could be used for such great green space for our children.	Noted.	In accordance with the Metropolitan Open land Review Additional Sites Report, Buckthorne Cutting, including the Old Scouts Hut, has been designated as proposed Metropolitan Open Land, which has the

					same level of protection as Green Belt.
	2	GR 03	As a local resident of Honor Oak I would like to register a request that Buckthorne Cutting is protected as Local Green Space & Area of Special Local Character. The cutting is a valuable natural space that should be preserved as part of the chain of nature reserves including New Cross Gate Cutting, Garthone Road and Devonshire Road.	Noted.	In accordance with the Metropolitan Open land Review Additional Sites Report, Buckthorne Cutting, including the Old Scouts Hut, has been designated as proposed Metropolitan Open Land, which has the same level of protection as Green Belt. Following a review of the designations it is proposed to include Buckthorne Cutting as an ASLC.
Blackheath Society no 2	2	GR 03	**GR3 Biodiversity and access to nature**. We support the policy. Reference is made to the local Biodiversity Action Plan. However, a search on the LBL website using 'Biodiversity Action Plan' as the search criteria brings up one document which relates to a tpo order in Grove Park. We believe that making information readily accessible to the public is essential to a successful delivery of the Plan. Also, the Biodiversity Action Plan covered a period ending in 2020 and it is therefore out of date. We are disappointed that a forward-looking plan such as the new Lewisham Local Plan should be based, in part, on outdated information.	Noted. A new Biodiversity Action Plan has been prepared.	Local Plan amended to refer to Lewisham Biodiversity Partnership's (LBP) new action plan 'A Natural Renaissance 2021-2026'.
Deptford Society	2	GR 03	**Page 366** Biodiversity- the council is now required to ensure the Local Plan delivers net gains in biodiversity. How will this be monitored? Will Lewisham publish an up-to-date Biodiversity Action Plan?	Noted. A new Biodiversity Action Plan has been prepared. Part 4 of the draft Local Plan sets out a delivery and monitoring framework. This will be updated to capture a monitor for Biodiversity Net Gain. Further information for monitoring will be set out in the Authority Monitoring Report.	Local Plan amended to refer to Lewisham Biodiversity Partnership's (LBP) new action

					plan 'A Natural Renaissance 2021-2026'. Local Plan Part 4 monitoring framework updated to include a new Local Performance Indicator for Biodiversity Net Gain.
Environment Agency	2	GR 03	We welcome draft policy "GR3 Biodiversity and access to nature" but feel it could be strengthened further by setting some targets to ensure its clear what is expected and how new development will deliver Biodiversity Net Gain (BNG). The current policy is unclear on how much net gain should be aimed for as a minimum. Whilst guidance doesn't currently provide a minimum, future legal requirements may be a 10% minimum. However, there is proposed to be provision for local authorities to require higher net gain levels than this. We would encourage local authorities to look at achieving meaningful increases in biodiversity and therefore aim for significant increases both on and off site. This is especially important in urban areas with high housing targets like in the London Borough of Lewisham and the need for ongoing net gain for people and wildlife. The current Local Plan does not detail how off site BNG could be achieved, where it is challenging to provide on-site. You should consider how this could be achieved, including by allocating particular green spaces for providing BNG or working alongside other local authorities or statutory bodies to provide a workable offsite BNG framework. This would be particularly useful for all work that impacts on watercourses and/or estuaries where delivery of net gain may be challenging due to legal, ownership, flood risk or other parameters	Noted. Part 2 Policy GR3 is aligned with the Government's Environment Act 2021	Local Plan amended to provide new policies on Biodiversity Net gain, in line with the Environment Act 2021
Grove Park Neighbourhood Forum	2	GR 03	The NPPF states that local authorities should map out ecological corridors. Which map does this?	Noted.	Figure 10.7 revised to include strategic habitat corridors identified the Lewisham Re-Survey of SINC Study (2016) as the borough's

					ecological corridors.
Grove Park Neighbourhood Forum	2	GR 03	The policy mentions 'sites with special biodiversity interests' Which are these sites? The SINC review doesn't have such a classification, it has local, borough and metropolitan sites of importance for nature conservation.	Noted.	Policy GR3 amended to provide more clarification on other sites with special biodiversity interest.
Grove Park Neighbourhood Forum	2	GR 03	Fig 10.7 designated nature conservation sites should include the Sydenham cottage extension area as per neighbourhood plan (not clear if it does due to scale)	Noted.	In accordance with the Open Space Review, the boundary Sydenham Cottage SINC has been revised to include two additional areas consisting of a native hedgerow along Alice Thompson Close to the west of the SINC and an area of woodland bordering the River Quaggy to the north.
HopCroft Neighbourhood Forum	2	GR 03	There is a reference to designation of Sites of Importance for Biodiversity but this designation is not clear/explained.	Noted	Policy GR3 amended to provide more clarification on other sites with special biodiversity interest.
HopCroft Neighbourhood Forum	2	GR 03	• The NPPF states that local authorities should map out ecological corridors. Which map does this? • The policy mentions 'sites with special biodiversity interests'. Which are these sites? • Fig 10.7 designated nature conservation sites should include the Sydenham cottage proposed new as per neighbourhood plan (not clear if it does due to scale)	Noted.	Figure 10.7 revised to include strategic habitat corridors identified in the Lewisham Re-Survey of SINC Study (2016) as the borough's ecological corridors

					Policy GR3 amended to provide more clarification on other sites with special biodiversity interest. In accordance with the Open Space Review, the boundary Sydenham Cottage SINC has been revised to include two additional areas consisting of a native hedgerow along Alice Thompson Close to the west of the SINC and an area of woodland bordering the River Quaggy to the north.
London Wildlife Trust	2	GR 03	We welcome and support this policy.	Support noted.	No change.
London Wildlife Trust	2	GR 03	There is a typo error in the 2nd line of A: "*Nature conservation sites will be safeguarded and protected in order to preserve or enhance priority habitats and species, as well*..	Noted. There is no full stop full stop at the end of 'as well'.	No change.
London Wildlife Trust	2	GR 03	In Part B it also references: "*retain existing habitats and features of biodiversity value*"; we recommend that either here or in the supporting para (10.11) this should explicitly state "priority habitats and priority and/or protected species".	Noted.	Policy GR3 revised to reflect protection, enhancement and identification of priority habitats and priority and/or protected species.
London Wildlife Trust	2	GR 03	In Part F it references: "…*likely to impact on sites with special biodiversity interests*..". We suggest the above also applies here too (or in supporting para 10.14).	Noted.	Policy GR3 revised to reflect

					protection, enhancement and identification of priority habitats and priority and/or protected species.
London Wildlife Trust	2	GR 03	The policy should also reference all the priority species (or Species of Principal Importance, for which public bodies have a duty to consider (including as a material consideration in planning under Section 41 of the NERC Act 2006) found in London, that accompanies the London Plan: https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/london-priority-species#	Noted.	Policy GR3 revised to reflect priority species, and making clear the London Environment Strategy is referred for further information on species.
London Wildlife Trust	2	GR 03	In para 10.15, we suggest specific reference to lighting, shading and future usage, as issues to be addressed in site assessments.	Noted.	Supporting text revised as suggested.
London Wildlife Trust	2	GR 03	We also recommend adding at the end "*Applicants are expected to make surveys available to Greenspace Information for Greater London (GiGL) to assist in the collection of information in Lewisham and the region, and aid in the future delivery of the Lewisham Biodiversity Action Plan*."	Noted.	Supporting text revised as suggested.
London Wildlife Trust	2	GR 03	In Figure 10.7: *Designated nature conservation sites*, it doesn't show the hierarchy of sites (Metropolitan, Borough, Local SINCs), nor bears relationship to the list in Schedule 8: *Designated Sites of Importance for Nature Conservation* (Table 21.3 – which in itself appears to have some errors or confusing naming in place). We recommend that the next iteration of the Local Plan includes a SINC map with each site listed and labelled (recognising that more detailed SINC maps with boundaries and citations are held on the Local Plan webpages).	Noted. As the plan is progressed through the next stages of the process, the Council may take the opportunity to include a map where each SINC site is listed and labelled, subject to resources available.	Figure 10.7 revised to reflect the hierarchy sites.
Quaggy Waterway Action Group	2	GR 03	"Biodiversity and nature - The council is now required to ensure the Local Plan delivers net gains in biodiversity." Under the Environment Bill (Act), local planning authorities will have to implement Biodiversity Net Gain, which is based on the theory that new housing will create / support more nature and biodiversity than might be lost when development occurs. That is the theory, but it is not at all clear that it will work and that, taken together, all of the development schemes subject to Biodiversity Net Gain will be ecologically coherent. That is just one reason why it is important that the Council and the Local Plan do not over rely on Biodiversity Net Gain, which	Noted. The Council will develop a Local Nature Recovery Strategy and a system for delivering mandatory Biodiversity Net Gain when government and GLA Guidance becomes available on these.	Local Plan amended to refer to future preparation of Local Nature Recovery Strategy and include a policy on biodiversity net gain referencing the

			should certainly not be regarded as a main way to deliver nature conservation and ecological restoration. There are environmental deficiencies including in ecosystems and their function which reliance on Biodiversity Net Gain will not address, and the Plan and the Council must be clear on where Biodiversity Net Gain will be used and where other more suitable measures will still be deployed and given proper priority. There are many risks with Biodiversity Net Gain not least: the lack of skills and capacity within the Council to make good, well evidenced decisions; the reliance on partial assessments from developers and their agents; the risk that measures which are put in failing to deliver for biodiversity for whatever reason (from inappropriate planning to poor aftercare). There is also considerable risk with Biodiversity Net Gain that any new green space or natural features which are created to compensate for losses are located far away. The Local Plan should be very clear about any losses being 'compensated' for within the locality.		biodiversity metric.
Quaggy Waterway Action Group	2	GR 03	"Access to open space - More and/or better provision will be needed in some areas to ensure everyone benefits from easy access to good quality parks and open spaces." How will the Plan assess the environmental function of spaces (see D b, E c)? The Plan has already been negative about the prospects to create more green space so it is not clear how the comments in this section (F) about improved linkages between spaces will be realised? What will be locally distinctive about the Plan in this section? For instance, will particular ecological features and habitats be prioritised to support local distinctive character and role in meeting other aims such as local civic pride, education and learning? This section of the Plan without any sense of how the policies have been arrived at and what the borough would look and feel like as a result. For example, would there be more diverse species and habitats? Would some species that were vulnerable in 2020 being in heathier state by 2030? Will more people in the borough be able to name the boroughs three rivers and know whether they are in good or poor ecological condition? It is not at all clear what the Plan intended outcomes are as a result of the array of polices contained within the draft. The Plan should be able to articulate a clear sense of what is intended and what that means for everyday life. The current version is too abstract other than being very clear that the scale of development envisaged will handicap the achievement of other aims. High quality, well designed development can make a huge difference, but it is not clear that this is what will result from the Plan. If the Council is of a different view it will be	Noted. The draft Local Plan sets out expectations for major development proposals to deliver new publicly accessible open space unless it is demonstrated this is not feasible. The Part 3 site allocations sets out site-specific requirements for the delivery of new green/open space on a number or larger development sites.	Policy amended to make clear that major development proposals in areas of open space deficiency must incorporate publicly accessible open space unless it is demonstrated this is not feasible, in which case off-site planning contributions will be sought.

			straightforward for the next iteration of the Plan to be clear about this, and why and how -		
South East London Labour for a Green New Deal	2	GR 03	Lewisham's Biodiversity Plan and Partnership are very positive; however the Biodiversity Plan expired in 2020. How is Lewisham renewing this? We believe there is huge interest in this area but not enough public knowledge about actions and renewing the plan is an opportunity to improve this. The mapped areas showing a lack of access to nature coincides with the north of the borough (one of the more deprived areas), which also targeted for significant major development. The current plans do not seem to adequately address this key issue.	Noted. A new Biodiversity Action Plan has been prepared and this will be referred in the plan. The draft Local Plan part 2 policies on Green Infrastructure set out the approach to deliver Biodiversity Net Gain as well as improve easy access to green spaces with wildlife value, particularly by walking and cycling.	Local Plan amended to refer to A Natural Renaissance for Lewisham (2021-2026).
South East London Labour for a Green New Deal	2	GR 03	As a further example, Lewisham needs to improve protections for species at risk such as bats and swifts. They need to identify where there are active colonies and work with local groups and residents to ensure that no nesting sites/roosts are destroyed or blocked. Similarly that all new developments (including small ones, house renovations) provide nesting boxes or bricks so that colonies can expand as well as local understanding of nesting habits.	Noted. The draft Local Plan seeks to protect habitats and species and further maximise opportunities wherever to enhance biodiversity. Further details are set out in Part 2 on Green infrastructure. Furthermore, the Local Plan states applicants should refer the local Biodiversity Action Plan, "A Natural Renaissance for Lewisham", which sets out information on the vision and opportunities for the Borough in this regard along with details on priority habitats and species.	No change.
Telegraph Hill Society	2	GR 03	As the draft Plan explains in the introduction to this section on page 355 and as we have referred to in paragraph 21 above, gardens are fundamentally important to biodiversity. The need for preserving garden space should be mentioned in this policy and cross-referred to policy **QD11**. Furthermore, the policies should make it clear that, in any new development, the overall impact on biodiversity should be considered: roof gardens, for example, cannot replace ground level gardens. Whilst they might provide a habitat for insects and birds they cannot provide a habitat for ground dwelling creatures such as hedgehogs or support the same variety of indigenous trees and shrubs.	Noted. The Local Plan should be read as whole for planning decisions and therefore there is no need duplicate policy QD11 in this section. It is considered that the Local Plan is clear that new development considers the impact on biodiversity by including policies which expect development proposals to: identify and retain existing habitats and features of biodiversity value; seek positive gains for biodiversity wherever possible and intergrate biodiversity fully into the design-led approach.	No change.
Telegraph Hill Society	2	GR 03	There is insufficient emphasis in the providing for additional green spaces in areas of nature deficiency as highlighted in **figure 10.8**. Given that this covers the majority of the north of the Borough, high rise development can only be appropriate if there are policies which provide for the creation of additional parks and nature reserves. We would expect a Plan which is a "Vision" for 2040 to set out the minimum need for those additional parks, to identify where they would be built and to apply similar site allocation policies as has been done for other development.	Noted. As the Borough's population increases, it is recognised a significant amount of additional provisionwill be required to maintain the standard of open space including green space over the long-term. However, due to the finite availability of land and pressure to accommodate new development, such as for housing and workspace, there will be imited opportunities to create new open space, including green space, of significant size. Therefore, the local plan seeks to ensure open and green space are protected , measures are taken to improve their functional quality, and that public access to them is enhanced.	No change.
The St John's Society	2	GR 03	Perennial planting to be encouraged with emphasis on improving biodiversity and areas to support wildlife. An evidence-led strategy is needed.	Noted. Perennial planting is encouraged as part of the Urban Green Factor which major proposals are subjected to.	No change.
	2	GR 04	2. Please plant more trees wherever possible and encourage community gardening efforts. I am involved with a scheme at Aspinall Road.	Noted. The draft Local Plan broadly supports urban greening, the creation of new open spaces and the green infrastructure network, including community gardens. There is a specific policy on food growing.	No change

	2	GR 04	Continued removal of Greenery, particularly mature trees, adversely affects the ecology of an area. This from a Council who have signed up to Climate Change reduction measures! Seems only applies to housing carbon emissions from the Council website!! Developments by the River Quaggy permitted with no provision for public access. E.g.Quaggy Apartments. Lack of forethought in ensuring access to the River Quaggy. Poor Planning Decisions re Greening. There is hope with the Site Allocation Notice for the old Penfold's site where there is currently a Car showroom.	Noted. The Local Plan sets policies for new development proposals. Development for which a planning consent has been granted is outside the scope of the Local Plan.	No change
	2	GR 04	P375 10.18 Good paragraph but I have seen comments from the street tree people that they are not being included enough. Just slip in 'Street trees' too into this paragraph as there is space. 10.19 That 'financial viability' get-out clause is in there again, it takes strong officers and councillors to see through the detail. Interesting that target UGF of 0.4 is detailed in intro para (P373) but not echoed or expanded here. Better to swap over. The loss of many trees in the arboretum within Hither Green Hospital redevelopment was shameful. 10.20 Brilliant paragraph influenced by (Name redacted) engagement over the years, especially in promoting the mix of PVs & LRs. The para would need to add that 1:50 scheme diagrams of LRs are required in Planning Apps. P376 10.21 Street Trees must be acknowledged as proven to reduce street pollution and ingress into properties' first floors. London Planes inadvertently soaked up the Victorian particulates and shed their filthy bark. Trees can also reduce ground level wind speeds caused by high buildings whilst reducing noise echoes from traffic, businesses, early morning waste collection or planes. Trees also by transpiration reduce the Heat Risk (P403) and Urban Heat Island effect. 10:22 I understand that some trees have little wildlife value and are constraints to development. I personally have managed teams in taking out the trees in Sundermead Estate, having to explain to locals that better trees were to come. Unfortunately the huge Veteran English Oak by UHL Phase 3 development was deemed a constraint although only service buildings were sited there and the space is now occupied by the well sculpture. It has never been replaced although there is a large empty boring green area adjacent nearer the Ladywell Unit.	Noted.	Glossary amended to reference street trees as part of Green infrastructure. Policy amended to refer street trees as package of greening measures. Supporting text revised to clarify the interim UGF factors for major residential and commercial development as advocated by the draft London Plan is 0.4.

			10.23 The huge standards (from Germany as no British suppliers at the time) ordered for Cornmill Garden and Ladywell Fields in the (EU Life funded) QUERCUS project were expensive but ultimately sustainable. 10.24 Local native provenance trees should be sought, although with Global Warming maybe examples selected and raised in the south might fare better. This is a complicated subject. Hopefully British nurseries are growing on larger native trees as demand rises. The Right Tree Right Place approach should also take into account wildflower meadow and aquatic habitats. Ladywell Fields and Cornmill Gardens have substantial populations of self seeded/lodged crack willow. 10.25 Reduced Council staff in this department are hard pressed to enforce breaches across the borough. Once again local amenity societies and groups can act as partners to help the council in delivering policy as they are closer to the ground and action, often monitoring situations before officers know (e.g. Baring Road Green Chain Walk development's bulldozers and fences up or poisoning of trees in Willow Tree Stable land where the Council was brave and quick to establish a blanket TPO). It will be interesting to see the post covid and Brexit effects evolving as regards land values and development pressure. P377 10.26 Please include 'proposals having regard to rivers' as they have been highlighted as part of Lew's Local Distinctiveness (The LBL crest is based on the rivers' Confluence). Lewisham is well known for its rehabilitation of rivers but there is plenty more to do (QWAG have been promoting 'Operation Kingfisher' since 1990. After some successes it is now adapted as Quaggy Links'). 10.27 Management Plan should include maintenance costs including officer time for outreach to and managing volunteers (which represents good value for money). such as funding cleanup projects in rivers (e.g. Cornmill Gdns if L&Q cannot get personpower together). The decking in Cornmill Gardens has rotted and is now fenced off as dangerous. Ongoing maintenance should have been factored in or better materials used originally. As well as boundary hedgerows (which can all dd up to those corridors) there should be space for wildflower meadow creations whether marginal or whole areas which may be on steep inaccessible slopes (93-121 Ermine Road flats have a glorious wildflower embankment that the groundsmen prefer not to over mow or strim as dangerous! Planting for pollinators should be encouraged and an elimination of pesticides		

			stipulated. If the estates are to be run by the likes of Lewisham Homes then an officer should be responsible for Biodiversity enhancement, perhaps funded by the developers. Lewisham Homes now sends a representative to the Lewisham Biodiversity Partnership as they are responsible for significant swathes of green space. Peabody had a dedicated ecological officer. 10.28 Too often large existing trees have parts of their roots covered by tarmac or concrete for road or pavements. Informal parking under trees should also be designed out. The two large oak trees by Burnt Ash Pond in Melrose Close have thrived since they were protected in the Council estate development		
	2	GR 04	Urban Greening Factor - should be applied to existing highways and public space.	Noted. The draft Local Plan proposes to apply the London Plan policies on Urban Greening Factor. Greening measures may include elements of public realm, however there are likely to be feasibility issues in terms of the highway network.	No change.
Blackheath Society no 2	2	GR 04	**GR4 Urban greening and trees**. We support the policy. There is a lack of specifics concerning tree cover. The plan says, 'London Plan sets out the Mayor's aspirations to increase tree cover in London by 10 per cent by 2050, which this policy provides support for'. It is not at all evident, in terms of quantification, how LBL's Plan will provide support for the London Plan. We note that the Plan identifies that: 'Many of the Borough's trees are located in private gardens….. Development proposals need to maximise opportunities to retain these trees for their ecosystem services and avoid compromising and encroaching available space for them…' However, no detail is given on how the council will give effect to the desire to protect trees in private gardens. We recognise that the council's powers are limited by legislation but we deplore the fact that an impression is given that the council will be able to protect rear garden trees when the reality is very different. We believe that a policy of openness and honesty about the limits of the council's ability to deliver on the Plan would engender greater resident confidence and trust. We similarly regret that the opportunity has not been taken to make a link, with detailed proposals, with the need to achieve carbon neutrality in coming years.	Noted. The Local Plan seeks to increase cover by including polices setting out that development proposals must suitably demonstrate that tree retention along with tree and other green infrastructure planting have been considered as part of the design-led approach.	Supporting text revised to acknowledge the protection of trees in private gardens is limited.
Blackheath Society no 2	2	GR 04	**GR4**. There is a need for good baselines to be established on tree canopy cover and TPO population so that targets on retention/increase can be set and monitored.	Noted. The National Planning Policy Framework and London Plan do not require Local Plans establish a baseline on the tree canopy cover or the number of trees with a TPO.	No change.
Deptford Society	2	GR 04	**Page 373** GR4D Living roofs, which are mandatory on flat roofs of new developments in Lewisham, need to be generous, well-maintained living roofs, not just token sedum that is never re-visited. A programme of maintenance is usually required at planning - but is this ever checked or enforced? The council should consider how best this can be maintained.	Noted. The draft Local Plan policy GR4 requires that development proposals demonstrate that green roofs and walls will function effectively over the lifetime of the development. This may include details of management and maintenance plans. Planning enforcement is outside the scope of the Local Plan.	No change.

Environment Agency	2	GR 04	**Policy GR4 – Urban greening** We welcome this policy and suggest any additional point is added to ensure new riverside development includes a buffer zone as part of urban greening policies. Suggested wording below ***"h: All riverside developments should aim to include an increased buffer zone between the development and the river (8 metres for main rivers and 16 metres for tidal rivers). The buffer zone should be kept free of all structures with no overhanging upper balconies or cantilevered structures.*** Delivering increased riverside buffer zones delivers multiple environmental improvements for people and wildlife and also delivers flood risk management and TE2100 plan actions to ensure more space is available for future flood defence upgrades and access for inspection and maintenance.	Noted.	Local Plan amended to set requirements for buffer zones from rivers, as recommended. This is captured in the water management policies in the Part 2 Sustainable Design and Infrastructure section.
Greater London Authority	2	GR 04	**Urban greening** The draft Local Plan requires major development to follow the Urban Greening Factor (UGF) approach as set out in Policy G5 of the London Plan and confirms that the London Plan targets will be applied. While it is noted that planning contributions may be sought where the target UGF is not achieved (Policy CR4(C)), it should be ensured that on-site greening is maximised as far as possible before such contributions are sought The GLA has published draft Planning Guidance to support the implementation of the Urban Greening Factor for information, which can be accessed via this link Urban Greening Factor (UGF) guidance pre-consultation draft | London City Hall. Consultation on the Guidance will take place during the summer 2021.	Noted.	Local Plan Part 2 Policy GR4 amended to highlight the need for major development to maximise the provision of on-site greening to achieve the target of Urban Greening Factor (UGF) before planning contributions are sought. Supporting text amended to reference Urban Greening Factor (UGF) guidance.
Grove Park Neighbourhood Forum	2	GR 04	Clause B states: "*by retaining or enhancing landscape features of historic, ecological and visual amenity value* ". Where are these areas identified? The Buckthorne Cutting has been pointed out as a landscape of historic ecological and amenity value and has not been acknowledged by LBL. Equally the Grove Park cutting has been highlighted as an area of significant cultural and natural heritage.	Noted. Applicants will be expected to identify landscape features of historic, ecological and visual amenity value through preparing a landscape design strategy.	Local Plan amended to designate Buckthorne Cutting as an Area of Special Local Character and Metropolitan Open Land.

Grove Park Neighbourhood Forum	2	GR 04	Tree retention should be emphasised as a paramount consideration, with wording made stronger. Development proposals **must** retain existing trees. Clause must incorporate tree council advise in terms of replacing loss of trees, where it is demonstrated that exceptional circumstances exist, at a ratio of min 1:3, ensuring that retention is promoted.	Noted. Draft Local Plan Policy GR4 is considered to set a sound basis for tree management and protection, which is consistent with the London Plan Policy G7 (Trees and Woodlands). Policy GR4.4 provides detailed requirements for replacement trees, and the supporting text sets out the Council's approach to use the CAVAT method for any off-site provision, which is considered a good practice approach.	No change.
Grove Park Neighbourhood Forum	2	GR 04	Supporting text should incorporate Tree Council guidance, as well as Trees in Right Place approach for replacement or new trees.	Noted. The supporting text refers to the Right Place Right Tree' approach as advocated by the Mayor's London Tree and Woodland Framework.	No change
Grove Park Neighbourhood Forum	2	GR 04	Using '*strongly resisted*' is a weak policy position. Should be strongly worded as **will be refused**.	Noted.	Local Plan revised to use more authoritative language where possible.
Hither Green West Campaign Group	2 3	GR 04 LCA	There are enormous opportunities to plant more street trees and soften and green the landscape around our roads and public spaces in Hither Green West. The Council should intensively 'green' the area, introducing new pocket parks. Street tree planting should be prioritised over on-street parking. The Plan should also encourage front garden planting, care and maintenance (especially at the high number of properties managed by the council themselves and Housing Associations) The station railings and embankment fencing on Springbank Road and Nightingale Grove are an eyesore and need improvement. Still, whilst dominant and imposing, the embankments themselves present a further opportunity to 'green' the area	The Local Plan seeks to ensure that development proposals maximise opportunities for additional tree planning on streets. The maintenance and management of front gardens as well as street parking is outside the scope of the Local Plan.	Local Plan amended to include Hither Green Lane at the west of Hither Green Station as Local Centre alongside place principles that seek to enhance character and accessibility
HopCroft Neighbourhood Forum	2	GR 04	Clause B states: "*by retaining or enhancing landscape features of historic, ecological and visual amenity value* ". Where are these areas identified? The Buckthorne Cutting has been pointed out as a landscape of historic ecological and amenity value and has not been acknowledged by LBL.	Applicants are expected to identify landscape features of historic, ecological and visual amenity value through preparing a landscape design strategy.	Plan revised to reflect Buckthorne Cutting as an area of special local character.
HopCroft Neighbourhood Forum	2	GR 04	Tree retention should be emphasised as a paramount consideration, with wording made stronger. Development proposals **must** retain existing trees. Clause must incorporate tree council advice in terms of replacing loss of trees, where it is demonstrated that exceptional circumstances exist and text should incorporate Tree Council guidance.	The policy approach sets out in Part2 Policy GR4 is consistent with the NPPF paragraph 131/179 and the London Plan Policy G7(Trees and woodlands)	No change
HopCroft Neighbourhood Forum	2	GR 04	Using '*strongly resisted*' should be replaced with '*will be refused'.*	Noted.	Policy GR4 will be reviewed to contain stronger wording "refused".

London Wildlife Trust	2	GR 04	We welcome and support this policy.	Support noted.	No change.
London Wildlife Trust	2	GR 04	In para 10.21; reference could be made to the Mayor's London Environment Strategy (2018) which has more details on the tree canopy cover targets, also set out in the London Urban Forest Plan (see below).	Noted.	Local Plan amended to refer to Mayor's London Environment Strategy (2018).
London Wildlife Trust	2	GR 04	In para 10.24 there is reference to the London Tree & Woodland Framework; this has been replaced by the London Urban Forest Plan (2020).7	Noted.	Local Plan amended to refer to London Urban Forest Plan (2020).
Quaggy Waterway Action Group	2	GR 04	A "Development proposals should incorporate **high quality landscaping and optimise opportunities for urban greening measures, including by incorporating high quality and species diverse landscaping, wildlife habitat, green roofs and walls, and sustainable drainage systems. Urban greening should be fully integrated into the design-led approach** with consideration given to the site setting within the wider landscape, as well as the layout, design, construction and long-term management of buildings and spaces." B "Development must respond positively to landforms including **by retaining or enhancing landscape features of historic, ecological and visual amenity value**." C "Major development proposals will **be expected to increase green cover on site to achieve the target Urban Greening Factor (UGF)** in the draft London Plan, unless it can be suitably demonstrated that this is not technically feasible. The target UGF score is 0.4 for predominantly residential development and 0.3 for predominantly commercial development. Existing green cover retained on-site will count towards the target score. Planning contributions may be sought where the target UGF is not achieved." D "Development proposals should **maximise the use of living roofs and walls**. Major development proposals will be expected to demonstrate that the feasibility of integrating these features has been fully investigated, and minor development proposals are strongly encouraged to incorporate them. Living roofs and walls will be supported where they are appropriately designed, installed and maintained. Proposals should have regard to the latest industry good practice guidance to help ensure that green roofs and walls are designed to maximise environmental benefits and will function effectively over the lifetime of the development. E "Development proposals should seek to **retain existing trees, as well as the associated habitat with regard for the urban forest, and maximise opportunities for additional tree planting and green infrastructure, particularly trees in characteristically urban settings such as streets**. All proposals must suitably demonstrate that tree retention along with tree	Support noted. Planning Service resources are outside the scope of the Local Plan. The draft Local Plan Part 2 policy on High Quality Design provides that development proposals must be informed by the design-led approach. This will help to ensure that environmental considerations, such as landscape and biodiversity, are considered at the early stage of the planning and design process. The Part 2 Policies on Green Infrastructure re-emphasise that biodiversity must be included in the design led approach, set out requirements for high quality landscaping.	No change.

			and other green infrastructure planting have been considered as part of the design-led approach and the development will: a. Provide for the sensitive integration of all trees whilst ensuring any new or replacement on-site provision is of a high ecological quality (including appropriate species, stem girth and life expectancy) and positively contributes to the microclimate; Page 374 b. **Protect veteran trees and ancient woodland**; c. **Retain trees of quality and associated habitat, wherever possible, with appropriate arrangements to secure their protection throughout demolition, construction, and external works, to the occupation stage of development**; d. **Avoid the loss of, and mitigate against adverse impacts on, trees of significant ecological, amenity and historical value**; e. Ensure building foundations are sufficient to be climate change resilient in proximity to trees; and f. **Ensure adequate replacement tree planting where the retention of trees is not reasonably practical, with replacement provision that meets the requirements of (a) above**. F Proposals involving the removal of protected trees (i.e. those covered by a Tree Protection Order and trees within Conservation Areas), or those that would have a detrimental impact on the health and visual amenity provided by protected trees, will be strongly resisted. The Council may identify and seek to protect trees that are of a significant amenity, heritage, ecological, or other value through the development management process. G "Major development proposals, and where appropriate other development proposals, will be required to submit a Landscape Design Strategy and Arboriculture Survey to demonstrate that landscaping and other urban greening measures are appropriate to the site, can be implemented effectively and suitably managed over the lifetime of the development." **QWAG comments:** QWAG supports much of this section. The same concerns about internal capacity, competence and culture apply. The Local Plan should ensure that no more development takes place with superficially green planting schemes. There should be proper ecological assessment of the potential of the land and sites to inform how trees, woodland, hedging, planting and other features are planned and maintained over time. That is the kind of step change required from all development instead of the reliance to date on low value amenity planting and trees stuck in concrete and rubbish strewn planters which the Council has permitted. How will the Council and the Plan ensure this becomes the norm?		

South East London Labour for a Green New Deal	2	GR 04	The draft plan sets out a strong commitment to trees preservation in the face of housing development. However, this appeared to mean little when the Tidemill Community Garden and its mature trees were destroyed for a new development in Deptford (a deficit area for nature). Will the plan ensure real protection on future developments or will there be numerous cases of "mitigation", in the pressure to build homes?	The Local Plan cannot influence development which has already been granted planning consent.	No change.
Telegraph Hill Society	2	GR 04	We do not consider that these proposals go far enough to provide for the Mayor of London's targets on 50% green cover nor to meet the Borough's aspirations on biodiversity (see our comments on **GR3**).	Noted. Draft Local Plan Policy GR4 is considered to set a sound basis for tree management and protection, which is consistent with the London Plan Policy G7 (Trees and Woodlands). Policy GR4.4 provides detailed requirements for replacement trees, and the supporting text sets out the Council's approach to use the CAVAT method for any off-site provision, which is considered a good practice approach.	No change.
Telegraph Hill Society	2	GR 04	As regards policy **GR4.D** we note that "*development proposals should maximise the use of living roofs and walls*". As living roofs and walls are not typically part of the current urban typology we are unclear how they fit with the requirement of policy **QD1** and especially **QD1.D.h**. In particular, as regards Conservation Areas, it is unlikely that living roofs and walls will fit harmoniously with the appearance of the area. More generally, they are likely detrimentally to affect and damage the aesthetics of Conservation Areas by their incongruence appearance. Guidance is needed within the Plan as to how these sections inter-react, with a clear preference being given to preserving the character and appearance of any Conservation Area impacted by such proposals.	Noted. The supporting text clarifies that living roofs and walls will be supported where they appropriately respond to local character and comply with other Local Plan policies. This includes consideration for the historic environment, where development must preserve the significance of heritage assets.	No change.
Telegraph Hill Society	2	GR 04	We note that open spaces have been created around many of the new developments and whilst in purely spatial terms they may provide some replacement for private gardens they remain generally unused except for dog exercise. Observation shows that they are little used by children or families for exercise and cannot have the same leisure or therapeutic benefits as gardens.	Noted. The local plan seeks to ensure through policies on high quality design that in the design on new public realm consideration is given to given to the ways in which people use the public realm and how its design will influence their experiences within it.	No change.
Telegraph Hill Society	2	GR 04	We note that there is no reference to street trees mentioned in this section although they clearly contribute heavily to the objectives of the green policies. We believe that a sub-policy should be added to **GR4** to protect street trees, to set targets for the increase in the number of street trees, and to control their removal. We appreciate that the majority of street trees are in the care of the Council and that this Plan primarily relates to development but see no reason why, if the Council is seeking to realise its "Vision", the Plan should not set out the intentions and aspirations of the Council as regards the elements within its own care. The explanations in **§ 10.21** through **§ 10.25** would seem to apply as much to the trees in the care of the Council as to any others.	Disagree. The policy seeks that development proposals retain existing trees which includes street trees as well maximise opportunities for additional tree planting on streets..	No change.
The St John's Society	2	GR 04	GREEN INFRASTRUCTURE	Noted. Tree Protection Orders are outside the scope of the Local Plan.	No change.

			Set ambitious targets for overall tree canopy cover and tree retention and planting. Wider rollout of TPOS - trees need to be protected, particularly older trees.		
	2	GR 05	P379 10:29 Allotments in the North of the Borough can be integrated into the North/South wildlife corridors proposed earlier. 10.30 Allotments and grounds should be encouraged to have safe ponds, wild areas, native hedges, bee friendly plots and policies to eliminate pesticides to increase Biodiversity. Remote allotments and community growing spaces need dry toilet provision as well as water supplies with buildings harvesting rainwater, preferably in underground cisterns. There is a typo on the image caption typo: Grow 'Maynow' should be Mayow. A summer picture would be brighter!!	Noted.	Local Plan amended to correct typo, as suggested. CHECK DESKTOP PUBLISH VERSION
Blackheath Society no 2	2	GR 05	**GR5 Food growing**. We support the policy.	Support noted.	No change.
London Wildlife Trust	2	GR 05	We support this policy.	Support noted.	No change.
Telegraph Hill Society	2	GR 05	Private gardens are also important for food growing and, anecdotally, have become more so during the COVID-19 pandemic. This use of private gardens should be mentioned in this policy and referred back to the need to protect such space set out in **QD11** as support for that policy.	Noted. The policy supporting text will be amended to indicate that private gardens are also used for food growing. However the policy focus is on allotments and community food gardens, whereas policies covering garden land development are dealt with elsewhere in the plan.	Supporting text amended to indicate that private gardens are also used for food growing but that GR05 does not apply to back gardens which are dealt with separately in the Local Plan.
Telegraph Hill Society	2	GR 05	Policy **GR5.B** encourages developers to provide communal garden space, and this may be the only possible way of providing garden space when tall towers or residential blocks are being developed. However, where smaller sites are being developed, developers should be encouraged to provide either private or, where this is not practical, communal garden space sufficient for the needs of all residents who require it.	Noted. The draft Local Plan proposes to adopt the London Plan housing standards including for outdoor amenity space. On smaller developments, therefore, the standards will help to provide space for gardening/food growing for occupants.	No change.
	2	GR 06	P381 10.32 Lewisham has not got any Geological SSSIs (like Greenwich) but we do have rivers, which technically create the often hidden geodiversity by eroding into hills and depositing in valleys. There could be images of a river eroding a bank in Ladywell Fields. Interestingly Beckenham Place Park used to be in Bromley including that tiny site cited! Who will be	Noted. Council officer resources are outside the scope of the Local Plan. Noted. The photos included in the draft Local Plan are provided for illustrative purposes only and do not carry material weight for planning decisions. As the plan is progressed through the next stages of the process, the	No change.

			responsible for organising the interpretation there? LBL's Nature Conservation Section or the Field Studies Council based in the Homesteads? Unfortunately there is no (3/4/5 borough funded) Green Chain Walk officer now who co-ordinated the impressive relief interpretation signs along the route. CILs from the five boroughs could be combined to fund a post. Technically tarmac, concrete, SUDS, hard standing and even buildings etc. are part of Anthropogenic future Geology. P402 Image of Cornmill Gardens please relocate to use a similar one to Page 350. I realise rivers cool the local environment but many do not get this. Loampit Vale's Renaissance development has a colourful chip burner to photograph	Council may take the opportunity to update these, subject to resources available.	
Blackheath Society no 2	2	GR 06	**GR6 Biodiversity**. We support the policy. We note that reference is made to Sites of Importance for Nature Conservation (SINCs) and that developers need to undertake evaluation work in respect of sites proximate to the development. Our recent experience of how this works out in practice gives us very little confidence in the willingness of LBL to protect SINCs against the competing need to meet housing targets in the borough. We believe the plan could be improved by being more specific around what is meant by biodiversity. We are concerned that developers may seek to achieve this using flora which has no connection to that already found in the borough and that numbers will trump quality.	Support noted. The draft Local Plan requires that, where appropriate, development proposals be accompanied by an Ecological Assessment carried out by a suitably qualified assessor. This will help to ensure that a robust process is in place to identify and consider the relevant biodiversity interests and potential impacts on them.	No change.
Grove Park Neighbourhood Forum	2	GR 06	Should also protect local designated sites, e.g. Vesta Road, Buckthorne Cutting. Equally the policy should positively enable the identification and designation of other sites that may arise.	Noted.	Local Plan revised to include the need to protect and promote Locally Important Geological Sites (LIGS) of Buckthorne Cutting and Old Gravel Pit, Blackheath (Eliot Pits) identified in the Revised Site Assessments for London's Foundations (2021). Supporting text of Policy GR6 revised to reflect Sites of

					Geological Interest at New Cross Cutting Nature Reserve and Ladywell.
HopCroft Neighbourhood Forum	2	GR 06	The geology section only includes Beckenham Place Park and protection of RIG (Regional wide) sites. As this is a borough plan then it should state that any LIG (borough wide) sites will be protected.	Noted.	Local Plan is revised to include the need to protect and promote Locally Important Geological Sites (LIGS) of Buckthorne Cutting and Old Gravel Pit, Blackheath (Eliot Pits) identified in the Revised Site Assessments for London's Foundations (2021). Supporting text of Policy GR6 revised to reflect Sites of Geological Interest at New Cross Cutting Nature Reserve and Ladywell.
HopCroft Neighbourhood Forum	2	GR 06	**GR6 Geodiversity** • Should also protect local designated sites, e.g. Vesta Road Nature Reserve and Buckthorne Cutting nature Reserve.	Noted.	Local Plan is revised to include the need to protect and promote Locally Important Geological Sites (LIGS) of Buckthorne Cutting and Old Gravel Pit, Blackheath (Eliot Pits) identified in the Revised Site Assessments for London's

					Foundations (2021). Supporting text of Policy GR6 revised to reflect Sites of Geological Interest at New Cross Cutting Nature Reserve and Ladywell.
London Wildlife Trust	2	GR 06	We welcome and support this policy. We recommend also reference in the supporting text to candidate Locally Important Geodiversity Sites (LIGS), e.g. at New Cross Gate Cutting (referenced in the London Geodiversity Action Plan 2019-24: http://londongeopartnership.org.uk/wp/wp-content/uploads/2019/04/LondonGAP-2019-2024.pdf)	Noted. New Cross Gate Cutting has been identified as a Site Geological Interest by the London Geodiversity Partnership. While they are important points of interest, the London Geodiversity Partnership have confirmed they are not significant enough to become LIGS or RIGS.	Supporting text of Policy GR6 revised to reflect Sites of Geological Interest at New Cross Cutting Nature Reserve and Ladywell.
	2	HE	4. Lee Green should become a designated conservation area, with protection for the Grade II listed fire station (and its detached period house next door) and the two Tiger's Head public houses.	Noted. The Council has procedures in place for the designation of Conservation Areas and listing of heritage assets which are separate from the Local Plan process.	No change.
	2	HE	3) Heritage Assets Lewisham has some wonderful but dilapidated heritage assets eg Ladywell Baths area, also old churches. Can we include an aspiration that these be brought up to their potential before 2040?	Noted. The draft Local Plan Part 2 – Heritage policies seek to ensure that Lewisham's heritage assets are preserved and enhanced. This includes identifying opportunities for and supporting the restoration, repair and reinstatement of buildings, structures and spaces of historic significance. It is not considered appropriate to include a long-list in the plan. The Council has prepared Conservation Area Appraisals which support the Local Plan. Work on CA Appraisals will continue over the plan period is part of the ongoing proactive conservation work that is mentioned above.	No change.
Blackheath Society no 2	2	HE	Welcome requirement of a Heritage Statement for all developments, not just in Conservation Areas.	Support noted.	No change.
Brockley Society	2	HE	2.The importance of protecting heritage assets should be reflected more fully in the proposals We welcome the fact that the draft recognises the benefits of designated and undesignated heritage assets and the importance of protecting them through planning policy. However, this principle should be carried through more clearly into the individual development policies. We have suggested drafting changes to that effect further below. In particular, we believe it is important to recognise expressly the value of the Council's existing Character Appraisals and SPDs for conservation areas. These documents protect the heritage value of conservation areas by setting development	Noted. The Local Plan must be read as a whole. The Part 2 policies on heritage will need to be considered alongside site allocation policies which also refer to heritage. Applications for development proposals affecting or likely to affect a heritage asset must provide a Heritage Statement. The Council would expect that relevant Conservation Area Appraisals are considered as part of the design-led approach.	Local Plan policy HE1 amended to make clear that heritage statements must be informed by Conservation Area Appraisals, and other information where relevant.

			standards that are tailored to the character of the specific area. They also go into a level of detail that is not found in other publicly available planning documents, which helps homeowners and other small-scale developers understand clearly features that are architecturally important for the area – and therefore what kinds of development will or will not be permitted.		
Brockley Society	2	HE	**Conservation Areas**: References in the Local Plan to Conservation Areas are inadequate yet SAs may be unintentionally endangered by changes in government policy and need to be better championed and protected in the plan through other measures. This emphasises the need for transparency at all levels when considering legislation and policies affecting Conservation Areas.	Noted. The Local Plan must be read as a whole. The Part 2 policies on heritage will need to be considered alongside site allocation policies. The Local Plan can only set planning policies and guidance to support the preservation and enhancement of the historic environment, including Conservation Areas – other measures are outside the scope of the plan. The Local Plan must be in general conformity with national planning policy; where national policies are updated this may require a review of the local plan policies.	No change.
Deptford Society	2	HE	**Page 155** We consider it crucial that there is explicit acknowledgement of the fact that the entire Deptford High St & St Paul's conservation area is on the 'at risk' register (and has been for some time). This conservation area includes St Paul's Church, one of only two Grade I listed assets in the borough, and as such its improvement and protection should be a high priority for the council. Deptford's history is not only of national significance but also international significance. Combined with its pre-eminence over decades as a cauldron of creative activity and a beacon of diversity and inclusion, it could and should be the jewel in Lewisham's crown.	For clarification, it was the Deptford High Street CA which was on the HAR Register, not St Paul's CA. These two CAs have now been merged, so in theory the area containing St Paul's Church is included in the CA on the Register, but in practice this part of the CA does not display the same issues as the rest of the CA, which let it to be put on, and stay on, the Register. The CA is a priority for the Council, and we have adopted a new appraisal, and are taking targeted enforcement action.	No change.
Grove Park Neighbourhood Forum	2	HE	LBL acknowledge that more should be done to improve historic environment stating: "Better preserving the special qualities of places outside of Conservation Areas". It should be made clearer that this includes Natural Heritage and sites which have been pointed out at the character study workshop and since via various correspondence with the Council such as Buckthorne Cutting / Forest Hill-New Cross Cutting and Hither Green Sidings, are all rich in history and natural heritage and should be highlighted as areas of special local character and as special local landscape character, and should be emphatically embedded into the Local Plan.	Noted. The draft Local Plan Part 2 sets out policies on Areas of Special Local Character. There are currently 12 ASLC identified within the borough. The Council will in the future adopt selection criteria for assessing potential new ASLC.	Local Plan amended to provide more information around the process for the identification of new Areas of Special Local Character.
Lee Forum	2	HE	The online session made much of how Lewisham has expanded the number of locally listed buildings but little is set out about how the council intends making sure they are protected and that enforcement is done at speed. Greater emphasis is needed on enforcement and targets set and monitored for actioned responses.	Noted. Draft Local Plan Policy HE 1 states that the Council will use powers to available to appropriately manage new development and remedy unauthorised works. However, planning enforcement is outside the scope of the Local Plan.	No change.
Lee Forum	2	HE	Commitment to enforcement must be strong and active and stated explicitly to demonstrate that developers can't get away with tampering with designated and non-designated heritage buildings.	Noted. Draft Local Plan Policy HE 1 states that the Council will use powers to available to appropriately manage new development and remedy unauthorised works. However, planning enforcement is outside the scope of the Local Plan.	No change.
Telegraph Hill Society	2	HE	We note that **page 154** includes concerns that have been notified to the Council about heritage issues. The concerns	Noted. The council considers these matters are adequately addressed through the Alterations and Extensions SPD.	No change.

			expressed over "*small works such as house extensions*" within Conservation Areas are not adequately addressed within the current SDG which needs revisiting. In particular we have considerable concern over the amount of demolition that is taking place of original fabric such as bay windows and the introduction of elements such as stylistically inappropriate large-pane bifold windows which the current SDG permits and, indeed, even illustrates as acceptable. The current SDG similarly seems powerless to prevent the introduction of increasing numbers of front rooflights into properties within our Conservation Area, despite our Area's Character Appraisal specifically mentioning such additions as "*eroding the special characteristics of the area*". We would urge the Council to include a commitment to revising and strengthening the protections given to all Conservation Areas over small works by a revision of the Alterations and Extensions SDG and further development of the various Conservation Area Character Appraisals where necessary.		
Telegraph Hill Society	2	HE	We appreciate that the illustrations do not form part of the Plan, but it seems unusual that there is no illustration here of the Victorian properties which form the bulk of the Borough's townscape (outside Lewisham Centre) and are a key element in the majority of the Borough's Conservation Areas. This heritage contributes so substantially to its character and the built environment except in the area around Lewisham station and the south eastern neighbourhood (primarily post-war with its own special characteristics). This needs addressing in the final Plan to avoid the impression that these are being forgotten or demoted in importance amongst all the modern high-rise buildings which are so copiously illustrated in the present draft.	Noted. The council will consider scope to update images and photos which are not material to the policies, where resources are available.	No change.
Telegraph Hill Society	2	HE	We contributed in 2019 to the Council's consultations over a general heritage strategy. We were informed at the time that this would contribute to the Borough's formulation of its Local Plan. It is regrettable, therefore, that the Council's work on this project ceased as a result of COVID-19 and we trust, as we are informed, that it will recommence during Summer 2021 and will inform the next version of the Plan before the document is finalised.	Noted. The preparation of the Local Plan is being informed by evidence on the historic environment, including the Lewisham Characterisation Study and Conservation Area Appraisals. The Heritage Strategy would help support the implementation of the Local Plan. The Council is will review the programme and scope of proactive conservation work taking into account resources available.	No change.
Blackheath Society no 2	2	HE 01	No clear detailed vision for Blackheath Village, CA and Heath	Noted. The draft Local Plan Part 3 west area objectives and place policies address Blackheath Village and its surrounds. The Council has prepared a Conservation Area Appraisal for the Blackheath CA, which will help to support the implementation of the Local Plan.	No change.
	2	HE 01	The redevelopment occurring in the area is significantly affecting the former 1930s character of the Woodstock Parade and surrounding streets. There is an increase in rented accommodation and an unrestricted conversion to HMOs. This has also resulted in unsightly estate agent boards, formerly not permitted on Woodstock Court for example. The 8 houses built at the expense of the Hedges and Green Communal area in the enclave, were originally to be for Sale	Draft Local Plan Policy HE 1 states that the Council will use powers to available to appropriately manage new development and remedy unauthorised works. However, S215 notices are outside the scope of the Local Plan.	No change.

			but now are all to be rented. This has resulted in a massive unsightly advertising sign negating the look of the Court, which, as they are now for rent could be there, ad infinitum. The permanent Triangular signs up on the building also mar the look and being over the entrance are a potential hazard. This happened along the shopping parade when one fell onto the pavement! Lack of application of S215 Notice 0f Town and Country Planning Act 1990 Where the condition of Land and Buildings adversely affects the amenity of an area.		
Blackheath Society no 2	2	HE 01	**HE1 Lewisham's historic environment**. What extra protection is to be afforded to heritage assets (stat & non-stat) and their settings, especially outside CAs? We would like more local listings and more Article 4 protection for areas, plus speedier and more effective use of S215 orders (only one mention, at p162) to protect, all to help protect the unique character of local neighbourhoods, which is quickly lost.	The Local Plan policies sets out approaches to conserving and enhancing heritage assets and their significance in line with higher level policies. The making of Article 4 Directions and the use of Section 215 Orders are potential tools, but outside the scope of the Local Plan. This will be considered subject to resources available.	No change.
Brockley Society	2	HE 01	Page 159, paragraphs B and C: these paragraphs contemplate a balancing exercise between avoiding harm to the heritage value of an asset and securing a public benefit. This balancing exercise should begin from the presumption that harm to heritage value is impermissible and be weighted in favour of preserving that heritage value. Any harm must be limited to that necessary and the future of the asset should be secured. It should also be made clear that this exercise does not apply to conservation areas, listed buildings or other designated assets which the Council has a legal duty to protect. We therefore suggest the following amendment. *"B. All proposals in the historic environment should assess whether the site, building or structure is – or could be – identified as a heritage asset. The Council will consider the significance of the asset and the impact of the proposals on its special interest. <u>The Council will resist proposals that harm the heritage value of the asset unless all the following conditions are met</u>:* - *<u>there is a clear and compelling public benefit that cannot be achieved without causing harm to the heritage value of the asset;</u>* - *<u>the harm is limited to what is necessary to achieve the public benefit; and</u>* - *<u>the proposals clearly demonstrate how the remaining heritage value of the asset will be protected over the short and long term.</u>*	The Local Plan policies sets out approaches to conserving and enhancing heritage assets and their significance in line with higher level policies.	No change.
Deptford Society	2	HE 01	**Page 157** We welcome the requirement for developers to submit a heritage statement, but such statements must be of sufficient quality and accuracy to be meaningful. The DS	Noted.	Local Plan amended with new supporting

			regularly has to object to the content of heritage statements that are submitted with planning applications for sites in our conservation areas. In some cases the content is alarmingly inaccurate and in others merely generic, dealing only with the wider area and not the specific building. The ages and architectural descriptions of buildings given are often incorrect and there are often many other factual errors. Simply requiring these fundamental points to be corrected offers no reassurance. We urge the council to place more emphasis on the importance of heritage statements, and to propose stronger measures when they fail to meet the required standard. Where there is an obvious lack of basic knowledge and/or care, these applications should be refused.		text to state that the quality, accuracy and comprehensiveness of heritage statements will be considered in the determination of planning applications.
Deptford Society	2	HE 01	**Page 159** point d: Requiring that heritage meaningfully informs the design of development proposals, and ONLY supporting development that preserves or enhances the significance of heritage assets and their setting;	Noted.	Local Plan amended as suggested.
Deptford Society	2	HE 01	**Page 159** point e: Promoting heritage-led regeneration and urban renewal ONLY where this ensures that new development retains, reveals or reinstates significant aspects of the Borough's historic environment;	Noted. The suggested change is considered to be inconsistent with national planning policy. However it the plan will be amended for clarification on this point.	Local Plan amended to state support for heritage-led regeneration and urban renewal as a means to retain, reveal or reinstate significant aspects of the historic environment.
Deptford Society	2	HE 01 Paragraph 6.12-6.13	**Page 162** items 6.12 and 6.13: these are simply statements of fact setting out the council's powers, but do not offer any guidance as to how they will be applied.	Noted. This intention of signposting these actions is to make the public aware of other powers the Council has at its disposal to support the implementation of the Local Plan and its strategic objectives. The powers themselves are outside the scope of the Local Plan and therefore no further information is provided, as this is dealt with separately.	No change.
Historic England	2	HE 01	We welcome the commitment to a Heritage Strategy within policy HE1 and the contextually appropriate approach to new development set out in policy QD1.	Support noted.	No change.
London Wildlife Trust	2	HE 01	We support this policy in principle. However, in terms of historic landscapes and other semi-natural features the policy should accommodate the needs of nature now and for the future. Many 'historic' landscapes were designed and created in different eras, when nature was more abundant, and less threatened than it is now.6 In addition, the needs for adaptation to a changing climate and reversing biodiversity declines, may require less 'preservative' interventions to 'roll-back and reveal' the past. We would recommend this to be referenced in the supportive text (paras 6.7-8?) along the lines of 'Proposals that affect heritage assets will need to	Noted. Landscape is addressed through the Green Infrastructure policies in Part 2. The plan must be read as a whole.	No change.

			demonstrate how their current ecological interest is not adversely impacted, and that they are future proofed to address likely biodiversity and climate change requirements.'		
Sydenham Society	2	HE 01	**HE1 Lewisham's historic environment (p161)** The Sydenham Society supports these policies but wishes to see greater use of Article 4 directions, particularly with regard to locally listed designated assets.	Support noted. Policy HE 1 states that the Council will use powers to available to appropriately manage new development and remedy unauthorised works. However, planning enforcement is outside the scope of the Local Plan.	No change.
Telegraph Hill Society	2	HE 01	**Policy HE1.A.a**: The implication of the drafting of **§ 6.4** *("Our expectation is that community and special interest groups, key stakeholders and the development industry …"*) is that community and special interest groups are not key stakeholders. It should be redrafted as "*Our expectation is that key stakeholders, including community and special interest groups, and the development industry… "*	Agreed.	Supporting text amended as suggested.
Telegraph Hill Society	2	HE 01	The reference material included in **§ 6.5** should include Conservation Area Character Appraisals. Our understanding is that these are material consideration, but we find that they are often omitted from consideration both in developers' applications and in the written reports on those applications prepared by Council Officers during the planning process.	Agreed.	Local Plan policy HO1 amended to make clear that Conservation Area Appraisals must be considered through the design-led approach.
Telegraph Hill Society	2	HE 01	We strongly support the statement in **§ 6.10**: "Where there is evidence of deliberate neglect or damage to a heritage asset, the current condition of the asset will not be taken into account in planning decisions." We welcome this statement but feel this should be wider, requires clarification and should be included in a Policy in order to give it more weight and not as mere Explanation (see our comment at paragraph 74).	Support noted. The policy point is also included in the National Planning Policy Framework, and therefore has additional weight at the higher level.	No change.
Telegraph Hill Society	2	HE 01	**Policy HE.1.B**: This policy sections refer to the "*historic environment*" which is referred to in **§ 6.1** and seems to have a wider context than the remainder of explanatory text which refers to "*heritage assets*". We consider that the policies on preserving the historic environment should be wider than just heritage assets, although we welcome the protection given to heritage assets. The heritage of the Borough and the appeal of the Borough as a place to live can be damaged by poor development of historic assets outside those defined as heritage assets as the following illustrations of Endwell Road illustrate	Noted. The Local Plan provides that development proposals must preserve and enhance the significance of heritage assets and their setting. In addition, the High Quality Design policies require development to respond positively to local character – this will address buildings or areas which are not heritage assets but which make a positive contribution to local distinctiveness.	No change.
Telegraph Hill Society	2	HE 01	The more general planning policies for development of sites outside heritage areas, where they affect the historic environment, need to be given due consideration in this section as a guide to what constitutes more general good design-led development.	Noted. The Local Plan provides that development proposals must preserve and enhance the significance of heritage assets and their setting. In addition, the High Quality Design policies require development to respond positively to local character – this will address buildings or areas which are not heritage assets but which make a positive contribution to local distinctiveness.	No change.

The Hatcham Society	2 2	HE 01 QD 11	Conservation We see the prospect of back garden and infill developments (QD11) as a particular risk to the character of the borough's conservation areas because they will be historically and architecturally incongruous. Policy QD11 should therefore be clear that development will not be permitted in conservation areas. We suggest the following addition to paragraph A: b. The development has a clear urban design rationale; and c. The development does not detract from local and historical character and is not otherwise detrimental to any heritage asset. Within Page 159, paragraphs B and C of the Plan, the paragraph contemplates a balancing exercise between avoiding harm to the heritage value of an asset and securing a public benefit. This balancing exercise should begin from the presumption that harm to heritage value is impermissible and be weighted in favour of preserving that heritage value. Any harm must be limited to that necessary and the future of the asset should be secured. It should also be made clear that this exercise does not apply to conservation areas, listed buildings or other designated assets which the Council has a legal duty to protect.	Noted. The draft policy QD11 and Small Sites SPD are considered to appropriately address impacts on the historic environment.	No change.
Blackheath Society no 2	2	HE 02	**HE2 Designated heritage assets, HE3 Non-designated heritage assets**. See HE1 above. Section needs reference to supporting retrofitting of listed buildings and conservation areas to support sustainability and climate control.	The draft Local Plan Policy SD2 provides that sustainable retrofitting will be supported where development does not harm the significance of heritage assets and their setting.	Local Plan amended with additional policy on sustainable retrofitting, with additional support text on retrofitting of heritage assets.
Brockley Society	2	HE 02	Page 165, policy HE2: As mentioned above, the Council's conservation area character appraisals and SPDs are play an important role in setting clear, high standards and should be emphasised here. We suggest the following amendment: *B. Within Conservation Areas proposals for new development (including alterations and extensions to existing buildings) will <u>only</u> be supported where they:* *a. Preserve or enhance the special character and appearance of the Conservation Area <u>(taking into account any Character Appraisal or other guidance issued by the Council)</u> having particular regard to: …* *c. <u>Demonstrate compliance with any applicable Supplementary Planning Document.</u>*	Noted. The Council cannot require development proposals to comply with planning guidance, as this does not form part of the statutory development plan.	Local Plan policy HO1 amended to make clear that Conservation Area Appraisals must be considered through the design-led approach.
Deptford Society	2	HE 02	**Page 165** point B: Within Conservation Areas proposals for new development (including alterations and extensions to existing buildings) will ONLY be supported where they:	Noted.	Local Plan amended as suggested.

Deptford Society	2	HE 02	**Page 165** point D: Proposals for the redevelopment of sites, buildings and structures that detract from the special characteristics of a Conservation Area will ONLY be supported where they will complement and positively impact on the character and significance of the area.	Noted.	Local Plan amended as suggested.
Greater London Authority	2	HE 02	**Heritage** Local Plan Policy HE2 highlights the Maritime Greenwich World Heritage Site (WHS) Buffer Zone. However, the Buffer Zone should not be seen in isolation and, in line with London Plan paragraph 7.2.4, it would be beneficial to include further detail on how to ensure that the Outstanding Universal Value (OUV) of the WHS would be protected.	Noted. Additional details will be included in the plan, recognising that the London Plan states that further supplementary planning guidance will be prepared for this policy area.	Local Plan amended so HE 2 is clearer on the need for the preservation of the setting of the World Heritage Site. Additional supporting text is also included to identify key threats to the OUV of the heritage site, and how this should be considered, along with signpost to future London Plan guidance.
Hither Green West Campaign Group	2 2 3	HE 02 HE 03 LCA	Heritage and housing Hither Green West (in particular the housing which forms part of the Corbett Estate), should be designated a conservation area, or, as a minimum, an 'Area of Special Local Character'. Alternatively, the Plan should protect and enhance our predominantly Victorian housing stock, most of which is not listed. The Plan should prevent unsympathetic refurbishment and encourage the reinstatement of original or other features that would preserve and enhance Hither Green West's character and identity.	Corbett Estate is not considered to meet the requirements to merit designation as a Conservation Area. However it could be identified as an Area of Special Local Character. The Local Plan broadly seeks to ensure that development proposals respond positively to local character. The Council has adopted an Alterations and Extensions SPD dealing with such householder developments and will support the Local Plan.	Local Plan amended to provide details on process for future identification of Areas of Special Local Character.
Lewisham Park Crescent Residents	2	HE 02	**HE2 Designated heritage assets** 23. Lewisham has a number of conservation areas which are generally verdant in character due to the use of street trees, the preponderance of mature trees and shrubs within private gardens and the generous size of those gardens. This verdant character is an important local amenity for residents and passers-by and it is also an intrinsic part of the suburban character of the Conservation Areas within Lewisham.	Noted. The draft Local Plan broadly requires development proposals to respond positively to local character, based on a detailed understanding of the site and its wider local context.	No change.
Lewisham Park Crescent Residents	2	HE 02	23. Lewisham have for a number of years been implementing policy DM33 from the Development Management Local Plan which resists development on garden land and amenity areas and in turn seeks to	Noted. The Local Plan broadly seeks to take forward the principles of Policy DM33 in the new Local Plan.	No change.

			protect local character. This has been implemented whilst at the same time the Borough has largely been exceeding its house building targets. Whilst the Association wishes to be able to support new development this should not be at the expense of local amenity.		
Lewisham Park Crescent Residents	2	HE 02	24. The potential for piecemeal demolition and redevelopment of existing buildings and their gardens could have the potential to significantly and harmfully impact on the character of the local area. This is particularly true for Conservation Areas.	The draft Local Plan policies provide for consideration of cumulative impacts of development, taking into account the significance of heritage assets and their setting.	No change.
Lewisham Park Crescent Residents	2	HE 02	25. Accordingly, and given the important role conservation areas play in shaping local urban character, and bearing in mind that the Council has a statutory duty to preserve the character of such areas; we would suggest including additional wording in this policy to clearly state that **Back gardens are private amenity areas that were the entire back garden to the rear of a dwelling or dwellings as originally designed. Back gardens in perimeter block urban typologies, which have more or less enclosed rear gardens, are considered an integral part of the original design of these types of residential areas; and provide valuable amenity space and an ecological resource.** **The development of back gardens, in perimeter form residential typologies within conservation areas, for separate dwellings, will not be granted planning permission.**	With respect to managing new development, the definition for garden land is set out in the Part 2 policy on High Quality Design. This should be read together with relevant heritage policies. The plan must be read as a whole.	No change.
Lewisham Park Crescent Residents	2	HE 02	26. For clarity, we recommend that the clear definition statement on p141 be once again reiterated in HO2: **"Garden land (including back gardens) comprises private amenity areas that were the entire back garden to the rear of a dwelling or dwellings as originally designed and that such garden land is not defined as Previously Developed Land, as set out in the NPPF.**	With respect to managing new development, the definition for garden land is set out in the Part 2 policy on High Quality Design. This should be read together with relevant heritage policies. The plan must be read as a whole.	No change.
London Wildlife Trust	2	HE 02	We support this policy. A similar issue occurs for 'Registered Parks and Gardens and London Squares' (para 6.28), where ecological issues should also be explicitly referenced as one of the values to consider.	Support noted.	No change.
Sydenham Society	2	HE 02	**HE2 Designated heritage assets (p165)** These are supported	Support noted.	No change.
Telegraph Hill Society	2	HE 02	We are generally supportive of this policy which covers the existing protections and adds a few such as mentioning	Support noted.	No change.

			gardens, fenestration patterns, ornamentation and views from the private realm.		
Telegraph Hill Society	2	HE 02	It is unclear to us from the definition on **page 822** whether a Conservation Area is regarded as a single heritage asset or a collection of heritage assets for the purposes of this Plan. If a Conservation Area is regarded, as simply a single Heritage Asset, which we think might be the reading from **HE2**, then it might be argued that neglect or damage to a single building does not constitute neglect or damage to the whole area and hence to the "heritage asset". We do not believe this is right. Neglect or damage to a single building is as much to be deplored as neglect or damage to the whole. The Plan should make it clear that a heritage asset such as a Conservation Area is also to be regarded as a collection of individual heritage assets	Conservation Areas comprise of 1 Designated Heritage Asset, so any harm has to be considered in terms of its impact on the whole (we do also recognise the potential for cumulative harm for many incremental instances of harm/erosion; as well as considering character areas). There may additional designated heritage assets within a Conservation Area, for example a listed building. Buildings within a Conservation Area may also be identified to be non-designated heritage assets – particularly if identified as positive contributors or locally listed. Further details are set out in national planning policy, guidance and legislation.	No change.
Telegraph Hill Society	2	HE 02	We consider that the new wording in policy **HE2.B.b**: supporting developments that "*so as not result in an adverse cumulative impact on the special characteristics of a Conservation Area, even if the development in isolation would cause less than substantial harm*" is less protective than the current UDP wording which it replaces which refuses development which "*in isolation would lead to less than substantial harm to the building or area, but cumulatively would adversely affect the character and appearance of the conservation area*". TELEGRAPH HILL SOCIETY RESPONSE TO THE DRAFT LEWISHAM PLAN Telegraph Hill Society 2 April 2021 Page 27 of 58 We imagine that the two are meant to be functionally identical, but this is not clear and we would wish the Council to retain the existing wording.	Agreed.	Local Plan amended as suggested.
Telegraph Hill Society	2	HE 02	We also note the use of the phrase "*special characteristics*". This was also used in the existing UDP although alongside references to "*character and appearance*" and with clarification that it included *"buildings, spaces, settings and plot coverage, scale, form and materials"*. In order to avoid debate over what such characteristics might be, we suggest that reference should be made to "special characteristics" having to take into account consideration of buildings, spaces, settings and plot coverage, scale, form and materials and consideration of any Conservation Area Character Appraisals (not merely the broader area characterisation studies carried out by the Borough). We also believe that the Conservation Area Character Appraisals need refining and more detail in order to protect Conservation Areas as intended. Such refinement, which might alternatively be included in Design Codes, should include, for example, the type of sash windows and window horns, the style of lintels, doors and roof	Noted. It is considered that this point is sufficiently covered by the policy as currently drafted.	No change.

			ornaments, the type of tiling, brick work and brick bonding. A more detailed approach would make it clearer to applicants exactly what is expected and reduce the level of work that the Planning Department needs to do on each application to ensure it meets the requirements of heritage conservation.		
Telegraph Hill Society	2	HE 02	It is unclear what the interaction is between policies **HE2.B** and **HE2.C** where a proposal includes both new development and retention of existing elements; **HE2.C** would be better worded to read "*Proposals for the retention of …".*	Agreed.	Local Plan amended as suggested.
Telegraph Hill Society	2	HE 02	Policy **HE2.C** is capable of alternative readings and we would suggest it would be improved and strengthened by the following deletion: *"Proposals involving the retention, refurbishment and reinstatement of features that are important to the significance of a Conservation Area will be supported."*	Disagree. The policy provides a positive approach to development in accordance with the NPPF.	No change.
Telegraph Hill Society	2	HE 02	We note that DM 36.5 and DM35.6 do not seem to be included in the proposed Plan.: 5. The Council will encourage the reinstatement or require the retention of architectural and landscaping features, such as front gardens and boundary walls, important to an area's character or appearance, if necessary, by the use of Article 4 Directions. 6. The Council will require bin stores and bike sheds to be located at the side or rear of properties where a front access to the side and rear exists. We strongly believe that these should be included in order to meet Strategic Objective F15. DM 36.5 provides a lever which can be used to negotiate improvements to proposals in line with Explanation in § 6.19DM36.6, whilst detailed, seeks to bar one of the worst issues currently marring the appearance of Conservation Areas.	Agreed.	Local Plan amended as suggested.
The Fourth Reserve	2	HE 02	**Area of Special Local Character - the Buckthorne Cutting meets the criteria:** **Area of Special Local Character - the Buckthorne Cutting meets the criteria** It is distinguished from the surrounding area or other parts of the borough which are nearby by the quality or extent of its' landscape • the Buckthorne Cutting landscape is unique. At one end (Section A) are veteran coppiced sweet chestnut trees that appear nowhere else along the 4km railway cutting. At the other end (Section B) is an extensive reed bed that has the unusual feature of sitting high on a hill. • the Buckthorne Cutting landscape is unique in that sections A and B are divided by the Eddystone Road bridge which is an Archeological Priority Area as it is part of a Roman Way. • the Buckthorne Cutting landscape is the last remaining remnant of	The Buckthorne Cutting will be assessed for consideration as an ASLC through proactive conservation work, in accordance with the process for identifying ASCL, which will be established in due course. The status of the Buckthorne Cutting in terms of open space and biodiversity/geodiversity is addressed elsewhere in the Consultation Statement.	No change.

			what was once Brockley Green (a historic name no longer on maps) • the Buckthorne Cutting landscape is unique in that it consists of a row of coppiced hedgerows with pleaches suggesting they were once a boundary hedge (Section A) - a boundary marker is present in Section B. • the Buckthorne Cutting trees are visible behind the historic building of the Brockley Jack as you approach from Sevenoaks Road/Blythe Hill - a vista that would have been the same for centuries and gives a sense of Lewisham's past. The area or group of buildings possesses an overall character with identifiable or distinctive architectural features which are worthy of preservation • the Buckthorne Cutting has 3 iconic historical buildings - St.Hilda's Church (Grade 2) at one end, the Rivoli Ballroom (Grade 2) at the other end and the Brockley Jack pub and theatre (AAP) in the middle. These buildings have several direct links to the railway cutting aside from their close proximity making this small section of Crofton Park (Brockley Green) a uniquely important landscape to Lewisham Borough and the local area.		
The St John's Society	2	HE 02	Conservation areas should not be kept in perpetuity, and a progressive approach to conservation is needed to balance the heritage concerns alongside the conservation of nature, energy, and community. Innovative and progressive strategies are needed both to enhance and enrich current heritage assets but there needs to be balance and importance placed on excellence in design.	Noted. Conservation Area Appraisals identify the significance of each area, what might cause harm and in recent CAAs an associated Management Plan. They are subject to periodic review and updating. The Local Plan is considered to take a positive approach to preserving and enhancing the historic environment, consistent with the National Planning Policy Framework and Historic England guidance. The presence of a Conservation Area does not preclude new development from being delivered within that area.	No change.
Deptford Society	2	HE 03	**Page 171** point A: Development proposals will ONLY be supported where they preserve or enhance...	Noted.	Local Plan amended as suggested.
Historic England	2	HE 03	Archaeology: We would note that the data underpinning the borough's Archaeological Priority Areas, as referenced in respect of Policy HE3 (non-designated heritage assets), at Schedule 3 and in relevant site allocations, dates back to around 1998. These therefore require revision, ideally as part of the Local Plan process. If not, the Local Plan should carry a	Noted. GLAAS are undertaking reviews of borough's APAs in line with revised approach in NPPF. Lewisham's APAs are expected to be reviewed in 2023.	Local Plan amended with additional supporting text to note that GLAAS will be reviewing APA

			‘health warning’ regarding the reliability of the currently mapped APAs.		in due course and that proposals should consider archaeology outside of APAs.
HopCroft Neighbourhood Forum	2	HE 03	LBL acknowledge that more should be done to improve historic environment stating: “*Better preserving the special qualities of places outside of Conservation Areas*“, yet do not include sites which have been pointed out at the character study workshop and since via various emails, e.g. Buckthorne Cutting which is a area of special local character and a special landscape character, and should be emphatically embedded into the Local Plan.	Part 2 sets out policies on Areas of Special Local Character. There are currently 12 ASLC identified within the borough. The Council will in the future adopt selection criteria for assessing all ASLC.	Local Plan amended to provide more information around the process for the identification of new Areas of Special Local Character.
Ladywell Society	2	HE 03	**Areas of Special Local Character** Request for addition to this category: the “Heath Estate”, Ladywell. This area of residential properties was built in the 1930a et seq. by the Heath Family of builders, who also lived in some of the houses. This area is bounded by the Blackfriars to Sevenoaks railway line to the west, Brockley Grove and Ladywell Road in the north and east, and Chudleigh Road in the south. The houses, predominantly of three bedrooms with front and rear gardens, vary in style, but are consistent along each road. The roads are named after children, grandchildren, nieces, nephews of the builders. A few alterations and extensions have taken place, but generally the area has retained its character.	Part 2 sets out policies on Areas of Special Local Character. There are currently 12 ASLC identified within the borough. The Council will in the future adopt selection criteria for assessing all ASLC.	Local Plan amended to provide more information around the process for the identification of new Areas of Special Local Character.
Ladywell Society	2	HE 03	**Article 4 Directions** All Areas of Special Local Character should be subject to Article 4 Directions, namely Article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 As Amended. It is noted that the London Borough of Bromley is consulting on an extensive extension of use of these directions in what it refers to as “Areas of Special Residential Character”. Lewisham Council should also do this in order to have greater or better control over additional storeys, extensions into gardens etc.	Support noted. Policy HE 1 states that the Council will use powers to available to appropriately manage new development and remedy unauthorised works. However, the making of Article 4 Directions is outside the scope of the Local Plan.	No change.
Lee Forum	2	HE 03	The plan commits to proposals that unjustifiably harm the significance of a non-designated heritage asset and its setting will be strongly resisted. - How will this work in practice? Why is the wording not stronger and more directive as to how this should be done?	The Government’s National Planning Practice Guidance (NPPG) sets out details and should be referred for further information.	No change.
London Wildlife Trust	2	HE 03	We support this policy.	Support noted.	No change.
Sydenham Society	2	HE 03	**HE3 Non-designated heritage assets (p171)** These are supported	Support noted.	No change.

Blackheath Society no 2	2	HE 04	**HE4 Enabling development**. Agree with policy.	Support noted.	No change.
Historic England	2	HE 04	HE4 Enabling development: By definition within the NPPF (para 202), enabling development is development that is not otherwise in accordance with adopted policy. We are therefore of the view that a policy on enabling development is not a necessary component of a local plan document. A local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy. Please see here for further advice on this subject: HEAG (historicengland.org.uk)	Noted.	Local Plan amended to remove the standalone policy on enabling development. However, a policy point is retained to signpost that the Council will use Historic England's latest standing guidance for assessing relevant proposals.
South East London Labour for a Green New Deal	2	HE 04	The plan discusses the necessity to balance the high density development required to achieve the borough housing target, as well as high-street and workplace areas, with the need to preserve local character and heritage areas. There are 24 conservation areas, which largely protect low density older housing increasingly in private ownership and out of reach of the majority of Lewisham residents (where the median income in 2018 was £29,000 and the 3rd lowest in London). This leaves for significant and high density development, brownfield sites, exiaitng estates, out-of-town retail areas or industrial estate. The plan allocates 50% of the housing targets to the north of the borough (plus 50% of the workspace and 44% of the high street uses). When combined with the allocations for the central area, they represent 80% of all development allocation in the borough. These areas are the most deprived and the north area of the borough is also one of the least accessible areas (PTAL(Post Transport Accessibility Level) 1-2). They are also areas identified with significant lack of green spaces. Such levels of development will have a significant impact on the environment and place experience, as well as create significant demand to protect and develop community infrastructure (including schools and health provision), local resources, green spaces and transport infrastructure. These areas form part of a London Plan Opportunity Area, however there is no coordinate masterplan or infrastructure requirement or planning policy framework. This pattern of development is likely to exacerabte existing inequalities in living environments across the borough	Disagree. The Local Plan is required to set out how the London Plan housing target will be met, along with other identified needs for development. The spatial strategy sets out an approach to delivering on identified needs, including the provision of site allocation policies, which is considered to align with the London Plan Good Growth policies. The plan must be demonstrably deliverable and the council has engaged with landowners to ensure sites are deliverable and developable, in accordance with the definitions set by national planning policy. The presence of Conservation Areas does not preclude new development from being delivered within them, however they do present certain limitations and constraints on development given higher level policies which require the local plan to conserve and enhance heritage assets and their setting.	No change.
Sydenham Society	2	HE 04	**HE4 Enabling development (p175)** Suggest that this is entitled "Enabling development of a heritage asset"; the policies are supported.	Noted. The policy point on enabling development is considered to be consistent with national planning policy	Local Plan amended remove the

				and guidance. The policy and supporting text make clear that this is in reference to heritage assets.	standalone policy on enabling development on advice of Historic England. However, a policy point on enabling development has been retained, incorporating the suggested change.
Telegraph Hill Society	2	HE 04	We consider the policy heading to be confusing and that it gives a wrong impression of what is intended. We would suggest that it would be better worded as “Securing the future of heritage assets”	Noted. The policy point on enabling development is considered to be consistent with national planning policy and guidance. The policy and supporting text make clear that this is in reference to heritage assets.	Local Plan amended remove the standalone policy on enabling development on advice of Historic England. However, a policy point on enabling development has been retained, incorporating the suggested change.
Telegraph Hill Society	2	HE 04	**Policy HE4** seems to use “Heritage Asset” in the confusing sense we outlined in paragraph 140. We are unclear as to whether it means that a Conservation Area is a single “heritage Asset” or that each building in a conservation area a separate heritage asset (or possibility only those buildings within the Conservation Area which contribute to the special characteristics of the Conservation Area). The ambiguity needs removing in order to ensure sufficient protection for individual buildings (assets) within a Conservation Area which, whilst not being of significance in their own right, contribute to the overall character of the Conservation Area.	Noted. The policy point on enabling development is considered to be consistent with national planning policy and guidance. The policy and supporting text make clear that this is in reference to heritage assets.	Local Plan amended remove the standalone policy on enabling development on advice of Historic England. However, a policy point on enabling development has been retained,

					incorporating the suggested change.
Telegraph Hill Society	2	HE 04	A reminder of the prohibition in **§ 6.10** (referred to in our paragraph 136) concerning neglect or deliberate damage should also be made in the Explanatory notes to this section.	Noted. The policy point on enabling development is considered to be consistent with national planning policy and guidance. The policy and supporting text make clear that this is in reference to heritage assets. The supporting text also provides the note on neglect or deliberate damage.	Local Plan amended remove the standalone policy on enabling development on advice of Historic England. However, a policy point on enabling development has been retained, incorporating the suggested change.
	2	HO	First, it is fully understood that the proposals help towards Lewisham meeting its housing targets and towards providing homes. However, it is not clear as to the percentage of 'affordable' homes are included in the plan.	Noted. The draft Local Plan policy HO3 sets out a strategic target for 50% of all new homes to be genuinely affordable.	No change.
	2	HO	The Council needs to take action on holiday letting services such as AirBnB. These reduce the number of long term homes available as well as distort an already dysfunctional housing market and rents. Where is the plan to deal with this problem?	Noted. Holiday letting of residential properties is outside the scope of the Local Plan. The Local Plan recognises the importance of conventional housing not being compromised by the unlawful use of residential premises and signposts to legislation which specifies that serviced apartments must not be occupied for periods of 90 days or more within a calendar year.	No change.
	2	HO	There is no denying the housing crisis in Lewisham. By its own figures 7.6% of Lewisham households are categorised as homeless. The average house price is way in excess of a reasonable multiple of the median income. The housing market does not function efficiently but the Council plans to continue relying on the goodwill of private developers. There will in effect be no change to current practices. It is time to recognise that doing the same thing over and over will provide the same end result – unaffordable housing and homelessness. Lewisham's Local Plan is a huge missed opportunity.	Noted. The Local Plan acknowledges the issues around housing affordability. As with local authorities in London and across England, local housing needs will be met through new house building both by the public and private sector. The draft Local Plan sets out a strategic target of 50% of all new homes to be genuinely affordable, based on local income levels. As part of this approach the Local Plan sets policies on housing estate renewal and regeneration. The Council has also embarked on an ambitious home building programme to build new genuinely affordable homes.	No change.
	2	HO QD 04	Have we learnt nothing from Grenfell Tower? The increased rush to build further densely populated tower blocks when current issues of poor quality, unhealthy mould and dangerous cladding still remain unresolved and flood risk with these blocks being built so close to the River. Developers sadly	Noted. The London Plan acknowledges that tall buildings will make a contribution to meeting the Capital's housing needs. It directs Boroughs to identify locations suitable for tall buildings and set parameters around height and design,	No change.

			cannot be trusted particularly when enforcement cannot be done. Prince Philip said, many years ago, there was a danger of over population which would bring increased problems. Yes, this requires housing but the magnet of London should not confine itself to reactionary indiscriminate building. It is the poor, disadvantaged, homeless and renters who tend to suffer. Housing needs sufficient complementary assets such as local shops (to avoid unnecessary travel) and create a Community. Health facilities, Schools and increased accessible public transport and for mental health, sufficient play and open natural areas, particularly for occupants on the highest tower blocks. Sunlight is very important. This should be done by the Developer not salving their conscience by paying CIL money or whatever for a Council to do, when they do not own sufficient land to do it. HMOs and back garden 'homes 'are replacing Family homes in disproportionate quantities. More individual people crammed into small boxes need additional facilities and green space. The Licencing system seems to be circumvented? This is also adversely affecting the Character of the Area.	which is reflected in the Local Plan. The Local Plan also adopts the London Plan housing standards. The Local Plan acknowledges the issue of harmful overconcentration of HMOs and includes policies to address this. The Council has introduced Article 4 Directions in some parts of the Borough to remove permitted development rights for conversion of small homes in to HMOs, and may consider extending the extent of the area in the future. The Council has prepared an Infrastructure Delivery Plan to help ensure growth takes place in a sustainable way, including provision of social infrastructure, community facilities and open spaces to meet the levels of growth planned. Licencing and planning enforcement are outside the scope of the Local Plan.	
	2	HO	[B] - Urban Planning - Accommodation For Early Years Children - During the last decade awareness of the importance of " child early years development " has advanced. Now a consensus of informed opinion is that early age child development needs far more attention. I suggest Lewisham should take this view as a strategic policy objective in all fields, including the planning of the urban fabric. The following is the consideration of early years development in urban planning. [C] - Housing and Early Years Development , Family Housing - I therefore propose Part 2 , 7 Housing , HO6 Accommodation for families - and subsequent renumbering HO7 Accommodation for older people, etc. HO6 Accommodation for families - This section I believe should consider matters that will enhance the wellbeing of children, in particular early years children. The majority of family homes at some time will accommodate early years children from newborn babies to children under 5 years old and this fact should be an important consideration in the design of the accommodation for families. An import aspect is that in the future many homes for families will not have the front door a ground level. I believe any family home that does not have a front door at ground level should	Noted. The draft Local Plan adopts the London Plan housing standards, including for indoor and outdoor amenity space and children's play space. It also sets out policies on safe and inclusive design, ensuring homes are made accessible to all and adaptable to the changing needs of people over their lifetime, including families with children. It is therefore not considered necessary to add in a new detailed policy in the Local plan regarding the design of family accommodation. However it is acknowledged that further clarification could be provided to refer the needs of families with children.	Local Plan amended by making reference to family housing and the needs of families and young children.

			be served by a lift to facilitate both early years access and mobility access. As an efficient method of communicating my thoughts on this subject , I will describe a section through what I consider to be the tallest acceptable building form for the accommodation of family homes - [1] - Ground Floor - Ground level accommodation - such as mobility flats , welfare facilities , local shops , local hospitality rooms , studio /craft accommodation , very light industry . To achieve the diverse weave of the healthy urban fabric. [2] - First Floor - Family maisonettes accessed by front doors on a corridor served by a lift. The maisonettes are to have a generous external balcony, oriented south if possible. Corridor could be extended by bridging into other blocks, if achieved with considerable design skill. [3[- Third Floor - Family maisonettes accessed by front doors on a corridor served by a lift. The maisonettes are to have a generous external balcony, orientated south if possible. [4] - Fifth Floor , roof deck level , building forms set back to be unseen from ground level viewing or made a very occasional visually interesting event - Accommodation with a set back profile served by a lift. Such as early years play areas external / internal, creche room, craft room, clothes drying accommodation, community room, storage rooms, etc. The above building section is of a five storey building that I consider is the very highest that is acceptable in a housing environment. Higher buildings will damage the ambience of domestic wellbeing, particularly relevant to the matter of the wellbeing of early years children and all young people. The ground level landscaping in such a housing environment is a critical matter. Contemporary landscape design techniques are able to achieve excellent results. In such a landscape the occasional single storey building, probably with a pitched roof can be an asset in achieving the ambience of domestic wellbeing that is required.		
	2	HO	**Housing Development** • Affordable housing should not be provided by selling off any more public land. This is a one-time only benefit and feeds into the long term increase in land value inequalities which benefit only owners and developers to the detriment of the majority of residents and the rest of nature. • The Planning Department needs to be given sufficient resources to uphold decisions and constraints and	Noted. Property acquisition from private landowners, planning department resources / planning enforcement, and the detailed nature of apprenticeships (e.g. gardening) are outside the scope of the Local Plan. The London Plan introduces a small sites housing target for all London boroughs, and its policy H2 compels boroughs to boost the delivery of housing on small sites. The Council has	No change.

			monitor developments. This is particularly important if the Council is going to rely on many small developments as well as some larger ones to fulfil its housing quota. Infringements by developers in this area have been largely ignored e.g. Churchwood Gardens. There should be zero tolerance of changes to social housing provision after planning permission has been granted. • The Council should lobby the London Mayor and Assembly and the Government to tighten the rules and penalties of land hoarding. Our precious green spaces are often under threat when there is hoarded land with planning permission sitting undeveloped nearby. • It is difficult to believe in the Council's commitment to 'sensitive intensification' given its record in supporting the Corporation of London's proposals for developments of Mais House and Otto Close, which are totally insensitive to both the community and natural environment of the Sydenham Hill Ridge area. • All housing developments should be required to use up to date energy efficiency measures (which will obviously change over time). • All housing developments should be required to provide habitats for wildlife that uses buildings e.g. swifts, sparrows, starlings, house martins, pied wagtails, bats, mason bees etc. This would include green roofs, swift bricks, bee bricks etc. • All housing developments of more than one building, should include green outdoor space that residents can actively engage with. We need to move away from sterile, soulless, easy maintenance shrubs and non-native small trees, and think more about wildflower meadows, community orchards, mixed hedgerows not fences, flexible growing areas for residents who want to garden and similar. Green spaces that residents want to be in and get involved with are fundamental to mental health. When they are provided at a very local level, it becomes more possible for children to play outside again, without it involving an adult supervised journey to a park. Such spaces would also reduce the excess pressure on the local nature reserves like One Tree Hill and Sydenham and Dulwich Woods, which has caused so much damage from trampling and thoughtless dog walkers, particularly over the past year. • The Council should provide gardening apprenticeships that include valuing and working with the existing fauna and flora, rather than ignoring or destroying it. • It should be recognised that brownfield sites, especially those that have been out of use for any time, may have become important natural habitats. Each site needs to be examined on its own current environmental merits, and not just a paper evaluation based on what its previous use might have been.	prepared a Small Sites SPD to support this approach and ensure new development is sensitive to its local context. The Local Plan requirements for energy efficiency in new developments are set in line with the London Plan. The Local Plan adopts the London Plan housing standards for internal and outdoor amenity space, and children's play space, along with introducing new requirements for urban greening and net gains in biodiversity. In addition, the plan identifies areas deficient in access to open space and sets out policy interventions to address this. The Local Plan prioritises the use of brownfield land for new development, thereby ensuring green and open spaces are protected. The plan makes clear that planning applications to be accompanied by assessments so that consideration can be given to ecology, landscaping, and public realm on a site by site basis.	

	2	HO	On 10th March it is recorded that the Small Sites Supplementary Planning Document was approved by the Mayor and Cabinet. What is the implication of this approval? What is defined as a “small site”? What is the policy linked to this approved document? Why did it need to be approved in advance of the Local Plan? Is Rushey Green – Bradgate Rd on page 259 of the consultation document considered to be a small site? Should we infer that the approval of this document means that a planning application to build 119 units in a tower at Bradgate Road can be given fast track approval to the detriment of the residents	The Small Sites SPD has now been adopted by the Council. It can be a material consideration when determining planning applications. The London Plan introduces a small sites housing target for all London boroughs, and its policy H2 compels boroughs to boost the delivery of housing on small sites, including through the preparation of briefs and design codes for small. The adoption of the SPD does not imply that planning permission will be granted on specific schemes. It is a tool to help support housebuilders and ensure that small site development is appropriate to its local context. The proposed site allocation for land at Rushey Green and Bradgate Road is roughly 0.5ha in size and not a small site by definition.	No change.
	2	HO	All this talk in the Local Plan for ‘affordable’ housing seems a bit naïve when facing this kind of development. I have also read they were not even designed to be ‘owner occupied’, but as investments for overseas buyers. What could more comprehensively destroy local communities? I, for one, used to go to Lewisham a lot to visit, eat and shop. I do not do that anymore. It’s too depressing. Developers contributing to the local stress on infrastructure: I agree that all developers should contribute towards relieving the increase density that they will be producing, with some adding surgeries for instance, or support for transport links.	Noted. The draft Local Plan acknowledges the issues around housing affordability. It therefore sets out a strategic target of 50% of all new homes to be genuinely affordable, based on local income levels. The Infrastructure Delivery Plan has been prepared to identity the level of infrastructure needed to accompany housing growth and the Local Plan recognises that CIL and planning obligations from private developers will be needed to help pay for it.	No change.
	2	HO	EMPTY PROPERTIES: Again, GRANTS are the solution. All kinds of people and in particular young couples would happily engage with the idea of restoring an empty property if they had some assistance to do so. It could be an obligation to occupy the property for a while after, or else opportunist developers would rapidly move in. There used to be a number of grants of this kind that seem to have been stopped. This would have an immediate effect, it would attract individuals and couples, rather than companies, thereby protecting the ‘affordable’ aspect. The current ‘affordable’ label is a misnomer. It seems developers are encouraged to sell a number of their apartments cheaper, but once they have been bought, they can then be sold on later for market price, so that does not work more than once round. When they are obliged to ‘rent’ at affordable prices again, there is no method to ensure someone is not ‘renting’ to then sub-let, on to someone else. There appears to be no monitoring process.	Noted. Grants, rents, sub-letting and sales of private housing are outside the scope of the Local Plan. The Local Plan seeks to address many of the issues raised in the representation, including by: setting a strategic target for 50% of all new homes to be genuinely affordable; signposting that the Council will use powers available (i.e. enforcement) to bring vacant units to back into use; encouraging developers to market new housing units for sale or rent to existing local residents and workers before advertising them more widely to others (although Council exercises no legal control over this); and using S106 agreements to define the amount, tenure and type of affordable housing delivered on new sites. The Council is undertaking an ambitious home building programme to build new genuinely affordable homes on Council owned land. Policies on estate regeneration and renewal are set out in the Local Plan.	No change.

			Also, current legislation to protect part- ownership seems to be inadequate with people stuck unable to sell. People who buy these properties are usually the most vulnerable of all. They might have a lump sum after a divorce, or too tiny an income to get a proper mortgage. What happens? There is no control over Developers that merely inflate the price of the property. The vulnerable buyers cannot haggle, there could well be a queue, the developer knows this. So, the vulnerable buyer ends up with a MUCH smaller percentage of the property than they should. This is a form of theft. Part-ownership properties on the market, should be obliged to use INDEPENDENT SURVEYORS to price the property correctly. EXAMPLE: I have had a friend who was 'done' like this. I was also buying a property at the same time and had the cash to buy it property outright. I was able to negotiate and was offered a flat in a far more desirable and expensive area for £145K. (2009). It had 3 ample bedrooms, a large sitting room, a separate kitchen and bathroom. It had allocated parking and was 3 min walk from a tube station. My vulnerable friend with an £80K divorce settlement and a mental condition that made her unable to work, ended up only buying 25% of an apartment in Leytonstone, nearly 30 minutes from a tube (you needed to take a bus). It comprised one tiny bedroom, with space for a double bed and a chair, no wardrobe or anything else, a tiny sitting room/ kitchen and an even weenier bathroom. It was a new build which had been priced by the developer at £170K! Had she tried to haggle, he would simply have called out "next!" She would have lost it. The developers know this and take advantage. At that time it was probably really worth about £110K. They inflate the value to suit themselves and this is totally unacceptable. I now know of at least 3 others who had a similar experience. Some rule has to be introduced that if you are marketing a part- ownership property there has to be an independent pricing system in place. STOP THE SALE OF COUNCIL PROPERTIES please! I also would be very happy if council properties were no longer sold at all! It has been a disastrous policy that has removed a huge numbers of truly affordable homes, especially for families. These council houses and flats were and some still are, essential for all kinds of people including front-line staff, be they emergency, medical, police, nurses care workers, you name it! Previous special police apartments for instance, were gradually closed down. Big mistake. The same for nurses, who used to have lodgings offered by the hospitals. Maybe this is something the council could look at this and build some apartments designed for essential workers at affordable rents and run like council properties	The Government has introduced 'right-to-buy' legislation which allows council tenants to buy their home at a discount – the Council exercises no control over this.	
	2	HO	We are at saturation point for high rise buildings, which offer nothing to the borough and provide limited accommodation	Noted. The London Plan acknowledges that tall buildings will make a contribution to meeting the Capital's housing	Local Plan amended to

		QD 04	suitable for anyone but transient singles and buy to let investors. You are letting down the majority of people that live in the borough – students, young sharers, families, those on Council House waiting lists if you only promote 1 and 2 bed units with limited space and no gardens. Its social engineering and discriminatory.	need. It directs Boroughs to identify locations suitable for tall buildings and set parameters around height and design, which is reflected in the Local Plan. The Council has prepared a Strategic Housing Market Assessment that has considered local housing needs and the results of the study have influenced the policies in the draft Local Plan. These address need for a wide range of groups, tenures and types, e.g. affordable housing, older persons, students, specialised and supported, shared living (HMOs), gypsy and travellers. However it is acknowledged that further guidance could be provided on housing size mix. The draft Local Plan generally seeks to resist development proposals where they comprise solely studio or 1 bedroom units and recognises that new housing development must meet, and where possible exceed, the housing standards in the London Plan.	include a target housing size mix.
	2	HO	I'd also be interested to hear whether there will be any restrictions in the leases for the houses/flats build to stipulate that they must be owner occupied for a number of years.	Noted. The leasing of properties is outside the scope of the Local Plan, but the Council does use S106 Agreements to define the amount, tenure and type of affordable housing.	No change.
	2	HO	Housing: The housing section correctly identifies that the majority of housing in the borough is now in 1 or 2 bed units and that the majority of the recent new development in the Borough has been 1 and 2 bed flats. It also highlights that there has been a significant rise in private rented accommodation in the Borough much not of a decent home standard and that there has been a problem with a rise in HMOs especially in the southern part of the Borough, now covered by an Article 4 Direction. The draft plan also outlines the significant amount of overcrowding and the large number of families registered with the Council as needing an affordable home. We support the policy of protecting family sized accommodation and of wanting a proportion of units on the identified housing sites to be family units, but given the identified need for family units the policies and proposals should be much stronger and give a target for 3 and 4 bed units for each large site identified in the plan and make it clear that these should be houses with gardens or at the very least ground floor access town house/maisonettes below flatted units above in perimeter mansion blocks or similar each family unit having private outdoor space. All residential units should have private amenity space in the guise of a balcony, terrace or garden or an openable winter garden and minimum sizes should be specified. Adding where possible to policies is a cop out.	Support noted. The Council has prepared a Strategic Housing Market Assessment (SHMA) that has considered the need for family housing and the results of the study have influenced the policies in the Local Plan. The plan includes policies which protect against the loss of family sized housing units. However it is acknowledged that further guidance could be provided on housing size mix. The Local Plan specifies that new housing development must meet, and where possible exceed, the London Plan housing standards, including for internal and outdoor amenity space, and children's play space. It also sets requirements to ensure that residents within mixed tenure schemes have access to amenities, communal spaces and play spaces, and that access (i.e. cores and lifts) to affordable housing and market units is indistinguishable. The Local Plan includes requirements for sustainable design and construction, which are considered to be in conformity with the London Plan.	Local Plan amended to include a target housing size mix.

			All residential units should be built to Passivhaus Design, going beyond BREEAM excellent. You should also consider using a policy requiring the use the London Energy transformation Initiative which looks at the embodied carbon, the operational energy of the project and the active measures to reduce energy consumption which are then monitored and measured over time. At least one London Borough (Haringey) is looking to add such a policy to its Local Plan. We support the principle of negotiating as high a proportion of social rented homes on each housing site as possible and that these should be of a design which is tenure blind with all units being equally able to access all the related play areas and communal open space, you should also outlaw segregated cores, lift access.		
Culverley Green Residents Association	2	HO	**Housing** The housing section correctly identifies that the majority of housing in the borough is now in 1 or 2 bed units and that the majority of the recent new development in the Borough has been 1 and 2 bed flats. It also highlights that there has been a significant rise in private rented accommodation in the Borough much not of a decent home standard and that there has been a problem with a rise in HMOs especially in the southern part of the Borough, now covered by an Article 4 Direction. The draft plan also outlines the significant amount of overcrowding and the large number of families registered with the Council as needing an affordable home. We support the policy of protecting family sized accommodation and of wanting a proportion of units on the identified housing sites to be family units, but given the identified need for family units the policies and proposals should be much stronger and give a target for 3 and 4 bed units for each large site identified in the plan and make it clear that these should be houses with gardens or at the very least ground floor access town house/maisonettes below flatted units above in perimeter mansion blocks or similar each family unit having private outdoor space.	Support noted. The Council has prepared a Strategic Housing Market Assessment that has considered the need for family housing and the results of the study have influenced the policies in the draft Local Plan. However it is acknowledged that further guidance could be provided on housing size mix. The draft Local Plan specifies that new housing development must meet, and *where possible exceed*, the standards for private outdoor space in the London Plan. Private gardens will not be feasible for all housing units, such as flatted development.	Local Plan amended to include a target housing size mix.
Culverley Green Residents Association	2	HO	**There's no commitment to solving (at least partially) Lewisham's local housing shortage** Part of the justification for the plan is the shortage of housing in Lewisham. We have not been able to find an analysis but it seems that a significant part of the problem is overcrowding. The Plan should demonstrate how the new developments will reduce this. Left to developers, most of the new buildings will be composed of small flats: this will not necessarily help reduce the local shortage. CGRA would ask what quality of life such units will give young families?	The London Plan sets out a housing target for Lewisham. The Local Plan sets out policies and identifies specific sites to meet this target, and to address housing need / supply in the borough. The Council has prepared a Strategic Housing Market Assessment that has considered local housing needs, including the issue of overcrowding, and the results of the study have influenced the policies in the draft Local Plan. For example, the Local Plan seeks to resist development proposals where they will result in the loss of a family housing unit or comprise solely studio or 1 person 1 bedroom units. There are also policies to covering HMOs.	Local Plan amended to include a target housing size mix.

				However it is acknowledged that further guidance could be provided on housing size mix. The Local Plan adopts the London Plan housing standards, including minimum space standards.	
Deptford Society	2	HO	- Pressure to deliver housing seems to be warping proper planning, both in terms of scrutiny and to accommodate other uses such as light industry and business, as well as protection of green space etc. - We welcome the attention given to housing for different types of users; however flexible, adaptable housing is just as important, if not more so - There is no specific mention of how the response to the climate emergency will be reflected in the plan for housing delivery.	Noted. The Local Plan must demonstrate how a significant uplift in housing will be facilitated to meet the housing target for Lewisham. It sets a strategy to deliver Good Growth, in line with the London Plan, taking into account needs for the local economy, green infrastructure, etc. The draft Local Plan includes a policy on inclusive and safe design, which covers standards for wheelchair user dwellings and accessible/adaptable dwellings. Addressing the climate emergency is a key strategic objective of the Local Plan. There are policies included throughout the plan to address this, including the Part 2 chapter on Sustainable design and infrastructure.	No change.
Greater London Authority	2	HO	**Housing** The Mayor welcomes the borough's intention to meet its London Plan housing target of 1,667 units/year (Table 4.1). For the 15-year Plan period it has identified Site Allocations delivering 25,000 units. Over 27,000 units could be achieved, if sites in Bell Green/ Lower Sydenham supported by Phase 2 of the Bakerloo Line Extension are included. However, references to local housing need as per Government Standard Methodology appear unnecessary and confusing, as within London the London Plan is responsible for 3 establishing and distributing London's housing requirement across the capital. This is underpinned by London Plan Policy H1(A) and para 4.1.2. The Mayor notes that the council's monitoring of 'windfall' development on small sites (para 7.21) matches the London Plan's small sites target of 379 units/year (Table 4.2), and that the council will prepare SPDs to facilitate appropriate development of small sites.	Support for the housing target and small sites target are noted.	Local Plan amended to remove references to the standard methodology for Local Housing Need, and make clear that the Local Plan will ensure delivery against the London Plan housing target for Lewisham.
Lee Forum	2	HO	Population changes and housing need is dynamic. Over twenty years much can change. The London Plan runs from 2019 to 2041. The annual housing targets, are set for only the first ten years of the Plan. This reflects the capacity of land suitable for residential development and intensification identified in the 2017 Strategic Housing Land Availability Assessment (SHLAA) which, due to the dynamic nature of London's land market, does not attempt to robustly identify capacity beyond 2029. Whilst the council reports it will be keeping the Plan updated there are clearly points at which reviews will be needed. Targets will be adjusted. The council needs to join with other boroughs and ensure that targets reflect available land and are	Noted. The Local Plan seeks to deliver on the London Plan 10-year housing target for Lewisham. The National Planning Policy Framework provides that there must be a 5 year supply of 'deliverable' sites identified, and from years 6-10 and beyond, 'developable' sites and broad areas for growth. The Council is required to review its adopted Local Plan every five years, in line with government legislation. Any future review will take into account changes to regional and national policy, as well as new or updated evidence.	No change.

			fairly allocated across London so that intensification is not detrimental to Lewisham local communities.	The Council has a legal obligation to liaise with adjoining and other boroughs on strategic matters, and has done so through the Duty to Cooperate.	
Lee Manor Society	2	HO	We are concerned that ambitious housing targets will make Lewisham even more of a dormitory suburb with many residents having to travel outside the borough to work. We note suggestions at several points for mixed developments. Unless meticulously planned, these can lead to residents objecting to certain industrial and leisure uses forcing them to shut down or relocate.	Noted. The Local Plan seeks to make provision for a sufficient supply of land and sites to meet the London Plan housing target. Appropriately located and well-designed mixed-use developments are considered necessary to deliver the spatial strategy. The Local Plan also sets out approaches to grow the local economy and create more jobs, including by protecting and enhancing employment areas and town centres. The Local Plan policy on amenity and agent of change seeks to ensure new developments protect the amenity of existing and future occupiers and uses as well as neighbouring properties and uses.	No change.
Lewisham Liberal Democrats	2	HO	3. There must be a clear plan to reduce Lewisham's own housing shortage through these building works	Noted. The Local Plan seeks to make provision for a sufficient supply of land and sites to meet the London Plan housing target.	No change.
Residents of Sydenham Hill	2	HO	b) **Small Sites development** We are alarmed by the promotion of the development of small sites, particularly in the very special area of Sydenham Hill, and on the larger gardens of the few grand houses which remain here. These houses serve as a reference to the history of the area, particularly in relation to the Great Exhibition site at the end of Sydenham Hill at Crystal Palace, and to Paxton's achievements with the railway tunnels which are heritage assets. We have noted with deep concern that the Lewisham Characterisation Study ignored these landmark buildings on the ridge, which are also appreciated by visitors to the area for walking, rambling and to enjoy what remains of the Great North Wood.	Noted. The London Plan sets out a strategic housing target for Lewisham, which includes a component small sites target. The Local Plan must demonstrate how the targets will be met. To help ensure that small sites development is delivered sensitively and in response to local character, the Council has adopted a Small Sites SPD.	No change.
Residents of Sydenham Hill	2	HE	**Categorisations of Sydenham Ridge maps taken from the plan**	Noted. Response to further detailed representations set out elsewhere in the Consultation Statement.	Local Plan amended to identify Sydenham Hill Ridge as an Area of Special Local Character.
	2	HO 01 QD6	**HO1 Meeting Lewisham's Housing Needs** I welcome and support the need for more housing, including affordable housing. But optimising site capacity (QD6) must not be at the expense of amenity space and commercial and employment provision which are required to provide mixed communities, especially on strategic sites such as Leegate. I support the desire for housing choice (HO1F), and I would welcome policies which require developers to include housing for specific groups such as the elderly (e.g. over 50s?) to encourage mixed communities and to promote downsizing within the borough. I welcome the resistance against studio or 1bed/1 person units and against an over concentration of 2	Support noted. The Local Plan states that the optimal capacity of a site must be considered having regard to the type and nature of uses, however it is recognised that this policy could be strengthened with reference to the delivery of the spatial strategy. The Local Plan does not require a specific percentage of housing on each site to be for older people but the policy on older people's accommodation seeks to address the needs of this group, having regard to the indicative London Plan target in Lewisham for older people's accommodation.	Local Plan amended to make clear that the optimal capacity of a site is the most appropriate form of development that responds positively to the site's context

			bed units for sale but question how this will be implemented in reality. I am pleased to see that adherence to minimum space standards is embedded in the draft Plan.		and supports the delivery of the spatial strategy for the Borough.
	2	HO 01	Lewisham's target of 50% "genuinely affordable homes" for new developments is very positive, although the Plan also says that, "the threshold level of affordable housing on gross residential development, which is not on public sector land, is set at: a minimum of 35 per cent". This will mean that the majority of new developments in the borough will only need to provide 35% "genuinely affordable homes" in new developments. There is no justification for this lower target in the Plan and we believe that the borough should aspire to a 50% target of "genuinely affordable homes" for all sites not just council-owned. If existing residents are to be burdened with the intensification of their neighbourhood, it must be in the name of social good and not just for developers to profit. There is no clear vision in the Plan of an ideal private development which provides a high proportion of genuinely affordable homes. We were disheartened to see on Page 122 of the Plan a photograph of the Lendlease/Timberyard (also known as Deptford Landings) development in Deptford which has now ground to a halt despite just 10% of the flats being classed as "affordable" The existing residents in the Pepys estate are now forced to live next to a permanent construction site. If this is the kind of development being championed by the Plan, we do not believe Lewisham council's aspirations are high enough.	Noted. The strategic target for genuinely affordable housing is set at 50%, informed by findings of the Lewisham SHMA. The 35% threshold is established by the London Plan and its viability tested route for affordable housing delivery. The Local Plan must be in general conformity with the London Plan. The Local Plan cannot influence development which has already been granted planning consent. It is acknowledged that larger sites may be built out in phases over several years, and this may impact on local amenity if not appropriately managed. The photos included in the draft Local Plan are provided for illustrative purposes only and do not carry material weight for planning decisions. As the plan is progressed through the next stages of the process, the Council may take the opportunity to update these, subject to resources available.	Local Plan amended with additional policy on 'considerate construction' to help protect local amenity.
	2	HO 01	It's also very concerning about the planning proposals which have been put in for the British legion. This land could be used to build social houses for the community. The need in Lewisham is for housing for families not more one bedroomed flats. The local plans should incorporate the need to build houses with gardens not more flats especially on small pieces of land which already have houses. Social housing needs to be dispersed around the borough not concentrated on a few areas. If pieces of land like the British legion are used for social housing it will integrate more communities. Local people are not against building near them it's just needs to be sympathetic to the local environment and meet the needs of local people rather than developers who want to squeeze as many one bed flats onto the plot.	Noted. Decisions on planning applications will be dealt with through the Development Management process, having regard to the extant development plan. The Council has prepared a SHMA that has considered the need for family housing and the results of the study have influenced the policies in the Local Plan. For instance, the plan seeks to resist developments comprising solely of 1 bedroom flats, studio dwellings, and the loss of family housing units. However it is acknowledged that further guidance could be provided on housing size mix. The Local Plan specifies that new housing development must meet, and *where possible exceed*, the standards for indoor and outdoor amenity space set out in the London Plan.	Local Plan amended to include a target housing size mix.

				The draft Local Plan seeks to ensure inclusive and mixed neighbourhoods by requiring new housing developments to maximise genuinely affordable housing and make provision a mix of tenure types.	
Blackheath Society no 2	2	HO 01	**HO1 Meeting Lewisham's housing needs**. D: Strategic target of 50% "genuinely affordable" housing. Admirable aim but is it realistic (especially given past performance [around 20% overall] and increasingly conflicting policies); and can it not be defined, explained and articulated more clearly so as to address site specificity and viability constraints, so as not to raise unrealistic expectations?	Noted. The affordable housing target has been informed by evidence of need, as set out in the Strategic Housing Market Assessment. It is a starting point for negotiations with developers, recognising that the London Plan Viability Tested route for major applications provides that 35% affordable housing may be acceptable in principle.	No change.
Brockley Society	2	HO 01	Page 185, paragraph C (g) (I): This paragraph overstates the position. A net loss of housing in numerical terms may be acceptable if there is an increase in the kind of housing actually required by people in the borough, e.g. family housing gained by returning houses which have been split into flats back to being single dwellings.	Noted. The policy states that there must be no net loss of housing floorspace (rather than units). This provides flexibility to enable the conversion of flats into family sized units, where appropriate.	No change.
Brockley Society	2	HO 01	Page 186, paragraph E: This paragraph should be strengthened so that 1 or 2 bedroom units are only permitted in areas where they are actually needed. Currently, paragraph E(c) implies that the fact that an area includes family housing is itself a justification for permitting new 1 or 2 bedroom flats. That is misconceived: the question should be whether the area needs even more family units, and if it does, the provision of new 1-2 bedroom units should be resisted.	Noted. The suggested approach is considered to be overly restrictive and not consistent with the National Planning Policy Framework. Lewisham's Strategic Housing Market Assessment indicates a need for family sized homes as well as 1-2 bedroom units across the Borough. However it is acknowledged that further guidance could be provided on housing size mix.	Local Plan amended to include a target housing size mix.
Home Builders Federation	2	HO 01	**Lewisham's Housing Target:** Lewisham's target is 16,670 net housing completions (or 1,667 net new homes per year). This is in conformity with the target for ten year set by the London Plan, for the period 2019-20 to 2028-29. This is set out in table 4.1 of the London Plan. HBF agrees that this is a sound approach. Lewisham Council should plan to provide 1,667 net additional homes a year in its new Local Plan. It should roll this figure forward for any period-of-time that the Local Plan operates after this first ten years. The Council will need to do this as its plan is intended to operate over the period 2020-2040 (see page 18 and paragraph 1.39). However, it is expected that the Local Plan will be reviewed within five-years-time to reflect a review of the London Plan.	Support noted.	No change.
Home Builders Federation	2	HO 01	**HO1 Meeting Lewisham's housing needs** We generally support the approach outlined in Part A that establishes a target for the period 2020-2030, although we do note that the London Plan targets does start in 2019/20. The Council should say something about how it will manage delivery after this and what housing target will be used. In line with the London Plan, the Council should roll forward the annual figure of 1,667 net additions a year, although we hope	Noted. A housing trajectory will be included in the Regulation 19 document. This will identify the latest 5-year housing land supply position with the appropriate buffer, and also take account of the expected rate of delivery of homes against the housing target over the plan period. The London Plan was adopted in 2021 and forms part of our development plan and sets the latest housing target for Lewisham.	Local Plan amended to reflect that new London Plan housing targets take effect in 2019/2020. A housing trajectory has

			that a new London Plan will have been adopted by this point. It should state this in the text of the policy to avoid any doubt. If a new London Plan is adopted before 2030cand the housing targets updated, the Lewisham Local Plan should state that it will incorporate automatically this new target without the need for a review of the Local Plan. Part D sets a strategic target for 50% of all new homes to be 'genuinely affordable homes'. We will discuss affordable housing in our response to HO3 but the Council will need to account for the Government's policy on First Homes which will constitute 25% of the overall affordable housing element. This will need to be set at a price that is 30% lower than market value, or either 40 or 50% lower, subject to a local justification for this. We have noted the *Sites Allocations Background Paper 2021.* It is unclear from Appendix A how many of these sites have detailed planning permission. The Council will need to be confident that it has a deliverable supply of housing sites to support implementation during the first ten years of the Local Plan. The Council will need to provide a statement of its five-year housing land supply for the Regulation 19 version of the local plan. The Council will need to prepare a housing trajectory for the Regulation 19 version of the Local Plan.	The Council does not accept that First Homes are an affordable product for Lewisham.	been included in the Regulation 19 document. Supporting text amended to indicate that the housing targets in the Local Plan may be reviewed should a new London Plan come into force during the plan period.
London Borough of Bromley	2	HO 01	It is noted that draft policy HO1 aims to meet and exceed the London Plan minimum ten-year target of 16,670 net housing completions over the period 2020 to 2030; and that delivery against Lewisham's Local Housing Need figure is maximised. Paragraph 7.9 expands on this, noting that, through the Duty to Cooperate, Lewisham are taking the opportunity to continue engaging with neighbouring and other planning authorities to understand whether they are, or will be, in a position to assist in accommodating any residual local housing need arising in Lewisham that may need to be addressed outside of the Borough. This approach to meeting housing need is incorrect in the London context. London Borough housing targets are set out in the London Plan. The GLA identify the London-wide strategic housing need (which is not disaggregated to Borough level) and then aim to meet this need as far as possible, taking into account the housing capacity available in each Borough through the SHLAA.	Noted. The London Plan (2021) housing target for Lewisham will be reflected in the Local Plan as the strategic housing requirement. The Local Plan provides that the London Plan housing target for Lewisham can be met entirely within the borough i.e. there is no unmet need that would have to be addressed from other London boroughs or local authority areas. The Council will continue to work with London Borough of Bromley on strategic planning matters through the Duty to Cooperate.	Local Plan amended to remove references to the standard methodology for Local Housing Need, and make clear that the Local Plan will ensure delivery against the London Plan housing target for Lewisham. Supporting text amended to clarify that Lewisham will not rely on

			The Local Housing Need figure is currently irrelevant for London Boroughs. Paragraph 1.4.4 of the London Plan makes this clear: *"The London Plan is able to look across the city to plan for the housing needs of all Londoners, treating London as a single housing market in a way that is not possible at a local level. In partnership with boroughs, the Mayor has undertaken a Strategic Housing Land Availability Assessment to identify where the homes London needs can be delivered. Ten-year housing targets have been established for every borough, alongside Opportunity Area plans for longer-term delivery where the potential for new homes is especially high. Boroughs can rely on these targets when developing their Development Plan Documents and are not required to take account of nationally-derived local-level need figures."* Planning Practice Guidance1 (PPG) is also clear that the Mayor, through the London Plan, is responsible for establishing London-wide need and disaggregating this to Boroughs: ***"Is a cities and urban centres uplift applied in London and if so, how does it work?*** *Yes, an uplift applies in London. London is unique in that it has no single city centre which can carry need for the city area. Therefore a 35% uplift is applied to the entire SDS area (which covers all the London boroughs), rather than to the local authority which contains the largest proportion of London's population. However, it should be noted that the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual boroughs so there is no policy assumption that this level of need will be met within the individual boroughs…* ***How should local housing need be calculated where plans cover more than one area?*** *…Where a spatial development strategy has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to re-visit their local housing need figure when preparing new strategic or non-strategic policies.* *The London Plan was examined under the NPPF 2012 as per transitional arrangements. This issue is noted in paragraph 131 of the London Plan panel report2:* *"Owing to the transitional arrangements for spatial development strategies the local housing need assessment referred to in the 2019 NPPF is not directly relevant to the current calculation of need in London. Furthermore, whilst the 2016 household projections post-date the SHMA, the PPG provides that a change in the housing situation does not automatically mean that assessments are rendered out-of-*		other boroughs to meet its housing target.

			date. There are too many uncertainties surrounding the implications of Brexit for it to be factored in." *Therefore, the local housing need process would not apply, at the earliest, until the London Plan is reviewed. Even then, the PPG3 allows for alternative approaches to assess housing need, so it cannot be assumed that the local housing need figure would definitely apply in future.* *The fact that the Secretary of State (SoS) did not direct changes to the London Plan in relation to housing need or targets is a clear sign that MHCLG accept the approach to meeting housing need in the adopted London Plan. The written ministerial statement of 16 December 20204, which also introduced the updated method of establishing local housing need, explicitly referenced London, and noted that the focus in London is on the medium and long-term, i.e. the next iteration of the London Plan:* *"In the short-term we expect to agree the London Plan with the Mayor early in the new year which will set his plan for, amongst other things, meeting London's housing need. This will support greater ambition in London, but alone won't go nearly far enough to meet need in London. We now need to focus on the medium and long term and create a plan to better address London's housing needs, whilst protecting the character of London's communities, particularly in outer London, and London as a place for families."* *Looking at the recent City of Westminster Local Plan inspector's report5, it is clear that the approach detailed above has been applied. Westminster proposed a housing target in excess of their London Plan target, and the inspector's concluded that this approach was not appropriate, referring to the section of the PPG set out above.* *In summary, Lewisham should not plan for additional housing above and beyond the London Plan housing target where this additional housing cannot be met within Lewisham. For avoidance of doubt, Bromley do not have capacity to meet any unmet housing need from Lewisham.*		
London Borough of Tower Hamlets	2	HO 01	The proposed focus on creating additional affordable housing is encouraged and was a major focus in our own Local Plan. This is considered to be particularly important due to Lewisham's increased housing targets and the need to ensure contributions for affordable housing coming from new developments. While the increased housing numbers may be difficult to achieve, Tower Hamlets is not in a position to take any additional housing figures from Lewisham, as we have the highest targets of any London Borough. We believe that the	Noted.	Local Plan amended to remove references to the standard methodology for Local Housing Need, and make clear that the Local Plan will

			proposed Bakerloo line extension will provide an opportunity for more transit-oriented housing development to brought forward. It should also be noted that London Plan housing targets should be prioritised over borough need.		ensure delivery against the London Plan housing target for Lewisham. Supporting text amended to clarify that Lewisham will not rely on other boroughs to meet its housing target.
NHS (HUDU)	2	HO 01	**HO1 Increasing Housing Supply** As outlined earlier in this response the retail and employment studies should be revisited, in light of the paradigm shifts which potentially offer new housing supply opportunities which could then be included within the policy.	Noted. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues. The latest GLA population projections continue to forecast growth for London over the long-term, despite short term impacts from Brexit and Covid-19.	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections.
Royal Borough of Greenwich	2	HO 01	The supporting text of Policy HO1, at paragraph 7.9, asks whether neighbouring local authorities are in a position to accommodate any residual housing need arising in Lewisham. We can confirm that Royal Greenwich is *not* in a position to accommodate any of Lewisham's residual housing need.	Noted. The London Plan (2021) housing target for Lewisham will be reflected in the Local Plan as the strategic housing requirement. The Local Plan provides that the London Plan housing target for Lewisham can be met entirely within the borough i.e. there is no unmet need that would have to be addressed from other London boroughs or local authority areas. The Council will continue to work with Royal Borough of Greenwich on strategic planning matters through the Duty to Cooperate.	Local Plan amended to remove references to the standard methodology for Local Housing Need, and make clear that the Local Plan will ensure delivery against the London Plan housing target for Lewisham.

					Supporting text amended to clarify that Lewisham will not rely on other boroughs to meet its housing target.
Sydenham Society	2	HO 01	**H01 Meeting Lewisham's housing needs (p187)** These policies are supported with the proviso that the retention and retrofitting of existing housing stock is explored in order to reduce the effects of climate change. In line with LBL's declaration of a climate emergency, there should be a greater emphasis placed on zero carbon developments.	Noted. The draft Local Plan supports sustainable retrofitting measures to existing buildings. The Local Plan requires major development proposals to be net-zero carbon by applying the energy hierarchy, in line with the London Plan.	Local Plan amended with additional policy to emphasise the importance of sustainable retrofitting of existing building stock.
The St John's Society	2	HO 01	HOUSING How will the borough's response to the climate emergency will be reflected in the plan for housing delivery? Growth and striving to meet net zero appear to be at odds here. Housing growth must not come at the expense of well-placed industry, amenity and businesses and loss of green spaces.	Noted. Climate change adaptation and mitigation is addressed throughout the draft Local Plan, and reflected in the Good Growth policies of the London Plan. Specific design requirements are largely set out in the draft Local Plan Part 2 sections on Sustainable design and infrastructure, and Green infrastructure. The Local Plan requires major development proposals to be net-zero carbon by applying the energy hierarchy, in line with the London Plan.	No change.
TIDE CONSTRUCTIO N LTD	2	HO 01	Policy HO1 – Meeting Lewisham's Housing Needs *Part F (Housing Choice)* Part F(e) of the draft policy states: *To help ensure that local residents and other people have access to a wide range of suitable housing provision, the Council will encourage developers and agents to market new housing units for sale or rent to existing local residents and workers before advertising them more widely to others.* This element of the draft policy wording is overly onerous and unrealistic. Developers cannot be expected to market new homes to local residents only. There should be no requirement or encouragement within the policy to do so, as this is not consistent with the nature of the housing market, which is led by supply and demand. With the above in mind, we suggest that point (e) at Part F of the policy is deleted.	Noted. The Local Plan only encourages, and does not require, developers to market units for sale or rent to local residents or workers. Planning permission will not be contingent on this, and therefore the policy point is not considered onerous.	No change.
	2	HO 02	I am concerned, particularly as a resident of Lewisham Park, that the designation of gardens must be explicitly expressed. It	Noted. The draft Local Plan includes policies that seek to protect and enhance the network of green infrastructure. It	No change.

			unsuitable for development. I am aware of pressure to provide housing but squeezing tiny dwellings into spaces intended as amenities to existing houses is strong. However, the number of suitable gardens will surely be tiny, but the impact on neighbours and wildlife will certainly be destructive...	strongly resists developments that will result in the loss of garden land, and identifies the exceptional circumstances where the loss of garden land would be acceptable in principle.	
Blackheath Society no 2	2	HO 02	**HO2 Optimising the use of small sites**. Use of 'optimise' in relation to use of land is a weaselly way of saying achieve high density housing/more affordable homes. How are planning officers and councillors to tell the difference between optimise and maximise, and to trade off this requirement against other stated policies that conflict with it to achieve "sensitive intensification"? Extension to smaller sites under HO2 will be a new challenge. HO2 B is very vague in the absence of promised planning guidance. HO2 C is a tough test if all of conditions a to h are required.	The terminology for 'optimising' is established by the London Plan. The draft Local Plan policy QD6 makes clear that the optimal capacity of a site is not the maximum capacity. These policies will need to be read together. The Council has now adopted the Small Sites SPD, which will help to ensure such development responds positively to the site and its local context, including local character.	No change.
Blackheath Society no 2	2	HO 02	Housing conversions as envisaged in HO E may be a useful extra means of intensification, but there should be a minimum space standard (e.g. 100m²) for a re-provided 3+ bedroom family sized unit (HO2 E b), which probably makes the proposed 130m² for the existing building (HO2 E a) too small: 150m² needed.	Noted. Conversions will be required to meet the nationally described space standards, which are reflected in the London Plan and Local Plan. The benchmark figure provides a basis for considering the size of housing that would be suitable for conversion in this instance – this is included in the extant Development Management Local Plan and has been absorbed into the new Local Plan.	Local Plan amended to clarify this is 130 m2 of the original building.
Brockley Society	2	HO 02	Page 193, paragraph C: This policy must appropriately safeguard heritage assets. Suggested amendment: *c. Respond positively to local character, including historical character, and comply with requirements and guidance for heritage assets where applicable;*	Noted. By referring historical character as a key consideration, heritage will need to be considered, with reference to the Part 2 Heritage policies. The Local Plan must be read as a whole. A reference to heritage assets will be added for clarity.	Local Plan small sites policy amended to specify heritage assets, for clarity in implementation.
Brockley Society	2	HO 02	Page 194, paragraph E: This is generally welcome, but conversions should not be permitted where the amount of outdoor space would be reduced. We suggested amending as follows: *d. In the situation garden land or other outdoor amenity space is available, the extent of and access to this amenity space…*	Noted.	Local Plan amended as suggested.
Home Builders Federation	2	HO 02	**HO2 Optimising the use of small housing sites** The policy should refer to the London Plan small sites target for Lewisham in table 4.2 of the London Plan. This requires 3,790 homes on sites of 0.25ha in size or smaller over the period 2019-28/29 or 2020/21 – 2030/31 for Lewisham's Local Plan. This is an extremely important component of London's overall housing requirement. The Council will need to do more to support the delivery of this quota on small sites. Allocating more small sites is also an important element of national policy to improve housing delivery by increasing the opportunities for SME housebuilders, who have suffered most since the advent of the plan-led system. The Council must do more to support housing delivery on small sites by identifying and allocating more sites. It is possible that some of the sites listed in	Noted. The policy supporting already text makes reference to the London Plan small sites target for Lewisham. The Council takes a positive view on and will seek to facilitate small sites development, both through the preparation of the Local Plan and planning guidance. The Council recently adopted the Small Sites SPD to support this approach. The Council has published an Action Plan in accordance with the requirements following the Housing Delivery Test.	No change.

			Appendix A of the *Sites Allocations Background Paper 2021* may be on sites of 0.25ha in size or less, but this is unclear. We do note, however, that table 5.1 of this document states that small sites have been excluded from this assessment. This is unfortunate. We acknowledge that this can be difficult, especially when land ownership is uncertain, but the Council could allocate some of its own landholdings, sub-dividing these if necessary, to provide opportunities for SMEs. We observe that against the Housing Delivery Test 2020 that Lewisham will need to publish an action plan setting out how it will improve delivery. Taking active steps to allocate more small sites would assist with this.		
London Wildlife Trust	2	HO 02	We support this policy, and welcome the reference in para 7.26 that proposals "*should not have an unacceptable adverse impact on biodiversity and green infrastructure*."	Support noted.	No change.
Telegraph Hill Society	2	HO 02	The Characterisation Study defines areas on a spectrum of sensitivity to change, based on local character and taking into account factors such as existing urban gain, historic evolution, building typologies, and spatial strategic growth and regeneration priorities across the Borough. However communities are equally important if the vision of Lewisham as "*a place where all generations not only live but also thrive … a place that people want to visit and live in, and where they choose to stay and enjoy a good quality of life"* (**page 48**) is to be achieved and if the Borough is to meet the **Strategic Objectives** set out in **G16** to **G19**. Indeed, preservation and support of local communities is fundamental to addressing the wider determinants of physical and mental health and improving the well-being of the population (**Strategic Objective G16)** as noted in paragraph 27.	Noted. The Lewisham Characterisation Study mainly considered the physical character of the Borough to inform the Local Plan and its spatial strategy, which is principally focussed on the land-use framework. It is agreed that the diversity of local communities is important, and there are a number of policies within the plan that address social aspects of sustainability. The plan must be read as a whole.	No change.
Telegraph Hill Society	2	HO 02	Before the previous UDP, which put a more effective hurdle of subdivision than is now proposed, we saw an increasing level of conversions of properties in the Conservation Area into flats with up to 50% of the houses being so converted in most streets. These flats were predominately taken up by single people or couples without children or by let out to students at Goldsmiths College: the social fabric and community of the area was noticeably eroded by the new, mainly transient population, those single people or couples occupying the flats tended to move, often reluctantly, away from the area once they had children. The policy entirely eroded the Council's aspirations, as far as our area was concerned, for people to remain in an area for a significant time. The general effect was to push up the prices of the remaining houses both as developers competed to buy then and because those who wished to buy a complete house found the pool of possible properties diminishing. The situation was developing whereby there were only cheap flats and very expensive houses and	Noted. The draft Local Plan is being prepared within a new planning policy framework since the UDP and current Local Plan were adopted, respectively. It is also informed by updated studies, including on evidence of housing need, along with a new and significantly higher housing target. The Part 2 Housing policies seek to make provision for a wide range of housing types, tenures and sizes in addressing identified needs. However it is acknowledged that further guidance could be provided on housing size mix. The draft Local Plan proposes to adopt the London Plan housing standards, which include outdoor amenity space and children's play space. Policy HO2.D.e sets out that in situation of conversions where garden land is available, access to this private amenity space is maintained for the	Local Plan amended to include a target housing size mix. For housing conversions, Local Plan amended to clarify this is 130 m2 of the original building

			nothing in between, with no migration path between one and the other and the consequential departure of residents from the area in search of cheaper family homes. Worried about this trend and its effects on the community, the Telegraph Hill Society was instrumental in the campaign for a block on further flat conversions which was ultimately introduced in the last UDP. Since the introduction of the UDP policies this trend has reversed to some extent with flats being converted back into houses and no new subdivisions. Were such subdivisions allowed again, we believe the trend previously observed towards the erosion of the local community would recommence. Given the importance of local communities, and particularly the vibrant community in Telegraph Hill, we are therefore deeply concerned with the proposed introduction of this policy. More generally flat conversions of even larger properties exchange quality larger family homes for poor quality smaller flats and homes, which simply by virtue of being conversions cannot be as good as purpose-designed flats. Few modern developments in Lewisham include replacement houses with 4 or 5 bedrooms. Equally few new developments incorporate houses with gardens as, in order to maximise density, most are flats in tower blocks. The policy will therefore reduce the supply of larger houses with gardens and push the prices of those up further still and out of the range of even more families. We would further note, as we have stated in paragraph 29, the impact of COVID-19 has permanently changed the way people work, and many more people will now be working from home for ever and hybrid mixed home/office working is projected to become the norm. Occupiers will expect their properties to be usable for this purpose and we anticipate that will significantly increase the demand for extra space and extra rooms. A 130 sq m property will not be sufficient to meet the demand for a family size accommodate with one or two people working partly or wholly from home. We strongly believe, therefore, that the existing policy of resisting flat conversions in general should be retained. If, despite our strong objections, the proposed policy is included, the minimum level for the size of properties which can be converted should be set higher (150 sq m) or there should be a limit for the maximum amount of flat conversion allowed in any area (or maybe street) set at, say, 50%. If a Borough-wide policy like this is not acceptable, then at the very least, Conservation Areas should be exempted from the	existing family unit, and wherever possible, made accessible to residents in other units. Conversions will be required to meet the nationally described space standards, which are reflected in the London Plan and Local Plan. The benchmark 130sqm figure provides a basis for considering the size of housing that would be suitable for conversion in this instance – this is included in the extant Development Management Local Plan and has been absorbed into the new Local Plan. It is not considered that a blanket restriction on conversions within Conservation Areas is appropriate, as this would be inconsistent with the National Planning Policy Framework in setting a positive approach to development. The Part 2 Heritage policies are considered to provide a sound basis for preserving and enhancing the significance of heritage assets, including Conservation Areas.	

			conversion policy in order to prevent the type of issues we have highlighted above in our area.		
Telegraph Hill Society	2	HO 02	If, despite our objections, an area-based limit is all that remains in this policy, we want it noted that, since additions such as loft extensions etc. add to the space/area, there is an opportunity for developers to progressively get around any remaining protection by first adding an extension, thereby increasing the gross internal floor area to above 130sq m. To prevent this "e*xisting dwelling*" should be replaced by "*original dwelling*".	Noted.	Policy amended as suggested, to refer to original building.
Telegraph Hill Society	2	HO 02	With respect to policy **HO2.E**, we have examples of where houses suitable for families have been turned into HMOs and then the HMO turned into flats, the latter being justified because the definition in the existing DM3 and the proposed **HO2.E** refers to the "*conversion of a single family house/dwelling*". HMOs can be easily converted back into single family dwellings whereas flats cannot. We believe that the wording now used which includes "*or self-contained unit with 3+ bedrooms*" would scope in most HMOs into this policy. If this is not however the intention, the policy should re-written so as to ensure HMOs are included within the ambit of this policy. We accept that policy **HO9.A** seeks to resolve the issue by not allowing larger housing to be converted into HMOs. However (a) conversion into an HMO only loses housing for single family homes on a more temporary basis that flat conversion, and only allows it because policy **HO2.E** is drawn in such a way as not to preclude HMOs being converted into flats, and (b) the wording of HO9.A is more widely drawn than the wording of policy **HO2.E.** So, for example, at present a family house could be turned into an HMO if it complies with policy **HO9.A** and then turned into flats without the provision of a family sized unit because **HO2.E** does not apply.	Noted. An HMO is not self-contained housing by definition, in accordance with the Housing Act 2004. Noted	Policy H02.E has been amended to make clear that the gross conversion of a single family dwelling, or self-contained unit with 3+ bedrooms, into smaller self-contained residential units (including flats) will only be supported where the gross internal floor space of the existing original dwelling is 130 sq. metres or greater. Specifying 'the original' dwelling mitigates the issue raised regarding the conversion of HMOs into flats
Transport for London	2	HO 02	E(e) and 7.31 - We support the policy of conversion of single-family dwellings or 3+ bedroom units to flats or smaller self-contained units. However, growth in housing should not be prevented due to parking stress as stated in the London Plan	Noted.	Local Plan amended by deleting policy point HO2.E(e)

			parking policy T6. Parking controls such as Controlled Parking Zones (CPZ) should be implemented to address parking stress from additional growth, and permits should be limited to existing residents. Therefore, we do not support housing growth being conditioned upon additional parking accommodation or on-street parking availability as noted in sections E(e) and 7.31.		and paragraph 7.31
Residents of Sydenham Hill	2	HO 02	1. Housing targets We understand that Lewisham's housing targets have been set by and/or agreed with the London Mayor. We ask the Council to reconsider whether there is truly the need for these high targets and/or the speed of delivery, given that: 1. The Bakerloo Line Extension has been delayed indefinitely 2. There are empty homes in Lewisham 3. There are currently unused office and retail units which might be redeveloped as homes 4. The impact of Brexit has not yet been assessed for housing need.	Noted. The London Plan sets a housing target for Lewisham, which the Local Plan must seek to deliver on. The Local Plan must be in general conformity with the London Plan. The spatial strategy is not contingent on the delivery of the BLE, however the Local Plan does seek to enable its delivery to make a more optimal use of land and support growth and facilitate new inward investment. Whilst recognising there may be empty homes that could be brought back into beneficial use, it is unlikely that the amount of empty properties would be sufficient to significantly affect housing delivery targets, or preclude the need to identify new development sites. Lewisham's evidence base documents (such as Employment Land and Retail Needs assessments) suggest the need to retain and create more commercial floorspace – therefore, the Local Plan does not generally seek to encourage the conversion of existing commercial properties solely for housing. Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections (which consider impacts of Covid-19 and Brexit, as much as reasonably possible).	No change.
	2	HO 03	If delivery of genuinely affordable housing is a clear corporate priority for Lewisham Council then The Local Plan needs to set a strategic target for 50 per cent of all new homes delivered in the Borough to be locally defined as housing at social rent levels, below the GLA's London Affordable Rent level. This would recognise the distinctive characteristics of the local housing market and the relative affordability of different types of provision to the resident population. All other housing products below market levels, whether for sale or rent, are defined as intermediate housing, and should not be conflated with genuinely affordable housing. To be clear, a target of 50% of all new homes built to be 'genuinely affordable', which is defined as housing at social	Noted. The draft Local Plan sets a strategic target of 50% of all new homes to be genuinely affordable, with affordability linked to local income levels. This target is informed by the Lewisham Strategic Housing Market Assessment. The plan sets out that in Lewisham genuinely affordable housing is housing at social rent levels or the GLA London Affordable Rent level (in Lewisham this is GLA London Affordable Rent minus the 1 per cent above Consumer Price Index uplift). The Council has procedures for designating Conservation Areas, these are outside the scope of the Local Plan. The draft Local Plan includes policies to safeguard strategic industrial sites and ensure no net loss of viable industrial capacity.	In accordance with the Metropolitan Open land Review Additional Sites Report, Buckthorne Cutting, including the Old Scouts Hut, has been designated as proposed Metropolitan

			rent levels (which is set on the basis of local income levels); this means that intermediate and market housing products would not be considered as genuinely affordable. I support the designation of the Bellingham Estate as an Area of Special Local Character and we support further consideration to making this a Conservation Area. The Industrial Estate in Bellingham is a successful employment zone. The designation needs to be reinforced. Local Green Space and Metropolitan Open Land needs to be designated at Coutrai Road in Crofton Park and along the railway cuttings from Forest Hill, Honor Oak Park through to New Cross Gate.		Open Land, which has the same level of protection as Green Belt.
	2	HO 03	Lewisham's target of 50% 'genuinely affordable homes' for new development is very positive, although the Plan also says that, 'the threshold level of affordable housing on gross residential development, which is not on public sector land, is a set at: a. A minimum of 35%'. This will mean that the majority of new developments in the borough will only need 35% 'genuinely affordable homes' in new developments. There is no justification for this lower target in the Plan and we believe that the borough should aspire to a 50% target of 'genuinely affordable homes' for all sites not just council owned. If existing resident are to be burdened with the intensification of their neighbourhood, it must be in the name of social good and not just developers to profit.	Noted. The draft Local Plan strategic target for genuinely affordable housing is set at 50%, informed by findings of the Lewisham Strategic Housing Market Assessment. The 35% threshold is established by the London Plan and its viability tested route for affordable housing delivery. The Local Plan must be in general conformity with the London Plan.	No change.
	2	HO 03	It is good to set a target that 50% of new homes should be "affordable" but that should be the minimum. In reality it's the same as the current target which Lewisham does not meet it. Even in developments where the Council has a direct financial interest it fails to meet its own target. How will it actually meet the re-stated target? References to "genuinely affordable" homes are welcome but again, the Council has failed to meet the existing targets. The intermediate categories (London Living Rent / shared ownership) in reality do not meet Lewisham's needs. Allowing 30% of supposedly affordable homes to be from the intermediate category is an abject failure.	Whilst the adopted and draft Local Plan set affordable housing targets for the Borough, the delivery of affordable housing fluctuates on a yearly basis. It is very much dependent upon development viability, availability of grant funding, and landowner interest in bringing forward sites (e.g. the development pipeline). The Council has embarked on an ambitious home building programme to build new genuinely affordable homes. The Council has prepared a SHMA that considered local housing needs and identified that a range of tenure types are required in Lewisham, including shared ownership. The Local Plan is in conformity with policy H6 of the London Plan which specifies a tenure split of 30% low-cost rent, 30% intermediate products and the remaining 40% to be determined by Councils. In recognition of the need for genuinely affordable housing in Lewisham, the Local Plan seeks that all of the remaining 40% is for low cost rent, thereby minimising intermediate provision as much as possible.	No change.
	2	HO 03	New housing redevelopment needs to be at least 60% to 80% socially rented at Council levels and secured tenancies.	Noted. The Council has prepared a Strategic Housing Market Assessment that considers the need for affordable	No change.

			At 100% on Council owned land. Refer to DNA housing policies.	housing and tenure mix, which has informed the Local Plan's strategic target for genuinely affordable housing at 50%. Viability evidence indicates that requiring social rented accommodation at the levels suggested in the representation is not viable, and therefore any such policy requirement would be unsound. Neighbourhood plans are required to be in conformity with the strategic policies of the Local Plan.	
	2	HO 03	Social Housing Lewisham's target of 50% "genuinely affordable homes" for new developments is very positive, although the Plan also says that, "the threshold level of affordable housing on gross residential development, which is not on public sector land, is set at: a minimum of 35 per cent". This will mean that the majority of new developments in the borough will only need to provide 35% "genuinely affordable homes" in new developments. There is no justification for this lower target in the plan. There appears no clear vision in the Plan of an ideal private development which provides a high proportion of genuinely affordable homes. We were disheartened to see on Page 122 of the Plan a photograph of the Lendlease/Timberyard (also known as Deptford Landings) development in Deptford which has now ground to a halt despite just 10% of the flats being classed as "affordable" The existing residents in the Pepys estate are now forced to live next to a permanent construction site. If this is the kind of development being championed by the Plan, we do not believe Lewisham council's aspirations are high enough.	The strategic target for genuinely affordable housing is set at 50%, informed by findings of the Lewisham SHMA. The 35% threshold is established by the London Plan and its viability tested route for affordable housing delivery. The Local Plan must be in general conformity with the London Plan. The Local Plan cannot influence development which has already been granted planning consent. It is acknowledged that larger sites may be built out in phases over several years, and this may impact on local amenity if not appropriately managed. The photos included in the draft Local Plan are provided for illustrative purposes only and do not carry material weight for planning decisions. As the plan is progressed through the next stages of the process, the Council may take the opportunity to update these, subject to resources available.	Local Plan amended with additional policy on 'considerate construction' to help protect local amenity.
Blackheath Society no 2	2	HO 03	**HO3 Genuinely affordable housing**. Encouragement of developers to seek grant funding to boosts level of affordable housing is welcome (HO3 D). It is good to be specific about the need for a suitable mix of tenure types (Genuinely Affordable 70% v Intermediate 30%) with a strong bias towards rentable. But this still leaves a lot of room for confusion, lack of comparability and "smoke and mirrors". Surely every application should be required to quote clearly and publicly how much affordable housing it is offering in total on a consistent basis (e.g. how much the offering is worth expressed as social housing), excluding and including any grant funding/public land contribution. The same should apply to any other public benefit the scheme is offering e.g. community facilities, infrastructure improvements. It would then be possible for the public and councillors to better understand and assess the total value of public benefit offered by each	Noted. All planning applications must clearly set out the level of affordable housing to be delivered (units and floorspace), as well as details on non-residential uses proposed, where applicable. Planning applications and decisions are made public, and are available on the Council's webpage. The supporting text to draft Local Plan policy HO3 sets out that viability assessments must be made publicly available.	Noted.

			scheme on a transparent, comparable basis, helping explain/justify clearly any intensification or other trade-offs and assist evaluation of the net public benefit of a scheme. Viability reports (which should be published for transparency) are not very accessible for non-experts to understand.		
Blackheath Society no 2	2	HO 03	HO3 L: In seeking Inclusive and mixed neighbourhoods and communities and seeking to alter tenure and/or mix, should the Council not also take account of need/demand (and even cost) in the area of each application and make transparent and public what it is aiming to achieve when using this power, including value for money? Is new housing being provided in the right places for the right people (especially existing residents in need) and for the right reasons? Is the annual target under the Plan going to be publicly split between Areas, tenure types, etc. and will it report against these in the Authority Monitoring Report? This links to HO2 I regarding off-site provision.	Noted. In considering tenure mix, the Council will take into account the policy requirements along with evidence of need set out in the Strategic Housing Market Assessment. The monitoring framework included in Part 4 of the draft Local Plan provides that housing delivery on both large and small sites will be measured across the borough and by neighbourhood sub-area. This will inform views as to whether development is supporting the delivery of the spatial strategy, and where necessary, the need for policy changes through the local plan review process.	No change.
Culverley Green Residents Association	2	HO 03	We support the principle of negotiating as high a proportion of social rented homes on each housing site as possible and that these should be of a design which is tenure blind with all units being equally able to access all the related play areas and communal open space, you should also outlaw segregated cores, lift access	Supported noted. The Local Plan is clear that affordable housing should be designed and built in a way that is indistinguishable from market housing. The Local Plan seeks to ensure all residents within mixed tenure schemes have shared access to amenities, communal spaces, including play spaces.	No change.
Deptford Society	2	HO 03	**Page 200** HO3J: Introducing a requirement for affordable housing on even the smallest sites is a big experiment. The impact on viability - and the long term quality of housing stock - must be an issue. Smaller projects use smaller scale builders operating on tight margins, and there is far less opportunity for economies of scale or repetition on small infill projects. Not only that, but meeting Building Regs and other statutory requirements on small constrained sites is often far more complex, and therefore more expensive. Too much pressure on the bottom line could lead to poorer quality construction and building failures in the future, or even sites remaining undeveloped. By far the primary benefit of residential development on small sites is the greater efficiency in use of (usually) brownfield land, often near public transport. This should take precedence over the very small increase in numbers of affordable dwellings that such sites could offer.	The Lewisham SHMA indicates a significant and acute need for more genuinely affordable housing in the borough. To help address this need, the Local Plan requires that new housing developments delivering less than 10 dwellings should seek to deliver on-site affordable housing wherever practical and feasible. Where provision cannot be delivered on-site, a financial contribution will be sought.	No change.
Greater London Authority	2	HO 03	The Mayor also welcomes that the draft Plan reflects the London Plan's strategic 50% affordable housing target and the threshold approach to viability (Policies H4 and H5). However, Policy HO3(F) of the draft Local Plan should also specifically refer to a 50% threshold for public sector land.	Noted.	Local Plan amended to include a 50% threshold for the viability tested route on public sector land.
Home Builders Federation	2	HO 03	**HO3 Genuinely affordable housing** Part A refers to the Threshold Approach to Affordable Housing / Fast-Track Route introduced by the London Plan, Policy H5.	Noted.	Local Plan amended to include a 50% threshold for

			This is welcome. The policy should refer to the requirement for 50% affordable housing on land in public ownership in keeping with Part B of Policy H5.		the viability tested route on public sector land.
Home Builders Federation	2	HO 03	**Small sites** Part J requires contributions to affordable housing on sites of 10 homes or fewer. This is contrary to national policy. National policy (NPPF, para. 63) exempts minor proposals from providing affordable housing. The Lewisham Local Plan should adhere to the national policy. The London Plan via policy does not require minor developments to contribute to affordable housing, although it allows this as an option for London boroughs to explore. The planning policy landscape for small developers is complex. This militates against delivery. Accordingly, the average scale of housing development with planning permission in the UK has increased in size by 17% in less than a decade according to recent research by the HBF in 2017. The issue is not purely one of cost (viability) but the time it takes to navigate the planning system to secure an implementable planning permission. Research by Lichfields published in September 2020 found that it takes up to 60 weeks to determine small site applications (sites accommodating between 10 and 150 homes). See Lichfield's Report *Small Sites: Unlocking Housing Delivery*, September 2020. In view of the importance the London Plan attaches to small site delivery – 12,000 homes a year on small sites – or 23% of London's overall requirement, the Council will therefore need to remove obstacles to delivery.	Noted. Lewisham's Strategic Housing Market Availability assessment makes clear that there is an acute and significant need for more affordable housing in the borough. The draft Local Plan therefore proposes that small housing developments make a contribution to affordable housing to help address this need. The approach is considered to be viable, as set out in the draft Local Plan viability assessment study. To clarify expectations and inform the Local Plan viability assessment update, the Regulation 19 plan will include further details on the level of contributions sought. To help facilitate the delivery of small sites and speed up the planning approvals process, the Council has prepared a Small Sites SPD.	Local Plan amended to clarify requirements on small sites contributions for affordable housing. Local Plan viability assessment updated to consider latest policy approaches and development viability information.
Home Builders Federation	2	HO 03	**Vacant Building Credit** The Council proposes to dis-apply the Vacant Building Credit (VBC) although this is a mechanism introduced in national policy (NPPF, para. 63) to incentivise the re-development of brownfield land by reducing the affordable housing requirement. Exemption from this is not something that an applicant should have to demonstrate. London is under-delivering housing compared to its need. The most recent AMR for London shows that just 35,699 net new homes were delivered in 2018/19 against a target for 42,000dpa and an objective need for 49,000dpa (based on the London Plan 2016). Last year – 2019/20 – according to MHCLG, some 41,000 net completions were achieved across all of London compared to a target for 52,000dpa and a objectively assessed need for 66,00dpa. See also the table below reproduced from the AMR for 2018/19:	Noted. The Council considers that the application of Vacant Building Credit is not appropriate for Lewisham. Further details on the justification for its limited and use are set out in the supporting text for draft Local Plan policy HO3.	No change.

			LB Lewisham officer note: Table 3.1 is included in the original representation. It shows total net housing delivery in London. Although Lewisham has performed well against its London Plan targets, London's track record overall in meeting its housing targets has been poor. Because London is a single-housing market area, this is important. Local government in London collectively needs to do more to assist housing delivery by speeding-up the decision process and incentivising the re-development of brownfield sites.		
Home Builders Federation	2	HO 03	**Tenure** Part E (b) of the policy discusses the tenure mix for affordable housing for large sites. We note that Part E (c) refers to the Council's Housing Strategy as another guide for the tenure mix. The tenure mix should be written into the Local Plan rather than contained in a non-development plan document. Paragraph 64 of the current NPPF requires at least 10% of homes to be available for affordable home ownership. The Council will have to update this policy to reflect the requirements of the Government's First Homes policy.	Noted. Draft Local Plan policy HO3 makes clear the expectation for housing tenure mix for the affordable housing element on major development, although it is acknowledged it does not specify a housing size mix. The Council does not accept that First Homes are an affordable product for Lewisham.	Local Plan amended to include a target housing size mix.
Lewisham Liberal Democrats	2	HO 03	4. A commitment must be made that a large proportion of the new residential units will be genuinely affordable with a set percentage of affordable housing and that the numbers planned will be responsive to demographic changes (for example, the decline in London's population as a result of Brexit/Covid)	Noted. The draft Local Plan sets a strategic target of 50% of all new homes to be genuinely affordable, with affordability linked to local income levels. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues. However, the latest GLA population projections suggest continued growth in London over the long term.	No change.
London Borough of Southwark	2	HO 03	The approach to sustainably managing development is supported. Southwark supports Lewisham's approach to affordable housing and the requirement for 35% affordable housing. Southwark and Lewisham have agreed in their Statement of Common Ground that they can meet or exceed the total numerical housing target assigned to them by the Mayor of London in the Draft London Plan, within the confines of their own administrative boundaries.	Support Noted. The Council will continue to work with London Borough of Southwark on strategic planning matters through the Duty to Cooperate.	No change.
Make Lee Green	2	HO 03	The Plan should set mandatory targets for social and affordable housing (as well as identify the current baseline levels).	Noted. The Local Plan does not set mandatory targets for affordable housing. This is in order to comply with the National Planning Policy Framework, which makes clear that a lower level of affordable housing than required by the Local Plan may be permissible where this can be suitably demonstrated through a viability assessment. However, the Local Plan seeks that new developments make provision for the maximum amount of genuinely affordable housing, with a strategic target of 50% of all new	No change.

				homes delivered to be genuinely affordable. This policy has been informed by the Council's Viability evidence.	
NHS (HUDU)	2	HO 03	**H03 Genuinely Affordable Housing** We support the emphasis on affordable housing being genuinely affordable. Good quality affordable housing is important to good physical and mental health.	Support noted.	No change.
South East London Labour for a Green New Deal	2	HO 03	The need for genuinely affordable housing is set out in the plan. We believe it is incompatible with the continuing right to buy legislation and this legislation must be changed in areas of housing shortage. ¼ of Lewisham residents are in the private rented sector where rents increased more than 50% between 2011 and 2017. We support greater restrictions on buy to let, increased rent controls, stronger tenant rights and housing standards and enforcement in the private sector because developing new social and affordable housing will not meet all Lewisham's housing needs. Housing development must also address the needs of key workers who may be working unsocial shifts and cannot currently afford to live locally.	Noted. Right to Buy legislation is outside the scope of the Local Plan. The draft Local Plan acknowledges the issues of housing affordability in the Borough, including in the private rented sector. The Part 2 Housing section sets out a range of policy proposals to help address the needs of different groups and to secure significantly more genuinely affordable housing, with affordability linked to local income levels.	No change.
The Hatcham Society	2	HO 03	Social Housing We welcome Lewisham's target of 50% "genuinely affordable homes" for new developments. Although we note that the Plan also says that, "the threshold level of affordable housing on gross residential development, which is not on public sector land, is set at: a. A minimum of 35 per cent". This will mean that the majority of new developments in the borough will only need to provide 35% "genuinely affordable homes" in new developments. There is no justification for this lower target in the Plan and we believe that the borough should aspire to a 50% target of "genuinely affordable homes" for all sites not just council-owned. If existing residents are to be burdened with the intensification of their neighbourhood, it must be in the name of social good and not just for developers to profit.	Noted. The strategic target for genuinely affordable housing is set at 50%, informed by findings of the Lewisham Strategic Housing Market Assessment. The 35% threshold is established by the London Plan and its viability tested route for affordable housing delivery. The Local Plan must be in general conformity with the London Plan.	No change.
Vision Develop (Q Square obo)	2	HO 03	Part (g) of this Policy states that "…Where the Viability Tested Route is used and a viability assessment is submitted to support the level of affordable housing provision made by a proposal, this must be based on a standard residual valuation approach, with the benchmark existing use value of the land taken as the existing/alternative use value, in line with National Planning Practice Guidance…". The wording of this policy is not clear as it appears to suggest that only Existing Use Value can be utilized. If this is the case, we do not consider that this approach reflects that outlined within the 'Viability and Plan Making' Government Guidance. This states that: "…To define land value for any viability assessment, a benchmark land value should be established on the basis of the existing use value (EUV) of the land, plus a premium for the landowner…"	Noted.	Local Plan policy HO3 part g amended to clarify that the benchmark land value should be established using the Existing Use Value (plus a premium for the landowner) in accordance with higher level policy guidance.

			The same document also supports the use of Alternative Use Values in some circumstances. In addition, the Mayor of London's Affordable Housing and Viability SPG (2017) also references the use of an Existing Use Value (EUV) Premium and the potential for Alternative Use Value. The wording of part (g) of Policy H03 was unclear as it appears to suggest that EUV only should be used, with no premium allowed, and that Alternative Use Value could also not be used. The wording of this part of the policy should therefore be updated / clarified to align with Government Guidance and the Mayor of London's Affordable Housing and Viability SPG.		
Deptford Society	2	HO 04	**Page 209** HO4: Requiring developers to take a long term involvement in larger developments will make a huge positive difference to quality and use mix, and to ongoing place curation and landscape and public realm stewardship.	Noted. The draft Local Plan recognises that appropriate maintenance arrangements should be put in place and that planning contributions and/or legal agreements can be used to secure the appropriate management of the public realm.	No change.
London Wildlife Trust	2	HO 04	We recognise the need for and acknowledge the aims of this policy. However, we would like to see explicit reference to the likely environmental impacts of estate infill, which often lead to a loss of quantum of open space (with some at best minor quality improvements). Estate renewal and regeneration programmes should fully comply with high environmental standards and Local Plan policies, and ideally aim for biodiversity net gains if they are likely compromise the design and delivery of a nature recovery network.	Noted. Draft Local Plan policy HO4.d provides that estate regeneration and renewal schemes must make demonstrable improvements in the environment of the local area. Where biodiversity and nature sites are concerned, development proposals will need to comply with other relevant local plan policies. The local plan must be read as a whole. However, it is acknowledged that further detail could be provided on non-designated open spaces, including those that are often located on estates.	Local Plan open space policy amended to address non-designated open spaces and the level of protection afforded to them.
	2	HO 05	All residential units should have private amenity space in the guise of a balcony, terrace or garden or an openable winter garden and minimum sizes should be specified. Adding where possible to policies is a cop out.	The Local Plan specifies that new housing development must meet, and where possible exceed, the minimum standards for private outdoor space in the London Plan.	No change.
	2	HO 05	All residential units should be built to Passivhaus Design, going beyond BREEAM excellent. You should also consider using a policy requiring the use the London Energy transformation Initiative which looks at the embodied carbon, the operational energy of the project and the active measures to reduce energy consumption which are then monitored and measured over time. At least one London Borough (Haringey) is looking to add such a policy to its Local Plan.	The Local Plan has to be in broad conformity to the London Plan which sets out specific requirements for sustainable design. Local Plan Policy SD2 reflects those requirements. The Council is currently preparing a climate change action plan which looks into the interventions required to carbon net zero by 2030 including how new residential development and existing buildings contribute to this. Given the timing of this this is likely to be included in the next Local Plan review	No change.
	2	HO 05	We support the principle of negotiating as high a proportion of social rented homes on each housing site as possible and that these should be of a design which is tenure blind with all units being equally able to access all the related play areas and communal open space, you should also outlaw segregated cores, lift access.	Supported noted. The draft Local Plan is clear that affordable housing should be designed and built in a way that is indistinguishable from market housing. The Local Plan seeks to ensure all residents within mixed tenure schemes have shared access to amenities, communal spaces, including play spaces. It is acknowledged however that further details could be provided on this.	Local Plan amended to require that developments maximise tenure integration and be designed to be tenure blind,

					in accordance with the National Design Guide.
	2	HO 05	P214 HO5 7.55 New Housing developments should include overhanging balconies or colonnades at street level to allow refuges for people in extreme weather events likely in developing Climate Change manifestations	There are particular complications in allowing balconies to overhang public highways and as such it is generally not common practice. Tree canopy may be a more appropriate form of refuge.	No change
Blackheath Society no 2	2	HO 05	**HO5 High quality housing design**. Are there sufficient protections available to ensure adequate daylight/sunlight for all? Should the Council not be clearer about whether it expects minimum BRE standards to be met for all affected by new developments (within a development and nearby neighbours) and if not what it considers an acceptable level of loss of such amenity for anyone who suffers detriment to below such minimum standards? Guidelines are weak protection.	Agreed	Local Plan policy on housing design amended to refer standards in BRE good practice guidance for daylight.
Culverley Green Residents Association	2	HO 05	All residential units should have private amenity space in the guise of a balcony, terrace or garden or an openable winter garden and minimum sizes should be specified. Adding where possible to policies is a cop out.	Noted. The draft Local Plan specifies that new housing development must meet, and where possible exceed, the minimum standards for private outdoor space in the London Plan.	No change.
London Wildlife Trust	2	HO 05	We support this policy, but would like to see explicit reference in the supporting text for communal open space to be designed to standards that also reference climate resilience and adaptation.	Noted. The draft Local Plan Part 2 policies on Green Infrastructure and Sustainable Design and Infrastructure include requirements around landscape design, climate resilience and adaptation. It is not considered necessary to duplicate these policies as the Local Plan must be read as a whole.	No change.
Vision Develop (Q Square obo)	2	HO 05	Part (g) of this Policy states that: "…Housing development should maximise the provision of dual aspect dwellings. Proposals for single aspect dwellings will be resisted and should only be considered in exceptional circumstances, where it can be suitably demonstrated that it will provide for a more appropriate design solution than a dual aspect dwelling, having particular regard to: a. Building layout and orientation; b. Outlook for occupiers; c. Microclimate management including for heating, cooling and ventilation; and d. Amenity including adequate privacy and protection against exposure to odour, noise, light and air pollution…" We support the aspiration to minimise single aspect units within development proposals to ensure good residential quality. However, due to the orientation of some sites, particularly those which are smaller sites, the potential for avoiding single aspect units altogether can be unavoidable, particularly when seeking to ensure that the development potential of the Site is met. We therefore suggest that wording is included within the draft Policy to acknowledge this potential constraint, so that the policy does not have the effect of resulting in underdeveloped or undevelopable housing sites.	Noted.	Local Plan amended to include additional criterion on 'site size and orientation' when considering appropriateness of single aspect dwellings.

Home Builders Federation	2	HO 06	**HO6 Accommodation for older people** We generally welcome the policy. It does support the supply of new specialist older persons housing. As the London Plan identifies, although London's population is relatively young, there is a growing need for new specialist homes to cater for the needs of London's aging population. As paragraph 4.13.1 observes: *While London is a 'young city', it is expected to experience substantial growth in its older population. By 2029 the number of older person households (aged 65 and over) will have increased by 37 per cent, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42 per cent.* ***Appropriate accommodation is needed to meet the needs of older Londoners****.* (Emphasis in the London Plan). We would welcome an amendment to the policy to strengthen this by referring to the indicative benchmark supply targets in Table 4.3 of the London Plan. This sets an objective for 100 units of specialist older persons housing to be provided in Lewisham each year. We recognise that this is not a binding target, but a benchmark to aim for. Furthermore, as the London Plan clarifies in paragraph 4.13.4, the policy contains requirements for 'specialist older person housing'. It does not apply to accommodation which is considered 'care home accommodation'.	Noted.	Local Plan policy supporting text amended to refer indicative benchmark targets for specialist older person's accommodation in the London Plan, as suggested.
London Borough of Bromley	2	HO 06 Paragraph 7.65	Policy HO6 concerns accommodation for older people. While the principle of the policy is supported, there are elements which could be viewed as onerous, particularly the requirement to demonstrate that specialist older persons accommodation is sufficiently supported by community infrastructure and the requirements to avoid a harmful overconcentration of care home accommodation. older persons. There is a concern that these elements may preclude delivery of older persons accommodation and increase pressure on neighbouring Boroughs. This is also the case with paragraph 7.65, which seems to link suitability of accommodation to the level of affordability and financial support.	Noted.	Local Plan amended to provide more flexibility for the appropriate location of older person's accommodation . Paragraph 7.65 deleted to ensure clarity on policy implementation.
Telegraph Hill Society	2	HO 08	In refusing an application for purpose-built student accommodation (PBSA), consideration needs to be given as to where students might alternatively live. We have experience locally, prior to the increase of PBSA by Goldsmiths, of developers converting houses into flats specifically for student accommodation purposes where they could obtain higher income levels, thereby reducing properties available for long-	Noted. Whilst recognising the need for PBSA, it is important that a balance is struck in planning for the needs of other groups and types of housing. The London Plan sets an overall strategic requirement for 3,500 PBSA bed spaces annually for London. If divided equally this would amount to some 106 bed spaces per Borough. Over the past 5 years, Lewisham has delivered an average of 337 bed spaces PBSA	No change.

			term residents of the Borough. This effectively stopped with the introduction of the current policy barring flat conversions and the development of cheaper more suitable student accommodation blocks in the area. Care needs to be taken, however, to ensure that, if HO2 on flat conversions is relaxed despite our objections and sufficient PBSA is not available, this damaging trend does not recur. **7.78** discusses the reverse case where the development of PBSA would compromise the delivery of local housing, but not the situation described above where the lack of PBSA compromises the retention of existing local housing. **HO8** and the explanatory paragraphs need to document how this situation will be avoided.	annually. Given this situation, the Council considers that a carefully managed approach to this type of housing is appropriate. Further details are set out in the Lewisham Strategic Housing Market Assessment.	
	2	HO 09	I'm responding to the draft Local plan with some thoughts with regard to Lee Green /Hither Green area. HMOs and article 4 I'm concerned in the increase in HMOs applications for this area. The latest that has come to my attention is 82 Manor Park -a four bed family home that has been converted without permission to a HMO and is now going through retrospective planning application. The areas these applications are being made in are ones which surround schools and a lot of young families. HMOs are not in keeping with the character or need of the area. The area desperately needs family housing and what's more the landlords seem to have no regard for planning laws frequently using retrospective applications. Lee Green consists of predominantly Victorian housing and the character of the area is under threat from unscrupulous landlords. The local plan must include Article 4 to negate HMO developments in this area. You've managed this in Downham why not here where schools and families sit side by side?	Noted. The making of Article 4 Directions and retrospective planning applications are outside the scope of the Local Plan. The draft Local Plan only supports large HMOs where they do not result in the loss of existing larger housing suitable for family occupation and do not give rise to adverse impacts on the amenity of the surrounding neighbourhood. An Article 4 Direction to control small scale HMOs already exists in the four southernmost wards. The Council Has reviewed its evidence base and recommending to Mayor and Cabinet the making of an Article 4 Direction covering the remainder of the borough.	No change.
Blackheath Society no 2	2	HO 09	**HO9 Housing with shared facilities (Houses in Multiple Occupation)**. Unclear why Article 4 Directions regarding HMOs only apply in the south of the Borough.	Noted. The HMO Review and Evidence Base Paper (2018) sets out the reasons for introducing an Article 4 Direction in the south area. This is available on the Council's local plan Evidence Base webpage. The council has reviewed its evidence base and recommending to Mayor and Cabinet the making of an Article 4 Direction covering the remainder of the borough. The making of Article 4 Directions is outside the scope of the Local Plan.	No change.
Hither Green West Campaign Group	2	HO 09	We welcome restrictions and development proposals for new houses with shared facilities (e.g. HMOs) that ensure they do not result in the loss of existing larger housing suitable for family occupation. Consideration should be given to the	Support noted. Draft Local Plan policy HO9.C addresses the change of use of HMOs, including into conventional residential housing. In general, the Local Plan seeks to protect existing HMOs recognising these make a	No change.

			feasibility of returning houses that have previously been converted into HMOs, back into family homes.	contribution to meeting local housing needs of particular groups.	
London Borough of Tower Hamlets	2	HO 09 HO 08	As we discussed in the presentation, it may be beneficial to solidify new Houses in Multiple Occupation (HMO) standards and expectations in the new Local Plan. This will ensure that you have a policy base to guide the construction/conversion of new HMOs and ensure higher standards of living in HMOs. This should also prioritise the protection of family homes in areas that they are threatened by conversion. With regard to larger HMOs or co-living spaces the wording around the difference between need and demand should be extrapolated upon in the policy. A similar approach should be taken to new purpose built student accommodation (PBSA), as discussed in our meeting. Many London boroughs have seen a recent influx of PBSA applications. More policy guidance around their location and higher education partnerships should be provided, as well as design guides and space standards to ensure that the buildings have a longer lifespan and provide a high quality of living for occupants. The current wording in the Issues and Approaches document could be strengthened.	Noted. The draft Local Plan only supports large HMOs where they do not result in the loss of existing larger housing suitable for family occupation. In the case of small HMOs, a more flexible approach is taken recognising this type of accommodation helps to meet the needs of specific groups. Where there are issues with the harmful overconcentration of HMOs the Council has implemented Article 4 Directions and will continue to review the need to extend this. Noted. Whilst recognising the need for PBSA, it is important that a balance is struck in planning for the needs of other groups and types of housing. The London Plan sets an overall strategic requirement for 3,500 PBSA bed spaces annually for London. If divided equally this would amount to some 106 bed spaces per Borough. Over the past 5 years, Lewisham has delivered an average of 337 bed spaces PBSA annually. Given this situation, the Council considers that a carefully managed approach to this type of housing is appropriate. Further details are set out in the Lewisham Strategic Housing Market Assessment.	Local Plan policy on large scale purpose built HMOs, point D.a, amended to refer to 'local market demand' instead of local need.
Telegraph Hill Society	2	HO 09	We refer to our comments on policy **HO2.E** in paragraphs 157-158. It is unclear as to whether interaction of this policy with **HO2.E** prevents (as we believe it should) the ultimate subdivision of properties into unacceptable units, such as flats without family accommodation.	Draft Local Plan policy HO2 on housing conversions includes a cross reference to HO9 on HMOs. The policies are intended to work together to ensure that all proposals for housing conversions result in high quality accommodation for occupants.	No change.
Deptford Society	2	HO 10	**Page 235** HO10: Self-build is played down too much in the document; dismissed as a result of a survey that did not get much response. Lewisham should be actively promoting self-build and providing assistance and knowledge transfer; the council should also be actively promoting the register of self-build sites that they are legally obliged to maintain.	Noted. The draft Local Plan has a standalone policy on self-build or custom-build housing. It promotes this type of development and provides in principle support for such development proposals that help to meet identified needs and secure delivery of the spatial strategy. However a balance must be struck, as the Lewisham Strategic Housing Market Assessment indicates that need for self-build and custom-build is relatively limited, for instance, when compared to genuinely affordable and conventional housing. The Council maintains a self-build and custom-build homes register and has a dedicated webpage where people can register their interest. The Council has and will continue to support local communities with self-build projects within resources available to it.	No change.
	2	HO 11 LSA SA 15	The background is as follows: The Lewisham Gypsy and Traveller Accommodation Assessment (2015 and amended 2016) identifies a minimum need for six pitches within the plan period, arising from people currently living in bricks and mortar homes, teenage children and household formation. Having	Noted. It is considered that the identified quantum of pitches for gypsy and traveller accommodation can feasibly be delivered at the Pool Court site. It is acknowledged that there are site development constraints, including the SINC, but that these can be addressed at the design and planning	Pool Court site allocation amended to include additional

			regard to this assessment, the Council commenced preparation of a Gypsy and Traveller Site Local Plan. This set out the approach to meeting identified local need for this group, including through site allocation policies. A Preferred Site Consultation was then over six weeks in 2018. Consultation responses have been considered and negotiations with landowners are progressing. This is particularly to ensure that any future proposed site is deliverable for the intended use, and that feedback from the wider public is appropriately addressed. 9.7.6 In light of the above, the Draft Local Plan proposes an allocation at Pool Court, which is a 0.3 ha site located to just to the southwest of the Catford Masterplan area; specifically, to the south of the large proposed allocation at Wickes and Halfords, Catford Road. The site comprises a 'left over' triangle of land at the point where the two railways south of Catford cross-over one another. The River Ravensbourne borders the site, and the confluence of the rivers Ravensbourne and Pool is near adjacent to the west of the site (separated by the railway); however, the site is shown intersect flood zone 2 (as opposed to flood zone 3, which constrains Wickes and Halfords, Catford Road), presumably because the river is effectively channelled or culverted at this point. A related constraint is the on-site local nature conservation (SINC) designation, and it is important to consider the biodiversity value of this site not only isolation, but as one element of the ecological network associated with the Ravensbourne and Pool river valleys (see discussion of the Wickes and Halfords site above, under 'Biodiversity'). Whilst it is recognised that this site has been identified following a site selection process undertaken over a number of years, given the onsite constraints, it is recommended that further detailed assessments of biodiversity and flood risk are undertaken, with additional requirements/guidance included within the site allocation, as appropriate; the council should also continue to explore other opportunities to meet the housing needs of this group." https://councilmeetings.lewisham.gov.uk/documents/s76177/Annex%203b%20Lewisham%20Local%20Plan%20IIA%20-%20Interim%20IIA%20Report.pdf I support the need for further detailed consideration of the negative impact to biodiversity and the SINC. Not only this, I believe that this site is insufficient to meet the needs of the Traveller community and that as a standalone policy is insufficient to comply with the London Plan.	application stage, and through the Development Management process.	development requirements for biodiversity and flood risk management.

London Borough of Bromley	2	HO 11	Bromley welcomes Lewisham's commitment to protect existing Gypsy and Traveller provision in the Borough to meet existing and identified future need, as set out in policy HO11.	Support noted.	No change.
London Borough of Southwark	2	HO 11	It is supported that Lewisham Council can assess the housing need for Gypsies and Travellers arising within their administrative boundaries, as part of the local plan process, and to make provision of sites to address this need independently.	Support noted.	No change.
Greater London Authority	2 3	HO 14 LSA SA 15	**Gypsy and Traveller accommodation** The council's Accommodation Assessment (2015 and 2016 update) identified need for at least six pitches, which is being met through a Site Allocation at Pool Court. However, the draft Plan policy does not explicitly include a ten-year pitch target as required by London Plan Policy H14(A). The Site Allocation should also more explicitly address concerns related to biodiversity and flood risk, as set out in our response to Lewisham's Gypsy and Traveller Site Local Plan Regulation 18 Stage 3 consultation (Nov 2018). It should be noted that, following Direction from the Secretary of State, the Gypsy and Traveller definition has been deleted from London Plan Policy H14. The definition within national policy should be applied. The Mayor intends to undertake a London-wide Gypsy and Traveller Needs Assessment (para 4.14.2 of the London Plan) and there is funding available for pitch provision through the Mayor's Affordable Homes Programme (para 4.14.5).	Lewisham's GTAA (2016 update) identified the need for 6 pitches up to 2031. The Local Plan provides that this need can accommodated in full, by way of a site allocation policy (Land at Pool Court). The glossary in Appendix 2 replicates the definition set out in national policy.	Local Plan updated to include a policy with 10-year pitch target for gypsy and traveller accommodation, based on the Council's latest needs assessment, in line with the London Plan. Local Plan updated with an informative noting that the Mayor intends to undertake a London-wide needs assessment in due course. Pool Court site allocation amended to provide guidelines around flood risk and biodiversity
	3	LEA SA 05	The River Quaggy by the BMW site and along to the back of Weigal Road playing Fields is opened up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee.	Noted. The Local Plan broadly supports river restoration and enhancement. The site allocation for the BMW site includes requirements for new development to better reveal and enhance the River Quaggy, including public access to it.	No change.

	2	QD	2. High Quality Design: I'd like to see strong and enforceable agreements with chose developers in place. This is to avoid situations like the failure to provide the pedestrian bridge over the greyhound stadium development and the last-minute battle to stop the 20+ storey building next to Catford station. I applaud the ambition of having 50% social housing, but I'd like to see the same ambition in the quality of housing being approved to build: can we aim higher than the bare minimum standards set by London? Can we look at blending in with the architectural character of the area? I'd also like to see greater focus on re-purposing/repairing existing buildings whenever possible, as opposed to the assumption that new homes can only come out of new builds.	Noted. At its meeting on 16th September 2020 Mayor & Cabinet agreed the transfer of S106 funding originally proposed for the delivery of a footbridge between Doggett Road and the Barratt's development on the former Catford Greyhound Stadium site to be used to deliver a programme of public realm and accessibility improvements to Catford Station areas. See M&C report for further details. The draft Local Plan proposes a 50% strategic target for affordable housing, which is in general conformity with the London Plan. A higher target could be set, however it would need to be demonstrated to be viable. The Council has prepared a Viability Assessment of the draft Local Plan, and the 50% target is considered to be appropriate in light of this evidence. The Regulation 18 Local Plan document includes policies on sustainable retrofitting of existing building stock. However it is accepted that the plan can provide more emphasis and support for this.	Local Plan amended with additional policy to emphasise the importance of sustainable retrofitting of existing building stock.
	2	QD	Unfortunately I was not aware that there is a consultation process about the local plan. On the website I only found a 26 page pdf- document, which I couldn't mark up electronically. I therefore just write a couple of points which I hope will be taken into account. - Building density: I think it is good to build housing on top of retail, but it is absolutely crucial that public services are expanded at the same time (not afterwards). In particular, my neighbouring ward in Lee Green is planned to receive more housing, and it is not clear that its community infrastructure will be increased and improved at the same time. Please avoid cramming too many tiny 1 and 2 bedroom flats without storage space into new developments. - Building material: Please avoid wooden external materials which are never ever maintained and look awful after only a few years. - Building height: Please limit the height of new buildings to not exceed 15% of their surroundings. Lewisham town centre near the station looks horrendous, and the planned new towers on the site of the Tesco car park and the former Carpet Right site will only make matters worse. Leave the overzealous towers at this place, and protect the more humane dimensions in the borough otherwise.	Noted. The public consultation was carried out in accordance with the Council's adopted Statement of Community Involvement. An Infrastructure Delivery Plan has been prepared alongside the Local Plan. This sets out infrastructure required to support the growth planned in the borough. Part 4 of the draft Local Plan sets out how new development must contribute to securing the delivery of infrastructure. The draft Local Plan requires that building materials are of a high quality but provides flexibility for the use of materials. The London Plan directs the Local Plan to identify locations appropriate for tall buildings and set parameters for building heights. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has been undertaken, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
	2	QD	DECENT HOMES STANDARD: you do not mention which one you are referring to. Are you referring to the PARKER MORRIS standards? Also, please reference Jane Jacobs 'The Death and Life of Great American Cities' for a comprehensive study on what makes a city work.	Noted. The Decent Homes Standard is guidance prepared by the Government's Ministry of Housing, Communities and Local Government.	No change.

			HOMES: The local plan does not examine what constitutes a HOME, as opposed to short term sleeping quarters? What are the basic needs and requirements for a family to be able to live in and be able to call it home? Adequate proportions are vital and the planning department should not pass at planning level, any developments that do not respect the Parker Morris measurements. This would help keep more families in the borough. HIGH RISE: Appearance and wind tunnels: With reference to Lewisham, as a physical presence, these skyscrapers are not pleasant, they are not set back from the pavement, there is no front garden, no air, no space and all they do is create wind tunnels that are so strong that I have seen elderly people hanging onto the bus pole to avoid being be knocked over on a windy day. Cities that have excelled in creating attractive tall buildings, like New York, USA, for instance, have also created wide avenues six to eight lane wide. So, these open areas considerably abate the wind tunnel effect. Here, with narrow roads, and the buildings not being set back at all, not even by 1 metre, lined up right 'in your face', there is no respite. The resulting wind tunnels are extremely unpleasant and I expect people would have to be very desperate to want to live near there. Surely the idea of a 'local plan vision' is to create areas that are attractive and desirable, where people want to go, rather than places they will do all they can, to avoid.	The draft Local Plan Part 2 Housing policies include standards for housing design, which are considered to be in line with the London Plan. The draft Local Part 2 High Quality Design policies set out design requirements for tall buildings, which take forward the London Plan policies and include considerations for microclimate.	
	2	QD	Given the current initiative to allow extra floors to be added to houses, rows of shops and blocks of flats to produce extra flats without needing planning permission I would have expected at least some recognition of this and how the council will attempt to ameliorate these impacts e.g. on neighbours, traffic, environment, etc. (just think about all those extra wheelie bins on the pavements along shopping streets for a start). You could at least identify areas where you might try to prevent it and also produce design guides and undertake wide publicity if it starts happening. There also needs to be political action.	Noted. Permitted Development rights are outside the scope of the Local Plan. The removal of permitted development rights would need to be addressed through an Article 4 Direction, which is also outside the scope of the Local Plan.	No change.
	2	QD	You should also bear in mind the tragic Grenfell fire and its causes. Most tower blocks were built with a 60 year life, or even shorter in the case of office blocks, with poor thermal insulation and the use of a variety of cladding systems. A lot of the previous residential towers were built by local authorities in the 60's and 70's under a system where the government would only allow them to borrow to build units of this type. Many suffered from very poor insulation, water ingress, poor systems building techniques and failing cladding. Recladding them to try to tackle some of these problems and make them look 'prettier' led to Grenfell. A lot of the new residential towers appear to utilise office block building techniques with concrete cores and frames and cladding panels bolted on or the use of steel frames, both with a very high level of embedded carbon. If a high proportion of these flats are for	Noted. The draft Local Plan Part 2 High Quality Design section sets out requirements for tall buildings, in line with the London Plan. The London Plan also includes a policy on Fire Safety, which all new development proposals must have regard to. Building Regulations are outside the scope of the Local Plan.	No change.

			sale and the buyers expect to have a 99 year lease on a building which probably has a shorter shelf life or needs remedial work or re cladding after 40 or 50 years, what then? At the very least the planning system needs to ask very firm questions through policies about the life span of the building etc. Grenfell has shown how the current system of building regulations and approved inspectors is not fit for purpose and cannot be relied on.		
	2	QD	Also, should a type of building material be found to be retrospectively unsafe, who will foot the bill for that or will the property be sold with a long term NHBC warranty covering this? By long term I means 15 years plus? My partner is facing bankruptcy due to this issue so would not like to see it happen to other.	Noted. The London Plan includes a policy on Fire Safety, which all new development proposals must have regard to. The safety of building materials is covered by Building Regulations.	No change.
	2	QD	Good Quality Design: The council mentions at various points in the draft plan the fact that it wishes to promote and ensure good quality design and references its Design Review Panel as a way of assisting to this end. This and its design guides are all very helpful but are not of much use if more and more new build becomes permitted development. The London Society had a recent debate in which a number of eminent architects and designers spoke around the Build Back Better theme and how to ensure good quality design. The only person to burst their bubble was the TCPA speaker who listed the proportion of buildings being produced without the need for planning permission and how uniformly appalling it was. Given the current initiative to allow extra floors to be added to houses, rows of shops and blocks of flats to produce extra flats without needing planning permission I would have expected at least some recognition of this and how the council will attempt to ameliorate these impacts e.g. on neighbours, traffic, environment, etc. (just think about all those extra wheelie bins on the pavements along shopping streets for a start). You could at least identify areas where you might try to prevent it and also produce design guides and undertake wide publicity if it starts happening. There also needs to be political action.	Noted. Permitted Development Rights are outside the scope of the Local Plan. The removal of Permitted Development rights would need to be addressed through an Article 4 Direction, which is also outside the scope of the Local Plan.	No change.
Blackheath Society no 2	2	QD	**General** What is included • Design quality (QD) - key to everything) • Height (QD4) – policy better but needs more work) summary of main points: • Optimising site capacity (QD6) – need more control over density) see following table • Public realm/greening (QD & GR) - need more/better public spaces) for details	Noted. Comments on detailed representations set out elsewhere in this Consultation Statement.	No change.
Blackheath Society no 2	2	QD	Good that high quality design given such prominence. Follows new London Plan.	Noted.	No change.

Blackheath Society no 2	2	QD	This section should be titled High Quality Design and Placemaking. The section should be rebalanced to make clear that the space between buildings is as important as the quality of the new building. The design approach as set out should be shorter and closer to a check list of what must be included, such as site analysis and response to site, character, context and movement.	Noted. It is considered that the title appropriately reflects the contents of the section. The title of the section will not materially impact on the policies within it. Draft Local Plan policy QD1 makes clear that in responding to local character, development proposals must have regard to building lines along with the orientation of and spacing between buildings. The draft Local Plan Part 2 policies are criteria based policies, which development proposals will need to demonstrate their compliance with. The Council publishes a local requirements list (i.e. validations list) which sets out the information that must be submitted with planning applications. This is available to view on the Council's planning webpage.	No change.
Brockley Society	2	QD	**Public Toilets:** The aim to make Lewisham a greener borough, encouraging walking and sustainability raises the issue of provision of public toilets. Provision for this, whether reopening closed facilities, providing new facilities or working with businesses to provide them needs to be considered in the plan.	Noted. Provision of public toilets is addressed in the draft Local Plan Part 2 High Quality Design policy on public realm.	No change.
Culverley Green Residents Association	2	QD	**Good Quality Design** The council mentions at various points in the draft plan the fact that it wishes to promote and ensure good quality design and references its Design Review Panel as a way of assisting to this end. This and its design guides are all very helpful but are not of much use if more and more new build becomes permitted development. The London Society had a recent debate in which a number of eminent architects and designers spoke around the Build Back Better theme and how to ensure good quality design. The only person to burst their bubble was the TCPA speaker who listed the proportion of buildings being produced without the need for planning permission and how uniformly appalling it was . Given the current initiative to allow extra floors to be added to houses, rows of shops and blocks of flats to produce extra flats without needing planning permission I would have expected at least some recognition of this and how the council will attempt to ameliorate these impacts e.g. on neighbours, traffic, environment, etc. (just think about all those extra wheelie bins on the pavements along shopping streets for a start). You could at least identify areas where you might try to prevent it and also produce design guides and undertake wide publicity if it starts happening. There also needs to be political action.	Noted. Permitted Development rights are outside the scope of the Local Plan. The removal of Permitted Development rights would need to be addressed through an Article 4 Direction, which is also outside the scope of the Local Plan.	No change.
Deptford Society	2	QD	In general we welcome a focus on high-quality design, but much of this chapter is so open to interpretation that it is likely to prove difficult to enforce. More thought needs to go into	Noted. The Local Plan is required to be consistent with the National Planning Policy Framework, which provides that the Local Plan design policies are not overly prescriptive. The policies are considered to be proportionate in scope,	No change.

			how high quality design is enforced, and new methodologies explored - with local communities and stakeholders.	and will provide a robust basis for determining planning applications. The Council has and will continue to prepare a suite of planning guidance to support the implementation of the Local Plan. The preparation of future guidance documents will be subject to resources available. Planning enforcement is outside of the scope of the Local Plan.	
Deptford Society	2	QD	Page 87 In addition to considering setting density standards for new developments in the borough, the local plan should incorporate similar metrics for green space requirements – especially in the north of the borough.	Noted. The draft Local Plan Part 2 section on Green Infrastructure supports urban greening measures, and sets requirements for major developments throughout the borough to achieve a target Urban Greening Factor, in accordance with the London Plan.	No change.
Greater London Authority	2	QD	**Design** The Mayor welcomes the draft Plan's emphasis on a design-led approach to development and the use of an independent Design Review Panel (draft Plan Policy QD1(L)). The use of tools such as 3D digital modelling could also be helpful. London Plan Guidance Good Quality Homes for all Londoners - consultation draft (October 2020) and Public London Charter - consultation draft (October 2020) has been issued, which could be of use when refining the Local Plan.	Noted. The draft Local Plan mentions the use of 3D modelling such as enabled by VU City to seek individual and cumulative impacts of proposals. The preparation of the Regulation 19 version of the Local Plan has taken into account the London Plan Guidance Good Quality Homes for all Londoners - consultation draft (October 2020) and Public London Charter - consultation draft (October 2020).	No change.
Lee Forum	2	QD	1. In the design section and throughout the plan there is no mention made of building to Human Scale. Building to Human Scale is an important design principle, particularly as Lewisham is building higher in many locations, to communities and the long term success of developments. The importance of building to Human Scale and importantly, practical detail as to how the borough expects developers to achieve human scale, is mentioned in many borough's Local Plans and we would like to see the same in Lewisham's Local Plan.	Noted. The draft Local Plan Part 2 section on High Quality Design seeks to ensure all new development puts people at the centre of the design-led approach, ensuring buildings and spaces are welcoming, inclusive, safe and accessible to all and that proposals should demonstrate an understanding of how people engage with and experience their surroundings, and respond positively to this by delivering healthy, liveable and walkable neighbourhoods. However, it is acknowledged that an additional criterion on human scale can help to support this approach.	Local Plan amended to include an additional policy criterion on designing development to a human scale.
Lee Forum	2	QD	3. In the design section there are aspirations but no detailed guidance on what constitutes good design. The emerging Leegate plans illustrate that good intentions are too easily manipulated by developers and what is needed is detailed instruction to developers. Lewisham has an Alterations and Extensions SPD but very limited guidance on what constitutes good design for large, new buildings. Yet larger new buildings leave a great impact on the ongoing heritage of an area. We would like to see Lewisham get ahead of developers on this. We would like to see more detailed instruction to developers on what the ongoing development of Lewisham's heritage should look like and how Lewisham wants to see this achieved. A good example of what we would like to see is Hounslow's Great Western Corridor Masterplan and Capacity Study	Noted. The Local Plan is required to be consistent with the National Planning Policy Framework, which provides that the Local Plan design policies are not overly prescriptive. The policies are considered to be proportionate in scope, and will provide a robust basis for determining planning applications. The draft Local Plan sets out development parameters and design guidelines for site allocation policies, which are included in Part 3 of the plan. There are site allocations for several large sites in Leegate centre. The Council has and will continue to prepare planning guidance to support the implementation of the Local Plan. The preparation of future guidance documents will be subject to resources available.	No change.

Lee Forum	2	QD	Leegate is a test case for the Local Plan and after 4 years of consultation with planners the developer has come up with plans that do not comply with almost all the design criteria of policy QD1D. This suggests that the guidance needs to be more specific. We would like to see a proper design guide for large new builds, much as one exists already for alternations and extensions with illustrated examples of what is considered appropriate in particular settings and specific instructions regarding design principles, e.g. human scale, setbacks, articulation, heights and materials. See the level of detail Hounslow have used in their Great Western Corridor masterplan and capacity study for an excellent example of what we would like to see. The design guidance should encourage design for specific places to guide developers clearly. Whilst the Lee Neighbourhood Plan includes illustrations and descriptions of appropriate design, the interaction of the Leegate plans with the Local Plan has made us rethink the level of written detail needed also in the Lee Neighbourhood Plan	Noted. Planning applications will be considered against the extant policies in the adopted Development Plan. Emerging plans may be afforded some material weight in planning decisions depending on the stage they are at in the plan-making process, but do not carry full weight until adoption. The Local Plan is required to be consistent with the National Planning Policy Framework, which provides that the Local Plan design policies are not overly prescriptive. The policies are considered to be proportionate in scope, and will provide a robust basis for determining planning applications. The draft Local Plan sets out development parameters and design guidelines for site allocation policies, which are included in Part 3 of the plan. There are site allocations for several large sites in Leegate centre. The Council has and will continue to prepare planning guidance to support the implementation of the Local Plan. The preparation of future guidance documents will be subject to resources available.	No change.
Lee Forum	2	QD	Other council's, e.g. Bexley's 'Design for Living' residential design guide, include design guidance that building must be to Human Scale. Lewisham draft Local Plan makes no mention of building to Human Scale. We would like to see Lewisham include wording similar to that used by Bexley, e.g. **''The visual scale and massing of development can be reduced through the use of a variety of materials and features on building facades, a change in storey height and the articulation of corners that have a relationship with the street and a 'human scale', ''developments which steer away from one consistent height, with staggered building heights** (away from public realm) **can make taller blocks less 'overbearing' in the streetscape''.** The experience of comfort and wellbeing in cities is closely tied to how city structure and city space harmonize with the human body, human senses, and corresponding space dimensions and scale. An instinctive reason people ask for wide pavements on Eltham Road and Burnt Ash Road during Leegate Consultations is because taller buildings need correspondingly wider streetscape. The further away you are from a tall building, the less it impacts on human scale. There is an urban design principle that buildings should be roughly as tall as the street is wide. Human Scale ratios of height to width should be spelled out, and where mitigating measures such as setbacks at the base of buildings to increase public realm, or at the top of buildings to reduce the impression of height are allowed, the limits to which they will be allowed should also be spelled out.	Noted. The draft Local Plan Part 2 section on High Quality Design seeks to ensure all new development puts people at the centre of the design-led approach, ensuring buildings and spaces are welcoming, inclusive, safe and accessible to all and that proposals should demonstrate an understanding of how people engage with and experience their surroundings, and respond positively to this by delivering healthy, liveable and walkable neighbourhoods. However, it is acknowledged that an additional criterion on human scale can help to support this approach.	Local Plan amended to include an additional policy criterion on designing development to a human scale.
Lee Forum	2	QD	All developments that include housing should provide safe enclosed play areas for children. It is also important that	Noted. The draft Local Plan proposes to apply the London Plan standards for housing, including amenity and children's play space.	No change.

			lighting and throughways do not expose pedestrians to hidden spaces and potential dangers.	The draft Local Plan Part 2 policy QD02 sets out principles and requirements for inclusive and safe design.	
Lee Manor Society	2	QD	We note the frequency with which planners refer in the plan (and in the webinars) to the importance of high-quality **design** in influencing planning decisions. Good design is desirable, but it should not be used as an excuse for allowing inappropriate developments to slip through the net. A scheme may be well designed in its own terms but fail to reflect the character of the local area or be inappropriate in terms of its height, scale, mass or bulk.	Noted. The draft Local Plan is clear that high quality design requires development proposals to respond positively to the site context, including local character.	No change.
South East London Labour for a Green New Deal	2	QD	Diversity and experience shape how we use and experience buildings differently. We support the need for genuine accessibility for all and greater protection for it in housing and public spaces.	Noted.	No change.
Telegraph Hill Society	2	QD	We do not believe the draft Plan can achieve **Strategic Objectives B3 and B4 or G16-19** with a "*design-led*" approach to development which apparently concentrates on high rise buildings, necessarily of modernistic design, to meet population growth targets which, although set by the Mayor of London, may or may not be set.	Noted. The design-led approach applies to all types of development irrespective of nature or scale. The Local Plan is required to set a positive framework for delivering sustainable development, consistent with the National Planning Policy Framework, and meeting identified needs such as for housing, economic activities and community facilities.	No change.
Telegraph Hill Society No 2	2	QD	*Officer note: representation includes submission of 'The Consequences of Living in High-Rise Buildings' Paper to support their comments*	The London Plan directs the Local Plan to identify locations appropriate for tall buildings and set parameters for building heights. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has been undertaken, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
	2	QD 01	**QD1 Delivering high quality design in Lewisham** I support the principles of QD1, but question how it will be delivered. As suggested in the draft Plan, SPDs and other guidance documents are required to ensure design quality is delivered, and such guidance documents are required urgently at Lee Green. Developers should be required (not just expected as currently worded) to bring proposals to the Design Review Panel for all schemes over a certain size or in sensitive locations. Large developers usually use one architect for their initial design development, changing architects once planning consent is secured. Developers then often seek to 'water down' design at the implementation stage to reduce their costs. To avoid this Lewisham should consider controlling design through conditions requiring developers to seek approval for key design features, and to provide developers with examples of good development practice such as RIBA guidance. The Local Plan could be clearer on the Council's expectation that they will control and manage the delivery of high quality design in this way.	Noted. The Council encourages applicants of major development schemes to bring these forward to the Design Review Panel, however it cannot require that development proposals are taken to the DRP. The Council has and will continue to use planning conditions attached the planning consents, the nature of which will be considered on a case-by-case basis. The Council has planning enforcement powers that can be used to ensure that development is authorised and not in breach of planning consent. The Council has and will continue to prepare planning guidance to support the implementation of the Local Plan. The preparation of future guidance documents will be subject to resources available. An Infrastructure Delivery Plan has been prepared alongside the Local Plan. This sets out infrastructure required to	No change.

			QD1I - the provision of infrastructure The potential for 600+ new residential units and the commensurate increase in local population will put considerable pressure on local amenities and infrastructure. Developers should be required to contribute appropriate CIL payments for tangible local benefits including primary care (the improvement and enlargement of Handen Road Health Centre will be necessary), local child care, youth services and facilities and support for elderly, all should be considered. In addition improvements to the Burnt Ash Road, Lee High Road junction are required to improve traffic and pedestrian safety as well as greening the area. As the only local Park, improvements to Manor House Garden should also be required. Developers should be pressed to include appropriate physical facilities within their own proposals, and not to displace these off site by means of contributions.	support the growth planned in the borough. Part 4 of the draft Local Plan sets out how new development must contribute to securing the delivery of infrastructure where appropriate by CIL and Planning Obligations.	
	2	QD 01	**Design (policy QD1)** Following on from the comments above, Policy QD1 should reflect London Plan policy and state that neighbourhood character can and should evolve over time in response to changing demands while ensuring that new development is of a high quality and meets high standards of sustainability.	Noted. Draft Local Plan policy QD1 addresses this point, as it provides that in responding to local character development proposals must take into account the prevailing or emerging form of development (including urban grain, building typology, morphology and the hierarchy of streets, routes and other spaces). However, additional clarification will be provided in the supporting text.	Local Plan Policy QD1 supporting text amended to signpost that neighbourhood character can evolve over time.
	2	QD 01	The council mentions at various points in the draft plan the fact that it wishes to promote and ensure good quality design and references its Design Review Panel as a way of assisting to this end. This and its design guides are all very helpful but are not of much use if more and more new build becomes permitted development. The London Society had a recent debate in which a number of eminent architects and designers spoke around the Build Back Better theme and how to ensure good quality design. The only person to burst their bubble was the TCPA speaker who listed the proportion of buildings being produced without the need for planning permission and how uniformly appalling it was.	Noted. Permitted Development rights are outside the scope of the Local Plan. The removal of Permitted Development rights would need to be addressed through an Article 4 Direction, which is also outside the scope of the Local Plan.	No change.
	2	QD 01	1) Section QD 1 re design. It is mentioned, but, given the Climate Emergency, I would expect to see somewhere a much stronger requirement for the very best energy efficiency technology to be mandatory in new builds. Where can we find this in the Plan?	The draft Local Plan Part 2 section on Sustainable Design and Infrastructure includes policies which address climate change adaptation and mitigation. The Local Plan must be read as a whole for planning decisions.	No change.
	2	QD 01	It is a mistake for developments to be 'design led'. They should instead be community led, if you are not to avoid developments being un-liked and contentious and causing animosity towards the Council and even making current residents leave the borough. I.e. Their design, use, purpose, facilities must ADD to the experience/ enhance the appearance of the communities nearby.	Disagree. The design-led approach is set out in the London Plan, which the Local Plan must be in general conformity with. However it is agreed that local communities should be engaged in the design-led approach and development process. Therefore, the draft Local Plan policy QD1 states that applicants should work closely with local communities and others likely to be affected by new development to understand the local and distinctive context of the site, as well as to consider design options that respond positively to this context.	No action.

Blackheath Society no 2	2	QD 01	**QD1 Delivering high quality design in Lewisham**. **QD2 Inclusive & safe design**. Good general principles in **QD1** and **QD2**, especially emphasising people and place, but no mention of local needs and wishes. Welcome emphasis on early, proactive, inclusive and effective engagement (**QD 1** M). All too often it is NOT effective. Comments and criticisms are downplayed or ignored. Where are ideas to improve and measures to evaluate effectiveness of engagement in future e.g. leading to changes in plans?	Support noted. The Council's adopted Statement of Community Involvement sets out the procedures for consulting the public on planning decisions, including planning applications. The SCI is subject to periodic review and updating. Separately, the Council has undertaken a Local Democracy Review. In Spring 2019, 57 recommendations made by the review were agreed by Mayor and all councillors. The Council is in the process of taking forward these recommendations.	No change.
Home Builders Federation	2	QD 01	**QD1 Delivering high quality design in Lewisham** Paragraph 130 of the NPPF allows for poorly designed development to be refused. It would assist developers greatly and speed-up the decision-making process if the Council produced its own design code for development in Lewisham or referred to the National Design Guidance and the National Model Design Code if it is unable to produce one. Currently there is too much uncertainty in the process. We acknowledge the time and resource constraints for local authority planning departments, but there is also a pressing need to deliver homes more quickly, especially in London. If the draft policy could refer to the National Model Design Code as the accepted model that developers should follow, this would greatly assist the development industry. The current wording of the policy is generis to all the borough and establishes very broad principles that applicants should consider. Ideally, the Council should engage with it communities to develop local design guidance for different localities as this would provide applicants with a clearer expectation of what is expected. In the absence of this, and for this reason, we would tend to favour a reference to the National Model Design Code as providing applicants with a stronger steer for what is to be expected by the decision-makers within the local authority. We note Part L. This requires applicants to have regard to feedback from Lewisham's independent Design Review Panel. The London Plan encourages design-review. The problem for applicants is that this would need to be integrated as part of the pre-application process, to avoid delay associated with disagreements over design once an application has been submitted. The Council will also need to give some thought as to how applicants who have not engaged in pre-application discussions will be dealt with in this process, as they may not have had the benefit of design review. The process would be easier if the Council did prepare a design code, or at least referred to the National Model Design Code as the default guidance.	Noted. The Council has and will continue to prepare planning guidance to support the implementation of the Local Plan. The preparation of future guidance documents, including Design Codes, will be subject to resources available. The draft Local Plan design policies are considered to provide sufficiently flexibility for development proposals to respond to individual site circumstances, without being overly prescriptive. However it is acknowledged that reference to principles of the National Design Guide may be beneficial and will be referred in the plan. Where Design Codes are prepared, either by applicants or the Council, a reference will be made to ensure these reflect the National Model Design Code. In line with the London Plan, the Council strongly encourages that development proposals are taken to the Design Review Panel, particularly for major or complex schemes. Whilst acknowledging that this may add an additional step to the planning process, it may not necessarily result in delays overall. Early stage review of schemes can assist with identifying and resolving key planning and design issues at the front-end of the process, which might otherwise not be flagged or adequately addressed until the formal planning application stage.	Local Plan Policy QD1 supporting text amended to refer to National Design Guide.

Lee Manor Society	2	QD 01	Mention is made of the need for **consultation** with local communities, but we see no reference to the role of **Conservation Areas** and residents' groups – such as the Lee Manor Society – in the process. They are often the only local organisations with the resources and focus to make a strong case against bad schemes. The loss of the fortnightly Amenity Societies Panel has reduced their ability to interact with planners and diminished the quality of local input to planning decisions. Self-congratulatory mention is made in the plan of the Design Panel, comprising professional architects. This is a useful body but, we 3 have found, can lack awareness of the local context provided by conservation groups. We see no mention of the role of conservation areas in the planning mix despite their important role in preserving local character and heritage. We hope this is because nothing in the plan will change or reduce their ability to fulfil this role.	Noted. The draft Local Plan Policy QD1 makes clear that applicants should work closely with local communities and others likely to be affected by new development. In addition, the Council's adopted Statement of Community Involvement sets out the procedures for consulting the public on planning decisions, including planning applications. The draft Local Plan Part 2 policies on Heritage address conservation areas and the need to preserve or enhance their significance.	Local Plan amended to make reference to role of residents' groups and amenity societies in supporting the plan's implementation.
Lewisham Pedestrians	2	QD 01	**Principles for determining planning applications – the Local Plan** • Developments should be permeable for people walking – this means increased permeability so that residents are given access in all directions that have now, or may reasonably have in the future, access to the public realm. • Maintain at least 60mm kerbs to separate pedestrians from vehicles (including bicycles) with white painted tops. This not only re-enforces safe separation but also helps younger children, people with vision-impairment and dogs to identify the kerb edge.	Noted. The draft Local Plan Part 2 design policies clearly set out the need for the movement and connective function of the public realm to be addressed to ensure that development provides for coherent relationships and good connections within and between sites and neighbourhoods, as well as public transport, and maximises opportunities for creating new connections. The draft Local Plan sets out requirement for development to ensure inclusive and safe design for people of all backgrounds, abilities and age groups. For example, this is addressed by draft Policy QD1 Delivering High Quality Design, QD2 Inclusive and safe design and QD3 Public realm.	No change.
London Wildlife Trust	2	QD 01	We welcome and support, this policy especially references under Parts Da and J, and M. On the latter (and supporting para 5.10), of matters pertaining biodiversity, we recommend that applicants of development proposals above a certain scale or likely impact on a SINC should engage with the Lewisham Biodiversity Partnership.	Support noted.	Local Plan policy GR03 amended with additional criterion to encourage major development proposals adjacent to a SINC site, or with the potential to affect one, to engage with the Lewisham Biodiversity Partnership.
NHS (HUDU)	2	QD 01	**QD1 Delivering High Quality Design in Lewisham** This policy is supported as a whole. However, we suggest Clause Ge explicitly refers to the internal quality of buildings and to the wider development. The policy is positively worded	Support noted. Draft Local Plan Policy QD1 is considered sufficiently robust and worded to ensure health and well-being considerations apply to all buildings and spaces, whether indoor or outdoor.	Local Plan updated to include a new standalone

			regarding developments contributing to physical and mental health, however, there appears to be no reference to requiring Health Impact Assessments (HIAs) for major developments. HIAs are included in the glossary and list of abbreviations. A requirement for an HIA as part of the validation for schemes comprising say 50+ homes should be incorporated within this or another policy. This is an approach taken by many LPAs. The HUDU website provides guidance and details of the different types of HIAs at https://www.healthyurbandevelopment.nhs.uk/our-services/delivering-healthy-urban-development/health-impact-assessment.		policy on Health Impact Assessments.
South East London Labour for a Green New Deal	2	QD 01	There are references to an Independent Design Review Panel. The panel includes qualified architects of well known firms, but their CVs, although they show significant knowledge and understanding of development in London, do not bring to the fore experience of more innovative technologies such as Passivhaus standards, carbon neutral building, renewable energy or building to support wildlife diversity. Similarly there appears to be no community input from people who live in more deprived areas of the borough and have direct experience of what housing and infrastructure needs are. There is nothing about age, or disability needs. Judging from the CVs it feels that the Panel needs a more diverse range of voices, including from local residents and group. The plan could be the opportunity to review how this panel works, its scope and role in the planning process and set an example for other local authorities in the country.	Noted. The draft Local Plan Policy QD1 makes clear that applicants should work closely with local communities and others likely to be affected by new development. In addition, the Council's adopted Statement of Community Involvement sets out the procedures for consulting the public on planning decisions, including planning applications. Whilst the Local Plan supports that planning proposals are taken to the Council's Design Review Panel, the Governance arrangements and membership of the panel are outside the scope of the Local Plan. The current panel has been established through a competitive application process, with members selected on the basis of a wide range of factors, including experience, critical ability, and understanding of development pressures facing the local area.	No change.
Telegraph Hill Society	2	QD 01	As the 2018 report on housing density to the Greater London Authority made clear in its survey of high rise high density housing in London: "For the market sector, the new schemes are residences for one stage of the lifecycle— broadly speaking young professionals. While in theory they could also attract older downsizers, the responses to our survey suggested there were not many of them. And it is unusual for families with children to live in market-price units (whether owned or rented) in modern dense schemes. A high proportion of children are in social tenant households who have less effective choice. This is a question of cultural preference (most people aspired to live in houses with gardens) but also of affordability: some people said they enjoyed living where they were now but would never be able to afford a family-sized unit in the same schemes and would perforce have to move if they had children." Create Streets in their report on Liveable Communities emphasise the same point: In poll after poll it is clear that most British people (and most people around the world) would rather live in houses in streets than flats and would almost always avoid tower blocks. In the most recent national survey, in December 2013, 80% of respondents wanted to live in a house and 6% in a flat in a	Noted. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs Local Plans to identify locations that may be suitable for tall buildings and to set parameters for building heights. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			modest building consisting of fewer than 10 units. Only 3% wanted to live in a building with more than 10 units in it. They continue: Another recent Ipsos-MORI survey in London was limited to those aged over 64 (a group less likely to support tower block living) and included those between 16 and 18 (a group more likely to support tower block living).Despite this, the results were still clear-cut. Only 27% of those polled would be 'happy living in a tall building.' In contrast 56% would not be happy. The desire not to live in a tall building was also more strongly held. 29% felt strongly about not living in a tower block. Only 10% felt strongly about wanting to live in one. This survey was corroborated by a YouGov poll which found that only 33% of Londoners supported more-high rise residential towers. 65. The same research supports shows a strong preference for residents to live in lower rise more traditional developments of the type which encourage community and cohesion , lowers community stress and more general contributes to addressing the wider issues of physical and mental health envisaged in **Strategic Objective G16** in a way that high-rise developments do not. This type of development, which can be relatively dense, is exemplified by the redevelopment in the Honor Oak estate in the 1990s, and (a decade or so earlier) the bungalows and town houses in the Somerville Estate. Further back in time examples such Fairlawn Mansions on the New Cross Road show how higher density can be achieved without entirely destroying the unique heritage and appearance of an area.		
Telegraph Hill Society	2	QD 01	We set out in Appendix 1 the basic criteria which CreateStreet's research has shown would lead to development which people feel would lead to healthy communities in which they would wish to live throughout their lives. We strongly urge that the Council's Development plan be re-written to take into account these principles as a "community-led" rather than a "design-led" and "housing target" led document which will not meet the Borough's Strategic Objectives.	Noted. The design-led approach is set out in the London Plan, which the Local Plan must be in general conformity with. However it is agreed that local communities should be engaged in the design-led approach and development process. Therefore, the draft Local Plan policy QD1 states that applicants should work closely with local communities and others likely to be affected by new development to understand the local and distinctive context of the site, as well as to consider design options that respond positively to this context.	No change.
Telegraph Hill Society	2	QD 01	Accepting that good design is a matter of taste, there must be better examples of development than those illustrating the Plan and Part Two in particular. Amongst other issues, we would note the following. • There are many examples of high-rise buildings given, but even where illustrations meant to be of heritage assets, there are none of the Victorian housing stock that makes up the majority of the Borough. • The illustration on **page 138** of backland development is unsympathetic given the buildings on either side of it (see our comment in paragraph 129 below and our examples of sympathetic brown field development).	Noted. The photos included in the draft Local Plan are provided for illustrative purposes only and do not carry material weight for planning decisions. As the plan is progressed through the next stages of the process, the Council may take the opportunity to update these, subject to resources available.	No change.

			• The illustration on **page 193** shows a particularly unsatisfactory infill development which, in our view, should be avoided as it can hardly be said to articulate with or complement the properties on either side. We refer in paragraph 65 to some examples of new build which could be used as examples. Further examples are illustrated in paragraph 129.		
Telegraph Hill Society	2	QD 01	We are extremely worried that such illustrations will be taken as indicative of what is considered to be "good" design, accepting again that some people may think it is. Either a broader range of illustrations needs to be given or, and this may be preferable given the size of the document, all illustrations should be removed. If illustrations are to remain, a caveat should be given that they do not necessarily represent best practice.	Noted. The photos included in the draft Local Plan are provided for illustrative purposes only and do not carry material weight for planning decisions. As the plan is progressed through the next stages of the process, the Council may take the opportunity to update these, subject to resources available.	No change.
Telegraph Hill Society	2	QD 01	We support **QD1.A** to **QD1.D**.	Support noted.	No change.
Telegraph Hill Society	2	QD 01	**QD1.H** The design of a new development should pay attention to any impact on traffic flows and volumes in the surrounding neighbourhood. Particularly where parking is limited the design must ensure it does not impact adversely on the amenities of the surrounding area through overflow parking.	Noted. These matters are addressed in draft Local Plan part 2 section on Transport and Connectivity. The plan must be read as a whole for planning decisions. In general, the draft Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions.	No change.
Telegraph Hill Society	2	QD 01	**5.6** states "We will work positively and proactively with development industry partners and other key stakeholder [sic] to secure the delivery of high quality design in Lewisham." The Glossary does not define key stakeholders. The definition should make it clear that existing residents are key stakeholders. See our comments the need for the involvement of communities at paragraph 11 and paragraphs 260 to 263 and 266 to 267)	Noted. The draft Local Plan Policy QD1 makes clear that applicants should work closely with local communities and others likely to be affected by new development. In addition, the Council's adopted Statement of Community Involvement sets out the procedures for consulting the public on planning decisions, including planning applications. To aid with clarity, paragraph 5.6 will be deleted from the plan.	Local Plan amended to delete policy supporting text paragraph 5.6. A new reference to the adopted Statement of Community Involvement (SCI) is included as an informative regarding Council's procedures for consulting the public on planning decisions.
Telegraph Hill Society	2	QD 01	**5.8 – 5.9** We note that, in the context to our concern above, there is no commitment in this paragraph to re-starting the Amenity Societies Panel when funds are available. Whilst it is necessary to have professional design experts it is also just as	Noted. The draft Local Plan Policy QD1 makes clear that applicants should work closely with local communities and others likely to be affected by new development.	Local Plan amended to make reference to role of

			important to engage with local residents' groups (who should also be regarded as key stakeholders) and who have unparalleled detailed knowledge of their local area.		residents' groups and amenity societies in supporting the plan's implementation.
The St John's Society	2	QD 01	HIGH QUALITY DESIGN More emphasis and weight should be given to innovation and exceptional design.	Noted. The draft Local Plan policies make clear that development proposals should deliver 'high quality design'. The policies are not considered to preclude innovative design where this is of a high quality and satisfies other Local Plan requirements. The suite of design policies are considered to provide a significant step change in approach to securing high quality design, when compared to the Council's adopted Local Plan.	No change.
The St John's Society	2	QD 01	HERITAGE The borough needs to take a more active interest in its highways and the enforcement of consistency and quality of the finishes, particularly following utilities repair works – key examples can be found right outside the Council offices in Catford where high quality paving is replaced with tarmac.	Noted. The draft Local Plan part 2 policies on Heritage address designated and non-designated heritage assets. The draft Policy QD3 seeks to ensure that development provides for high quality public realm, which will include consideration of footpaths and roads. Regarding comments on public realm replacement and repair following works, these will be forwarded to colleagues in the Council's Transport service.	No change.
Transport for London	2	QD 01	We welcome the integrated approach taken in section G(b) to create 'places for people' by focusing on the design of walking, cycle parking and bus stops within the public realm, and role of reducing vehicle dominance.	Support noted.	No change.
	2	QD 01	Modern developments seem to build as many 'house' type properties as possible thus providing the occupants with outdoor space. The last year would be a major reason to try and replicate this.	Noted. The draft Local Plan proposes to apply the London Plan housing standards, including for indoor and outdoor amenity space. The Local Plan is required to be in general conformity with the London Plan.	No change.
	2	QD 01	The plans appear to be focussed on numbers of dwellings with no consideration for quality of life.	Disagree. Whilst the Local Plan must demonstrate how it will meet identified needs for housing, including the borough-level housing target set by the London Plan, it includes a wide range of policies which address and seek to improve the quality of life of the local population, in line with the Good Growth policies and principles of the London Plan. The Local Plan has been informed by Integrated Impact Assessment, which includes considerations for Strategic Environmental Assessment, Sustainability Appraisal, Health Impact Assessment, and Equalities Impact Assessment.	No change.
	2	QD 01	There does not appear to be a guide to the size of dwellings being provided. Families need three /four bedroom accommodation otherwise the development becomes unsuitable as each child is born and the site becomes a stepping stone to one with more accommodation.	Noted. The draft Local Plan proposes to apply the London Plan housing standards, which incorporate the nationally described space standards for dwellings. The Local Plan has been informed by a Strategic Housing Market Needs Assessment (SHMA), which provides an	Local Plan amended to include a target housing size mix for affordable housing.

				indication of need for family sized units. It is acknowledged that the plan could benefit from further details around meeting this need.	
	2	QD 02	Women's safety on streets. Specifically, planning policy should ensure that new housing and other development faces the street or road. This would then limit the height of fences adjoining the footpath. The Garden Close Estate in Grove Park was built with the houses facing inward, resulting in the rear garden fences adjoining the pavement around the corner of Baring Road and down Chinbrook Road. These are 6 ft. high and therefore the stretch of road from the corner down to the bus stop and beyond has always felt very intimidating. There are no house lights or gates on that side of the road, so no possibility of being seen or getting help in an emergency. I don't know how many other developments around Lewisham have been built in this way, but there must be some. It is probably lovely to live in, but it makes the street feel very unsafe after dark. Perhaps a policy which considers this important issue could be added to the new Lewisham Development Plan currently undergoing consultation.	Noted. Local Plan Part 2 policy QD2 on inclusive and safe design states that we will strongly encourage the use of 'Secured by Design' principles to help reduce crime and improve perceptions of safety. This includes measures to encourage passive surveillance, including through the integration of active frontages and other interventions to promote street level activity.	Local Plan amended to mention women's safety in relation to the 'secured by design' principles
Home Builders Federation	2	QD 02	**QD2 Inclusive and safe design** We note Part D. This repeats London Plan policy, so in theory it is unnecessary for the Council to refer to this in its Plan. However, we appreciate that this may provide helpful for developers. It would be helpful if the Council explained how this policy would apply to minor developments (ten homes or fewer) and whether there is a requirement to provide 'at least 10% of homes' built to Part M4 (3). This policy works for larger schemes but less so for minor ones. We welcome the acknowledgement in paragraph 5.16 about the suitability of a site to accommodate homes built to the Part M4 (3) standard. We welcome this flexibility.	Noted.	Local Plan amended to provide clarity on application of M4(3) targets for major and minor developments.
London Wildlife Trust	2	QD 02	We welcome and support this policy.	Support noted.	No change.
Telegraph Hill Society	2	QD 02	**QD2.C** The objections to gated developments also apply to blocks of flats which are simply gated vertical developments. Either gated developments should be allowed, or policies should be required to ensure that, particularly, larger blocks of flats are open. Examples abound at present where such blocks restrict or prevent access (vide **QD2.B.b**) and create a closed community which does not engage with the surrounding area. Such access would be particularly important for example where	Noted. The draft Local Plan policy QD02 seeks to ensure inclusive and safe design principles are embedded in the design-led approach, including by restricting new gated developments. The policy acknowledges that gates or access restrictions may be warranted in some instances due to health and safety reasons. The policy approach has been informed by good practice guidance and local learnings from existing authorised	No change.

			a development includes roof gardens when considered in the context of *"green open space".*	developments, access and permeability could have been better addressed.	
Telegraph Hill Society	2	QD 02	It is unclear as to how the 10% criterion in **QD2** will work on small developments. Does it apply to flat conversions? How does it work in Conservation Areas where the overriding need would be for conformity to the existing housing stock which may be Victorian and not able to meet this criterion? There needs to be clarity on this in order to prevent issues on appeal. We would suggest that the 10% criterion should not apply to flat conversions and that design and heritage issues must take precedence over other considerations within Conservation Areas and for other Heritage Assets unless the law provides otherwise.	Noted.	Local Plan amended to provide clarity on application of M4(3) targets for major and minor developments.
	2	QD 03	p105 QD3 5.26 (Public Realm) New developments should include overhanging balconies or colonnades at street level to allow refuges for people in extreme weather events likely in developing Climate Change manifestations. Some resulting semi covered spaces can also be used for window shopping, cafe culture/night time economy or informal bus shelters in inclement weather.	Noted. It may not be feasible to require overhanging balconies or colonnades in all circumstances. Draft Local Plan policy QD3 provides scope for a range of measures to be integrated into the public realm to address microclimate affects and people's comfort.	No change.
Blackheath Society no 2	2	QD 03	**QD3 Public realm & connecting places**. Welcome guidance on designing and maintaining high standard of public realm that is functionally useful in connecting places. Would welcome more emphasis on ensuring that it is big enough, open enough and green enough to provide less tangible health and well-being benefits for high density residents and visitors, and is well maintained in perpetuity. Ideally, developments should *increase* the amount of public realm, especially green space and trees. Daylight/sunlight standards should exceed BRE minima, which are very low for public realm. These aspects are arguably more important than public art.	Noted. Draft policy QD3 will be amended to provide additional criteria in response to matters raised. Amenity considerations for the public realm, such as daylight and sunlight, are addressed elsewhere in the draft Local Plan.	Local Plan policy QD3 amended to state that development proposals must investigate and maximise opportunities to enhance the public realm. Local Plan policy QD3 amended to include an additional criterion on urban greening and tree planting in the public realm. Local Plan policy QD3 amended to include an additional criterion on widening pavements.

Home Builders Federation	2	QD 03	**QD3 Public realm and connecting places** We note the requirements of Part G. The Council will need to clarify how these requirements (such as public toilet conveniences and water fountains) will be paid-for in the longer term. Part L of the policy makes a general statement that this could be funded through developer contributions or legal agreements, but this may not be feasible in the future especially if we move towards an infrastructure tariff (as proposed by the Government's Planning White Paper and the Planning Bill). It could be the case that the developer will only be expected to pay a tariff, but long-term maintenance will be the responsibility of a management company or the Council especially if the public realm is expected to be open to the public.	Noted. Maintenance arrangements will be considered on a case-by-case basis, having regard to extant planning policy and legislation. As set out in draft Policy QD3, the expectation is that this will be funded through developer contributions or legal agreements. This may also include scope for assigned management companies.	No change.
Lee Forum	2	QD 03	Public realm should ensure pedestrians have sufficient space available, are protected from road users and wheeled users in the public realm and importantly are protected against harmful road and building pollutants through design and green screening.	Noted. These points are addressed in the draft Local Plan policies QD3 public realm and TR3 Healthy streets as part of healthy neighbourhoods, which include reference to the Healthy Streets approach. Policy QD3 will be amended with an additional criterion around space for users.	Local Plan policy QD3 amended to include an additional criterion on widening pavements.
Lee Forum	2	QD 03	The online session raised the point that pedestrians don't have their own strategy; public transport, traffic and cycling do, yet more journeys are taken by foot than by other means. The Local Plan needs to detail what are the standards for pavements and space, safe crossings, cyclists and e scooters, pavement parking and other obstacles like retail bins on pavements? We would like to see a pedestrian strategy designed and included in the local plan.	Noted. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set out clearly in Part 2 Transport policies, as well as the High Quality Design policies, including QD3 public realm. The Government Department for Transport has published the Manual for Streets, which is considered good practice guidance for street design and the public realm. It is acknowledged that the plan could benefit with a reference to this.	Local Plan policy QD3 supporting text amended to refer to Manual for Streets.
Lewisham Pedestrians	2	QD 03	**Principles for determining planning applications – the Local Plan** • Service boxes (including EV charging facilities) should not be located on the footway. • Larger developments should design-out crime by ensuring that all public spaces are overlooked from commonly used windows in dwellings. This may impact, for example, on the use of ground floor accommodation being used far more extensively for residential use rather than service, commercial or storage. This arrangement will encourage people to walk to, from and within developments.	These detailed comments are beyond the scope of the Local Plan and will be passed on to our Highways team.	No change.

			• Safety lighting should only use lighting columns placed on the footway as a last resort. Where an applicant uses this last resort then they must show that comfortable widths for people walking have been maintained. • Footways on new developments should be demonstrably wide enough to allow two people to walk alongside each other, wheelchair users and buggies to pass and for people to comfortably pause and linger without feeling as though they are obstructing others. • The government have recently **announced** that the new cycling and walking infrastructure strategy (CWIS 2) will reflect the new policies outlined in ***Gear Change*** and ***LTN 1/120*****.** Significantly this will mean that "cyclists are vehicles" and that "cyclists and pedestrians should not share the same spaces". These principles should inform the Local Plan and should apply to all shared public and private realms. • There should be a clear and well maintained dedicated pedestrian route from primary building entrances to the footway in the public realm. This should apply equally to small and large developments. Hard standing storage for motor vehicles should not be considered as part of a pedestrian route.		
London Wildlife Trust	2	QD 03	We welcome and support this policy, especially the reference to greening under H). However, it will be useful to define what 'public realm' means; that set out in supporting para 5.19 gives suggested typologies, but it we presume it is largely 'grey' hard surfaced space as opposed to predominantly green vegetated spaces (many of which are also public).	Support noted. Public realm is defined in the first paragraph of the policy supporting text.	No change.
Make Lee Green	2	QD 03 TR 03	**Action for Pedestrians** In Lee Green we would like to see the following principles applied to all new developments so that walking is enabled and encouraged. - Gear Change and LTN 1/20 include bicycles as vehicles and that cyclists and pedestrians should not share the same spaces - this new guidance should apply to all shared public and private realm. - Maintain at least 60mm kerbs to separate pedestrians from vehicles (including bicycles) with white painted tops. This not only re-enforces safe separation but also helps children, people with vision-impairment and dogs to identify the kerb edge. - Developments should be permeable for people walking – this means increased permeability so that residents	These detailed comments are beyond the scope of the Local Plan and will be passed on to our Highways team.	No change.

			are facilitated in walking in any direction from development. - Minimise the amount of hard surface and maximise natural, planted areas in order to reduce rainwater runoff into the waste water system. - Place all residential parking to the edges so that if private vehicle ownership declines then that space can be re-purposed as green space - "Easy to live in and difficult to drive in" should be adopted by the designers - or "better for people and better for the planet". - Residential and commercial waste should not be stored on the footway at any time. - Designers should read and understand the Create Streets document "The bin-lorry effect" and reduce the amount of space given over to service functions. - Lighting columns should be placed so the footway maintains comfortable widths for people walking. - Service boxes should not be located on the footway. - Footways on new developments should be wide enough to allow two people to walk alongside each other, wheelchair users and buggies to pass and for people to comfortably pause and linger without feeling as though they are obstructing others - Each off-street motor vehicle parking space must have electric vehicle charging functionality (the current plan is for a rather poor 20%).		
Telegraph Hill Society	2	QD 03	**QD3** should ensure that public realm improvements look attractive and integrate into the surrounding streetscape.	Noted. This matter is considered to be suitably addressed by draft Local Plan Policy QD3, particularly QD3.B which provides a cross-reference to Policy QD1 and the design-led approach	No change.
Telegraph Hill Society	2	QD 03	To meet the aspirations of the Vision that Lewisham should be a desirable place to live there is an overriding need to pay attention to our existing public realm as well as to new development.	Agreed. The Local Plan will be used as both a tool to assess new planning applications and as a strategy to support investment locally. High quality public realm is a key element of the draft Local Plan.	No change.
Telegraph Hill Society	2	QD 03	In order to address the points in paragraphs 83 and 84 in detail, the Council should prepare Streetscape policies for the Borough which apply both to new developments and to the works carried out on the public realm by the Council. The Borough had developed a Streetscape guide but this is no longer adhered to. An updated version of this should be introduced as soon as possible, with the commitment to do so referenced in the Local Plan.	Noted. The Government Department for Transport has published the Manual for Streets, which is considered good practice guidance for street design and the public realm. It is acknowledged that the plan could benefit with a reference to this.	Local Plan policy QD3 supporting text amended to refer to Manual for Streets.
Transport for London	2	QD 03	In QD3 (B, C and E), we also welcome references to a design-led approach (QD1) to create a vibrant public realm. References to TR3 Healthy Streets and the integration of existing and planned public transport infrastructure are similarly welcomed.	Support noted.	No change.
	2	QD 04	Local Plan Objections / I already wrote in with some objections and comments. I wish to add some here.	Noted. The London Plan policy D12 addresses with Fire Safety, which all new development proposals must have	Local Plan amended to include a target

			1. HIGH RISE BUILDINGS: We have recently seen from the report on the Borough of Croydon. High Rise buildings are hard to maintain, the result being that all repairs are considerably more expensive and the freeholders tend to delay them until it is too late. It is also dangerous to build blocks that are taller than firemen can access. It is not more training the fire brigade need, but the removal of a threat to life from buildings with storeys that cannot safely be reached. Too many of the plans for these tower blocks are for small apartments- i.e. basically dormitories. People who want a family would be unable to live there. With the drastically changing panorama of work life, dormitories are likely to be of little use in the future. Only today Nationwide announced it will allow its employees to work from anywhere in the country. The borough does not need more dormitories. It needs family homes and to realistic Parker Morris standards. Is it not wiser to actually build homes that people like, and WANT to live in? The Better Buildings reports (Roger Scruton) are sensible and practical as well. I have heard that one of justifications for building new tower blocks in Lewisham is that there are 10,000 families on the housing list, but from the plans we have seen (including Besson St. and Sainsburys) NONE of these are designed to be family homes at all. Why this discrepancy?	regard to. There are also Building Regulations covering fire safety. The Council has prepared a Strategic Housing Market Assessment (SHMA). The study looks at housing needs across the borough, including for different groups (such as families), and has informed the preparation of the draft Local Plan. The Part 2 Housing policies broadly seek to ensure that new development proposals contributes to addressing identified housing needs. However it is acknowledged that the Local Plan could benefit from further details on housing size mix. The draft Local Plan proposes to apply the London Plan housing standards, including for indoor and outdoor amenity space and children's play space. It is considered that family sized housing units can be appropriately integrated into tall buildings.	housing size mix.
	2	QD 04	High Rise: Tower blocks are not desirable anywhere in the UK. Blocks of flat at 6-7 storeys high are acceptable in most places- fire engines can reach all floors without a problem- Also usable balconies, not Juliet balconies, make a massive difference, as we can see in the Catford Green building illustrated in your plan. One successful example are the two tower blocks facing Lewisham Hospital. They are attractive to the eye for being placed in gardens, I know nothing about the inner working or whether they are successful apartments inside though. In this country, however, it is usually hard to provide wide enough spaces around these buildings. Too many high-rise developments result in tower blocks that are extremely unfriendly, intimidating, ugly, tightly packed together and thus totally impractical for families. Among examples are the nightmare of concrete that is now the centre of Lewisham. I doubt those apartments could ever be 'homes'. They look like transient, temporary dormitories, designed on the cheap for maximum rental benefit.	Noted. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. Both the London Plan and the draft Local Plan Policy QD4 set policies for the design of tall buildings, which include considerations for visual, functional, environmental and cumulative impacts. The draft Local Plan proposes to apply the London Plan housing standards, including indoor and outdoor amenity space and children's play space.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
	2	QD 04	The relentless drive towards higher and higher densities actively enforced by the GLA, especially on sites with good and even not so good transport accessibility has led to the march of the tower block, always filling the whole site and with no landscaped setting. We are concerned that the inclusion of clusters of towers on the Catford Island, Wickes and Town Hall sites, if ever amalgamated will lead to a sterile, windy and hard	The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall	Local Plan amended with more detailed requirements on buildings heights, informed by the

			paved environment which will impact on the skyline and outlook for the surrounding residential neighbourhoods, add more traffic to the already congested traffic jam that is the south circular, do nothing to provide good quality family housing for all those families living in overcrowded conditions or on the waiting list, add to the pressure on the overcrowded trains and rail platforms at the two Catford Stations, and add to more people living in an area with appallingly poor air quality.	Buildings Study, which has informed the Regulation 19 document. The study has identified Catford town centre as a location that is suitable for tall buildings. Both the London Plan and the draft Local Plan Policy QD4 set policies for the design of tall buildings, which include considerations for visual, functional, environmental and cumulative impacts.	Tall Buildings Study update.
	2	QD 04	In considering high density sites and whether tall blocks are acceptable you should actively encourage the use of perimeter blocks or mansion block styles, as well as terraced housing which all achieve very similar densities and are more people friendly especially if combined with significant areas of green usable public open space and play areas aimed at various age groups.	Noted. The draft Local plan Policy QD6 Optimising site capacity emphasises that the optimal capacity of a site does not mean the maximum capacity. Accordingly, the promotion of higher density development in appropriate locations does not imply that tall buildings are necessary. Higher density can be delivered through a wide range of site layouts and building typologies, including mid-rise developments that are reminiscent of historic mansion blocks but with modern specifications. The draft Local Plan proposes to apply the London Plan housing standards, including indoor and outdoor amenity space and children's play space.	No change.
	2	QD 04	Tall Blocks: The relentless drive towards higher and higher densities actively enforced by the GLA, especially on sites with good and even not so good transport accessibility has led to the march of the tower block, always filling the whole site and with no landscaped setting. We are concerned that the inclusion of clusters of towers on the Catford Island, Wickes and Town Hall sites, if ever amalgamated will lead to a sterile, windy and hard paved environment which will impact on the skyline and outlook for the surrounding residential neighbourhoods, add more traffic to the already congested traffic jam that is the south circular, do nothing to provide good quality family housing for all those families living in overcrowded conditions or on the waiting list, add to the pressure on the overcrowded trains and rail platforms at the two Catford Stations, and add to more people living in an area with appallingly poor air quality. We have been very disappointed by the very poor quality of design of Lewisham Gateway. The replacement of the previous roundabout with a new set of junctions seems to have led to worse traffic jams than before, buses stacked up trying to get through, a terrible pedestrian experience with desire lines ignored, awful wind tunnel effects on occasions and a complete failure to improve the rivers running through the scheme which remain immured in concrete and barely visible and contributing nothing to improving the opportunities for wildlife and biodiversity, never mind there being no green space just some paving and a few random planters. If this is the	Noted. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The draft Local Plan Part 2 Policy QD4 sets out requirements for tall buildings, in line with the London Plan. The draft Local plan Policy QD6 Optimising site capacity emphasises that the optimal capacity of a site does not mean the maximum capacity. Accordingly, the promotion of higher density development in appropriate locations does not imply that tall buildings are necessary. Higher density can be delivered through a wide range of site layouts and building typologies, including mid-rise developments that are reminiscent of historic mansion blocks but with modern specifications. The London Plan policy D12 addresses with Fire Safety, which all new development proposals must have regard to. There are also Building Regulations covering fire safety.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.

			standard of what is to come in Catford then we will be objecting vigorously . In considering high density sites and whether tall blocks are acceptable you should actively encourage the use of perimeter blocks or mansion block styles, as well as terraced housing which all achieve very similar densities and are more people friendly especially if combined with significant areas of green usable public open space and play areas aimed at various age groups. You should also bear in mind the tragic Grenfell fire and its causes. Most tower blocks were built with a 60 year life, or even shorter in the case of office blocks, with poor thermal insulation and the use of a variety of cladding systems. A lot of the previous residential towers were built by local authorities in the 60's and 70's under a system where the government would only allow them to borrow to build units of this type. Many suffered from very poor insulation, water ingress, poor systems building techniques and failing cladding. Recladding them to try to tackle some of these problems and make them look 'prettier' led to Grenfell. A lot of the new residential towers appear to utilise office block building techniques with concrete cores and frames and cladding panels bolted on or the use of steel frames, both with a very high level of embedded carbon. If a high proportion of these flats are for sale and the buyers expect to have a 99 year lease on a building which probably has a shorter shelf life or needs remedial work or re cladding after 40 or 50 years, what then? At the very least the planning system needs to ask very firm questions through policies about the life span of the building etc. Grenfell has shown how the current system of building regulations and approved inspectors is not fit for purpose and cannot be relied on.		
	2	QD 04	Thank you for your information about this project. I am in favour of more housing but would not be happy with high rise flats. They should be no higher than 11 stories to be in keeping with other flats in the vicinity.	Noted. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
	2	QD 04	There are issues around tall towers. The area around the shopping centre in Lewisham is an example of a concentrated push by Lewisham to push high rise living in the area. It is a mis-mash of very tall towers that do provide great living conditions for young families. There is very limited green space	Noted. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights.	Local Plan amended with more detailed requirements on buildings heights,

			or play space for young children which is detrimental to both their physical and mental health.	The draft Local Plan has been informed by a Tall Buildings Study. This identifies Lewisham town centre and surrounds as a suitable location for tall buildings. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The draft Local Plan proposes to apply the London Plan housing standards, including indoor and outdoor amenity space and children's play space.	informed by the Tall Buildings Study update.
Blackheath Society no 2	2	QD 04	**QD4 Building heights**. New, more explicit/complex definition of tall/taller is useful. 'Taller' is explained (just once at 5.29) as '2 to 3 storeys above… buildings and structures within a site's immediate and surrounding area', but this is not included as a definition in the policy, as it should be. It may well be a crucial definition for areas with historic buildings, like Blackheath. 'Tall' is defined as 30m or more in height [approx. 8/9 storeys] except on riverfront where it is 25m. This fails to address the issue of very tall towers (say, >80m /25storeys] which have started to spring up in Lewisham town centre and are therefore now considered acceptable in areas designated suitable for tall buildings (Fig 5.1), despite being significantly taller than anything seen in Lewisham before 2000, and much taller than neighbouring Victorian/Edwardian residential neighbourhoods/CAs. Applications for these towers met strong local opposition on varied of grounds. A tough policy is needed on very tall towers, so that they meet the very highest standards of design, do not lead to undue density and are sensitive to situation. The policy also needs to tackle issues of clusters of tall towers close together; the 'arms race' in so-called 'landmark' or 'marker' buildings; their impact on the wider skyline and local views; defining emerging context/precedent (so that it doesn't include applications approved but not yet built, meaning there has been no opportunity to assess real-life impact); ensuring adequate green public realm (including trees) that is not cramped and overshadowed; light and wind impacts and standards to be met, which arguably need to be more rigorously than the BRE recommended minimum which fails to provide adequate protection for residents and visitors in/near new developments. Explanation at 5.35 is a developers' charter for ever higher and denser development e.g. in Lewisham town centre, given recently built and consented towers.	Noted. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. Both the London Plan and the draft Local Plan Policy QD4 set policies for the design of tall buildings, which include considerations for visual, functional, environmental and cumulative impacts.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
Blackheath Society no 2	2	QD 04	Use of green shading on Fig 5.1 to highlight areas suitable for tall buildings, as well as for parks, is very unhelpful and potentially misleading. Don't use green for tall.	Noted. The London Plan directs the Local Plan to identify locations appropriate for tall buildings. Draft Local Plan Policy QD4 and associated map give effect to the London Plan. Colour scheme used for the map is not considered to materially impact on the policy.	No change.

Blackheath Society no 2	2	QD 04	**QD4** Policy is now linked very much more strongly to precedent, design and architectural quality, and strategic/ local views; much less to density (now more in **QD6**). Both are very weak on density despite the obvious strong correlation. There are no clear definitions (e.g. high, medium, low) for height or density, no guidelines or limits. Claims that density does not imply that tall buildings are necessary, and can be delivered by mid-rise developments, (5.30) are rarely justified or borne out by events. Density and height seems to be the inevitable result of demanding housing targets and few available site allocations, but this is never acknowledged.	Noted. The draft Local Plan has been informed by a Tall Buildings Study. The policy proposals are considered to be justified by technical evidence. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The London Plan broadly seeks to facilitate sensitive intensification across London to meet needs such as for housing, workspace, and community facilities. The draft Local plan has been prepared within this wider strategic context. Policy QD6 Optimising site capacity emphasises that the optimal capacity of a site does not mean the maximum capacity. Accordingly, the promotion of higher density development in appropriate locations does not imply that tall buildings are necessary. Higher density can be delivered through a wide range of site layouts and building typologies, including mid-rise developments that are reminiscent of historic mansion blocks but with modern specifications.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
Brockley Society	2	QD 04	Page 107, paragraph C: This paragraph implies that the construction of a tall building in an area will justify the construction of others both in that area and in surrounding areas. This should be made subject to a requirement that the construction of tall buildings, individually or cumulatively, must not materially alter the overall built character of an area. This is important because fig 5.1 designates Brockley Road as a location where tall buildings are acceptable in principle. Tall buildings are defined as those which are either 30m+ (approx. 10 storeys) high or significantly taller than the prevailing height of buildings in the immediate area. Once the Social Club is rebuilt that will establish five storeys as the default for Brockley Road, which will mean (I) the entire road is quickly developed to five storeys, and (ii) the presence of five-storey buildings will be used by developers to justify six-storey buildings, and so on.	The London Plan directs the Local Plan to identify locations appropriate for tall buildings, taking into account the built character of the area, and to set parameters for building heights. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has been undertaken, which has informed the Regulation 19 document. Both the London Plan and the draft Local Plan Policy QD4 set policies for the design of tall buildings, which include considerations for visual, functional, environmental and cumulative impacts.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
Culverley Green Residents Association	2	QD 04	**Tall Blocks** The relentless drive towards higher and higher densities actively enforced by the GLA, especially on sites with good and even not so good transport accessibility has led to the march of the tower block, always filling the whole site and with no landscaped setting. We are concerned that the inclusion of clusters of towers on the Catford Island, Wickes and Town Hall sites, if ever amalgamated will lead to a sterile, windy and hard paved environment which will impact on the skyline and outlook for the surrounding residential neighbourhoods, add more traffic to the already congested traffic jam that is the south circular, do nothing to provide good quality family	The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.

			housing for all those families living in overcrowded conditions or on the waiting list, add to the pressure on the overcrowded trains and rail platforms at the two Catford Stations, and add to more people living in an area with appallingly poor air quality. We have been very disappointed by the very poor quality of design of Lewisham Gateway. The replacement of the previous roundabout with a new set of junctions seems to have led to worse traffic jams than before, buses stacked up trying to get through, a terrible pedestrian experience with desire lines ignored, awful wind tunnel effects on occasions and a complete failure to improve the rivers running through the scheme which remain immured in concrete and barely visible and contributing nothing to improving the opportunities for wildlife and biodiversity, never mind there being no green space just some paving and a few random planters. If this is the standard of what is to come in Catford then we will be objecting vigorously. In considering high density sites and whether tall blocks are acceptable you should actively encourage the use of perimeter blocks or mansion block styles, as well as terraced housing which all achieve very similar densities and are more people friendly especially if combined with significant areas of green usable public open space and play areas aimed at various age groups. You should also bear in mind the tragic Grenfell fire and its causes. Most tower blocks were built with a 60 year life, or even shorter in the case of office blocks, with poor thermal insulation and the use of a variety of cladding systems. A lot of the previous residential towers were built by local authorities in the 60's and 70's under a system where the government would only allow them to borrow to build units of this type. Many suffered from very poor insulation, water ingress, poor systems building techniques and failing cladding. Recladding them to try to tackle some of these problems and make them look 'prettier' led to Grenfell. A lot of the new residential towers appear to utilise office block building techniques with concrete cores and frames and cladding panels bolted on or the use of steel frames, both with a very high level of embedded carbon. If a high proportion of these flats are for sale and the buyers expect to have a 99 year lease on a building which probably has a shorter shelf life or needs remedial work or re cladding after 40 or 50 years, what then? At the very least the planning system needs to ask very firm questions through policies about the life span of the building etc. Grenfell has shown how the current system of building	Both the London Plan and the draft Local Plan Policy QD4 set policies for the design of tall buildings, which include considerations for visual, functional, environmental and cumulative impacts. The draft Local plan Policy QD6 Optimising site capacity emphasises that the optimal capacity of a site does not mean the maximum capacity. Accordingly, the promotion of higher density development in appropriate locations does not imply that tall buildings are necessary. Higher density can be delivered through a wide range of site layouts and building typologies, including mid-rise developments that are reminiscent of historic mansion blocks but with modern specifications. The London Plan policy D12 addresses with Fire Safety, which all new development proposals must have regard to. There are also Building Regulations covering fire safety.	

			regulations and approved inspectors is not fit for purpose and cannot be relied on.		
Culverley Green Residents Association	2	QD 04	**There's no acknowledgement of any lessons learnt from the towers of Lewisham** Lewisham Council needs to rebuild its credibility in managing development projects. This is not just because of the development in Lewisham but also other planning controversies, such as Millwall and the missing footbridge at Catford Green/Doggett Road. Everyone I have spoken to about the new towers in Lewisham thinks it is terrible. This may not be your view, but either way there must be some lessons (what went well, what didn't go well) you've learned that will inform how you will manage future developments. Simply ignoring what has happened in central Lewisham gives a strong impression that this is not a reflective organisation and we should not pay much attention to the Council's promises.	Noted. The draft Local Plan sets out a revised suite of policies and approaches to managing new development, including tall buildings. That draft plan has been informed by new evidence and studies, such as the Lewisham Characterisation Study and Tall Buildings Study. At its meeting on 16th September 2020 Mayor & Cabinet agreed the transfer of S106 funding originally proposed for the delivery of a footbridge between Doggett Road and the Barratt's development on the former Catford Greyhound Stadium site to be used to deliver a programme of public realm and accessibility improvements to Catford Station areas. See M&C report for further details.	No change.
Deptford Society	2	QD 04	**Page 107** QD4 (Tall buildings). No explicit mention is made of the need to assess the impact of very tall buildings on pedestrian comfort in terms of the wind microclimate. We would like to see this incorporated as a requirement for new developments over a certain height and particularly where clusters of towers are proposed. Creating a pleasant and comfortable public realm is particularly important where residents have no outdoor space within the block. Existing guidelines on wind-tunnel testing are inadequate and geared towards super-tall buildings only. They fail to recognise the negative street level impact of moderately tall towers. Lewisham could impose its own more stringent requirements. The standard developer tower model seems to be accepted as a *fait accompli*. There are other solutions. Perimeter block development requires more design effort, but can deliver much better housing (and places) at similar densities. QD4 F(e) states that tall buildings should make a 'positive contribution' to the skyline. We question whether it is possible to assess this objectively and what criteria will be used to do so.	Noted. Both the London Plan and the draft Local Plan Policy QD4 set policies for the design of tall buildings, which include considerations for visual, functional, environmental and cumulative impacts. The policies provide for the assessment and consideration of microclimate.	No change.
Deptford Society	2	QD 04 Figure 5.1, 5.2	**Page 111** QD4 This map shows the Deptford Conservation area as suitable for new tall buildings- even though the diagram on the following page clearly identifies Conservation areas as more sensitive areas for tall building development. Why is the Deptford High Street and St Paul's Church CA not assigned the same sensitivity as the Telegraph Hill and Brockley Conservation Areas, especially given that it contains one of only two Grade I listed buildings in the borough?	Noted. The Tall Buildings sensitivity map (Figure 5.2) has been derived through the application of a number of variables, which include but are not limited to listed buildings and Conservation Areas. This will result in variances in sensitivity across the Borough. The draft Local Plan proposes that the tall buildings locations suitability map must be read together with the sensitivity map.	No change.
Greater London Authority	2	QD 04	**Tall Buildings** Local Plan Policy QD4 should be clarified: It is unclear what the height would be for specific localities, as this is set out as 'significantly taller than the prevailing height of buildings in the	Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on

			immediate and surrounding area' in Part D(b). This needs to reflect the lower threshold set out in London Plan Policy D9(A) to ensure the definition of a tall building is not less than 18m or 6 storeys measured from ground to the floor level of the uppermost storey. Heights in the definition should all be expressed in metres or number of storeys. Every area of the borough should be covered by a tall building definition. In addition, Figures 5.1 and 5.2 of the draft Plan only give an indication of suitability and sensitivity on a sliding scale, but they do not identify specific areas where tall buildings may be an appropriate form of development, as set out in London Plan Policy D9(B). These tall building locations should be clearly identifiable on maps to avoid future confusion over whether a particular site is within a tall building location or not.		tall building locations and building heights, informed by the Tall Buildings Study update.
Historic England	2	QD 04	Tall buildings: The first of these relates to policy QD4 Building Heights. We note the tall building study that underpins this policy as well as the methodology that has been used to identify the varying degrees of sensitivity across areas of the borough to tall building proposals. However, as drafted QD4.F contains no reference to the need to avoid adverse impacts on the historic environment. This is in contrast to QD4.B(e), which does require proposals to preserve or enhance the significance of affected heritage assets and their settings. To ensure consistency of approach, such a clause should be included in QD4.F.	Noted.	Local Plan amended to include new criterion heritage for tall building proposals.
Home Builders Federation	2	QD 04	**QD4 Building heights** Part A of the policy helpfully defines what constitutes a tall building in Lewisham. This is a structure that is 30 metres or more in height in Lewisham, except in the designated Thames Policy Area where they are defined as buildings 25 metres or more in height. The London Plan defines a tall building as at least 18 metres in height. Part E of the draft policy addresses the requirement of Policy D9 of the London Plan which requires the London boroughs to delineate locations appropriate for tall buildings. Figure 5.1 is helpful. Part D includes a double-definition of what is a tall building in Lewisham. Part D (b) of the policy states that a tall building is also one that is significantly taller than the prevailing height of buildings in the immediate and surrounding area. This could be quite limiting for new development and would inhibit the construction of slightly taller buildings, for example those of three to four stories, in areas with a more suburban character. This could include streets where traditional two storey homes tend to dominate. It would be more helpful if the Council delineated those areas where structures of 30 metres or more in height would be considered (as it has done), and sub-	Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on tall building locations and building heights, informed by the Tall Buildings Study update. Local Plan amended to include an indicative benchmark building height for when masterplans should be submitted with development proposals for tall buildings.

			category areas where structures of say of less than 18 metres would be entertained, subject to details. This could help increase the supply of housing, especially on smaller infill sites near the train stations on high streets and in town centres not yet included in figure 5.1. Part G requires that tall buildings are delivered through a masterplan process in order to ensure that they are appropriately located both within a site and wider locality, designed to a high quality and effectively managed. We question whether a master-plan should be required for all tall-buildings, especially those that fall within the definition of Part D (b). These could be fairly modest proposals, such as a scheme for nine dwellings arranged over four stories but in an area that is generally of two storey character. We recommend that the Council reconsiders this requirement for areas in sub-locations for taller buildings up to 18 metres as we have suggested.		
Lee Forum	2	QD 04	We consider the plan needs to assert that once approval is granted there can be no expectation of post planning consent to alter plans and water them down leading to a poorer public realm and higher heights. The issue of post approval changes is not mentioned anywhere in the Plan.	Noted. Where planning consent has been granted, variations to the consent will be considered having regard to the development plan policies, and through the planning approval process. This is notwithstanding Permitted Development rights. The introductory section of the draft Local Plan sets out how the plan will be used for planning decisions, in line with national planning policy and legislation.	No change.
Lee Forum	2	QD 04	2. There is no definition of what constitutes a tall and a taller building in different locations. Robert Jenrick required the London Plan to be changed in January 2021 such that Boroughs define this in their Local Plans and we request that this be done.	Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The Tall Buildings Study update and amendments to the draft Local Plan have taken into account outcomes of the London Plan examination and publication plan.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
Lee Forum	2	QD 04	• The London Plan states tall buildings are anything that is ‘substantially taller than their surroundings and causes a significant change to the skyline'. It also states that boroughs must consider things like local transport and infrastructure when deciding where it is appropriate for tall buildings. • Fig 5.1 shows that Lewisham has assessed its evidence on the suitability of Lee Green for tall buildings and determined that tall buildings are not appropriate in the Lee Forum area. • The online session publicly stated that in areas not meant for tall buildings, building would not be allowed more than 1 floor higher than the existing tallest building (NOT 1 – 2 floors higher than a prior planning application). • At the online consultation we were also told that height will be determined on a case by case basis taking account	Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The Tall Buildings Study update and amendments to the draft Local Plan have taken into account outcomes of the London Plan examination and publication plan.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.

			of the context of the site and its surroundings, particularly the height of surrounding buildings and local views We hope that the council will demonstrate its commitment to these principles. Please refer to East area comments later for a more detailed view with regard to the forthcoming development at Leegate. • The 2019 Lewisham Characterisation Study page112 states 4.4.99 The examples of tall residential buildings in Lewisham typically date from the 1960s. Whilst they vary in height and form they are typically between ten and fifteen storeys tall although exceptions which exceed this include the three towers on the Pepys Estate in the north of the borough. The height of these buildings is not in keeping with the surrounding scale and should not be used as a justification for taller buildings in the future. The draft local plan page 109 states '5.34 Proposals for taller buildings assessed against Policies QD4 (A) and (B) must demonstrate a clear understanding of the site context, including the historical pattern of development in a locality. The reference point for the prevailing height of buildings or structures will vary on a case-by-case basis, even within a neighbourhood or locality. Not all existing tall or taller buildings will be appropriate references for new development. For example, some tower blocks built in the 1960s and 1970s detract from the historical townscape features within a neighbourhood, and are today considered not to make a positive contribution to local character. Furthermore, the cumulative impact of taller buildings within a site or locality will be an important consideration'. We agree that the 1960s anomalous tall buildings are not a guide for existing local height in an area and that the Leybridge Estate should not be used as such guide.		
Lee Forum	2	QD 04 Section 06	We would like much stronger and specific wording included in the Local Plan around tall buildings and heritage assets. **This wording used by Hounslow in its Great Western Corridor Masterplan and Capacity Study is the kind of wording that should be used. Here are some quotes from that plan: '' 'Where the height differential between areas with different height approaches is more than two storeys, the abrupt change in height creates an imbalance and breaks the coherence of the urban fabric''. ''Higher development may feel domineering and undermine the integrity of buildings with lower height''. ''Generally heights should overcome strong height differentials through the stepping down of development at the interface with public realm''. ''Buildings may have one or two set-back storeys behind the main frontage. Due to their limited visibility from the street space set-back storeys have little impact on the perceived building height or enclosure of the street space''. ''The approach is to promote mid-rise buildings rather than very tall buildings, as**	Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.

			they will be better able to avoid or limit harm to heritage assets''. ''There will be occasions where a tall or bulky development of a certain scale is simply unacceptable due to the potentially destructive effects on the setting of heritage assets''. ''The higher a building, the greater will be its propensity for harm, fuelled by developer ambition rather than any genuine pressing economic, regenerative or environmental driver''. Another example of the kind of wording we would like to see included in Lewisham's Local Plan is from this Historic England Guidance: **''There will be some locations where the existing qualities of a place are so distinctive or sensitive that new tall buildings will cause harm regardless of the perceived quality of the design'' and that ''conservation area appraisals identify areas of increased sensitivity to tall buildings''**		
Lewisham Liberal Democrats	2	QD 04	5. The height of new buildings will need to be lower, not violate the overall nature of local environments and respect the views of existing residents. This is evidenced at Catford Green, where the application for 19 storeys was reduced to eight storeys after a public outcry. Since one assumes that requirements have more legal force than guidelines, limits to the number of new residential units and height restrictions, should be included under 'requirements' in site allocations.	Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. It is not considered necessary to include building height requirements in the site allocations, as Policy QD4 will set out parameters for buildings heights across the Borough. Policy QD4 will need to be read together with the site allocation policies.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
London Borough of Bromley	2	QD 04	Policy QD4 relates to tall buildings and sets out locations where tall buildings are acceptable in principle, along with criteria to assess proposals that come forward. Figure 5.1 shows the locations. The figure is confusing as there is no key to explain what the different shades of green mean. If they relate to suitable in-principle height ranges, this must be clearly stated.	Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on tall building locations and building heights, informed by the Tall Buildings Study update.
London Borough of Bromley	2	QD 04	There are three locations near the Borough boundary where tall buildings are suitable in-principle: Grove Park, Sydenham and Lower Sydenham. The criteria in the policy should allow for robust assessment of applications in these areas. However, we would welcome a specific reference to assessing impacts on adjacent Boroughs in the criteria for Parts B and F.	Noted.	Local Plan amended to include additional supporting text to provide clarity that development proposals must assess impacts both within and outside of Borough.

London Borough of Bromley	2	QD 04	We are concerned about the Lower Sydenham buffer which crosses the Borough boundary. While we presume this relates to a general buffer around the station and note that the policy does not indicate suitability of tall buildings in Bromley, we would request that the mapping be amended to include just the areas within Lewisham. This will avoid any potential confusion in future.	Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The Lower Sydenham buffer was indeed a buffer around the station and not intended to apply to Bromley. Figure 5.2 will be replaced by new Tall Building Suitability Zone Maps within Lewisham only.	Local Plan figure 5.2 deleted and replaced with new Tall Building Suitability Zone Maps.
London Borough of Southwark	2	QD 04	Southwark is supportive of the approach to Tall Buildings taken in the borough, as set out in policy QD4 Building heights. The areas on the boundary with Southwark as shown in 5.2 are mostly more sensitive (darker purples) and we wouldn't expect height there either. New Bermondsey is less sensitive, which is fine for tall buildings.	Support noted.	No change.
London Wildlife Trust	2	QD 04	We support in principle the policy, especially point F)d, although the Trust would prefer to see fewer tall buildings built in London, let alone Lewisham. The growing number of tall buildings is likely to cause accumulative impacts of shading, night-time light pollution and wind-tunnelling, especially if built in clusters (which appears to be the thrust of the policy). These adverse environmental impacts are still not adequately understood, although research suggests that clusters of tall buildings at night will disorientate migrating birds, and the shade cast during spring can disrupt invertebrate emergence, with a knock-on effect on birds. Tall buildings should avoid shading or casting lightspill on all SINCs, and we recommend that explicit reference to avoiding proximity to SINCs should be made, either in F)d, or supporting text (recognising the specific policy QD9). At present Figure 5.1 does not give confidence that this is the case.	Support noted. Both the London Plan and the draft Local Plan Policy QD4 set policies for the design of tall buildings, which include considerations for visual, functional, environmental and cumulative impacts. Draft Local Plan Policy GR3 sets out requirements for development proposals to ensure there is not adverse impact on SINCs and other biodiversity sites. It is acknowledged that a cross-reference to this policy could be beneficial.	Local Plan policy QD4 supporting text amended to provide additional details for considering impact on biodiversity.
NHS (HUDU)	2	QD 04	**QD4 Tall Buildings** We propose an additional Clause Fh to be included in line with Thrive LDN's zero target for suicides in London. *Fh Incorporate mitigation measures to help prevent suicide and accidental falls for example anti-climb methods, fences, barriers and rails, these will be well designed and should be integrated into the overall design of the building.* Public Health England's (PHE) paper Preventing suicides in public places provides further information.	Noted.	Local Plan amended with an additional criterion on safe design features.
on behalf of Sydenham Scheme LLP the owners of the Coventry Scaffold	2	QD 04	Policy QD4 addresses building heights and it appears from Figure 5.1 that the Site is within the area identified as suitable for Tall Buildings. Given the scale of the Figure confirmation of this is sought as it is considered the site should be within this designation.	Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on tall building locations and building heights, informed by the Tall Buildings Study update.

Royal Borough of Greenwich	2	QD 04	While we appreciate the depth and detail contained within the tall buildings policy QD4, some elements of the policy and its supporting information are ambiguous or confusing. The policy instructs readers to refer to figure 5.1 to determine whether a location is in principle appropriate for tall buildings. However, figure 5.1 includes different gradations of colour, making it unclear which areas are actually considered in principle appropriate for tall buildings. The supporting text also lacks guidance for interpreting the figure. Particularly concerning for the Royal Borough, is that Blackheath town centre is shaded more darkly than its surroundings, which would seem to imply that it is appropriate for tall buildings; however, Blackheath has a strong historic townscape, supported by several historic church steeples, which would be seriously undermined by tall development.	Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on tall building locations and building heights, informed by the Tall Buildings Study update.
Royal Borough of Greenwich	2	QD 04	Figure 5.2 shows the sensitivity of different areas to tall buildings, which is welcome. However, it is not clear how figures 5.1 and 5.2 are meant to be read together, as some areas are shown as suitable for tall buildings but also sensitive to tall buildings. Figure 5.1 should be amended to show only those locations that are definitely in principle suitable for tall buildings, and the supporting text should be clarified to explain that where an area is shown as suitable in figure 5.1, but sensitive in figure 5.2, area- or site-specific assessments are required prior to applications.	Noted. The tall buildings sensitivity map (Figure 5.2) has been derived through the application of a number of variables. The draft Local Plan proposes that the tall buildings locations suitability map (Figure 5.1) must be read together with the sensitivity map to inform the design-led approach –whilst tall buildings may be acceptable in certain locations, the height of development will need to respond to local character sensitivities. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on tall building locations and building heights, informed by the Tall Buildings Study update.
Royal Borough of Greenwich	2	QD 04	It would also be helpful to identify maximum building heights for each proposed cluster. For example, while Lewisham town centre has an existing cluster of tall buildings, there is a risk, if buildings significantly exceed existing heights, that the cluster may come to dominate views from Greenwich Park to the south. This is also relevant to Deptford, where excessively tall buildings could have an impact on the World Heritage Site.	Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. Draft Local Plan Policy QD5 addresses view management and will need to be read together with Policy QD4.	Local Plan amended with more detailed requirements on tall building locations and building heights, informed by the Tall Buildings Study update.
Sydenham Society	2	QD 04	**QD4 Building heights** The Sydenham Society is concerned about the cluster of tall and taller buildings in Lewisham and Deptford. We maintain that these have led to a loss of character in their respective areas and have been harmful to the public realm. We advocate residential layouts based on recognised street patterns rather than an urban model of towers and slabs with poorly characterised spaces between. As is stated at 5.30, p109 *Higher density can be delivered through a wide range of site layouts and building typologies, including mid-rise*	Noted. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan was informed by a Tall Buildings Study, which identified parts of Deptford and Lewisham as suitable for tall buildings. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.

			developments that are reminiscent of historic mansion blocks but with modern specifications…. And at 5.32 *However inappropriately located, poorly sited and designed tall and taller buildings can have detrimental impacts both on the immediate area and wider area. These impacts may include the blocking of established views and vistas or landmarks, harm to heritage assets and their setting, disturbance to the character and visual amenity of streetscapes and townscapes, and the introduction of adverse microclimate conditions such as wind tunnels. Poorly designed buildings can also adversely impact on community safety as well as the mental and physical health and wellbeing of the population.*	Buildings Study, which has informed the Regulation 19 document.	
Telegraph Hill Society	2	QD 04	Our objections to high-rise buildings more generally are set out our comments about the type of development required to meet Strategic Objectives B3 and B4 and G16-19 in paragraphs 63 to 66 above.	Objection noted. Responses to detailed representations set out elsewhere in this Consultation Statement.	No change.
Telegraph Hill Society	2	QD 04	We welcome **QD4.A** and **QD4.B** We do however not consider that the Hatcham Works site should fall within the areas considered in-principle for tall buildings, even if the principle of tall buildings is more generally accepted. The site is directly adjacent to the Hatcham Park Conservation Area and impacts on the Telegraph Hill Conservation Area and on the predominately Victorian high street. Tall buildings on this site would immediately contravene the proposed policy **QD4.A** in that they would not be appropriate in scale, taking into account the site's immediate and wider context, and also QD4.B in that they could not be sensitive to the surrounding area, would project excessively above the streetscape, would adversely impact on the surrounding area and would result in adverse impacts on the amenity of neighbouring properties.	Noted. The draft Local Plan was informed by a Tall Buildings Study, which identified parts of New Cross as suitable for tall buildings. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The draft Local Plan Part 2 section on Heritage requires development proposals to preserve or enhance the significance or heritage assets and their setting, including Conservation Areas, in line with the National Planning Policy Framework. However it is acknowledged that a cross-reference to heritage could benefit Policy QD4.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update. Local Plan policy QD4 amended with an addition criterion addressing impacts on heritage assets.
Telegraph Hill Society	2	QD 04	We do not consider that High PTAL is alone a suitable criterion for determining where high rise buildings should be located without taking into account the present actual capacity of the transport infrastructure to cope with the increased traffic that would be generated. Whilst we appreciate that capacity will change over time and that development plans are expected to address such issues, actual and projected transport capacity (and the capacity of other infrastructure to cope for increases in the local population) is a material consideration and **QD6** should reference this.	Noted. As set out in the Tall Buildings Study, PTAL levels are one of multiple factors which have been used to determine the suitability of locations for tall buildings. Draft Local Plan policy TR1 set out policies to ensure that planning applications assess impacts of the development on the transport network, and to demonstrate that any adverse impacts can be avoided or appropriately mitigated. The policy takes into account existing and planned future capacity on the public transport network. The approach is considered to be in line with the London Plan.	No change.
Telegraph Hill Society	2	QD 04	There is a clear conflict as regards the suitability for high rise buildings in this area and other policy considerations. This is no better evidenced than by a comparison between **Figure 5.2**	Noted. The methodology for assessing the suitability of location for tall buildings does not specifically take into account proximity to public open space. Whilst the Local Plan recognises that access to public open space is integral	No change.

			(Suitability for high rise buildings) and **Figure 10.4** (Open space deficiency). (*The figures reproduced on following page.*)	part of sustainable and liveable neighbourhoods, it is considered that presence of an area of open space deficiency should not preclude the development of tall buildings within it. The Part 2 draft Local Plan policies on Green Infrastructure seek to ensure that people have access to high quality open space. Deficiencies in access to open space can be addressed in a variety of ways. For example, new development can enable the delivery of new or improved routes or entrances to existing open spaces, investment to support improved quality of open space provision, and direct delivery of new open space on site. Where development proposals for tall buildings come forward, these will need to be considered alongside other Local Plan policies. Where the Local Plan has identified that a site/area is suitable for a tall building, this does not mean that all proposals for tall buildings within that area will be acceptable.	
Telegraph Hill Society	2	QD 04	An area which has a significant deficit of open space and is recorded as the most unhealthy in South East London (paragraph 27 above) can hardly be said to be *"suitable"* for tall buildings with the inherent presumption of more people per hectare.	Noted. The methodology for assessing the suitability of location for tall buildings does not specifically take into account proximity to public open space. Whilst the Local Plan recognises that access to public open space is integral part of sustainable and liveable neighbourhoods, it is considered that presence of an area of open space deficiency should not preclude the development of tall buildings within it. The Part 2 draft Local Plan policies on Green Infrastructure seek to ensure that people have access to high quality open space. Deficiencies in access to open space can be addressed in a variety of ways. For example, new development can enable the delivery of new or improved routes or entrances to existing open spaces, investment to support improved quality of open space provision, and direct delivery of new open space on site. Where development proposals for tall buildings come forward, these will need to be considered alongside other Local Plan policies. Where the Local Plan has identified that a site/area is suitable for a tall building, this does not mean that all proposals for tall buildings within that area will be acceptable.	No change.
Telegraph Hill Society	2	QD 04	With regards to the proposed Hatcham Works site, there is an inherent conflict in the proposed Plan between the site, which is identified in **QD4.E,** and the policies in **QD4.A** and **QD4.B**. **QD4.A** requires any building's scale to be appropriate, taking into account the wider context, and **QD4.B** requires any building to preserve or enhance the significance of heritage assets. Unless the policy is meant to be read that "taller"	Noted. The draft Local Plan was informed by a Tall Buildings Study, which identified parts of New Cross as suitable for tall buildings. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall	Local Plan amended with more detailed requirements on buildings heights, informed by the

			buildings are not “tall buildings” it is impossible to reconcile the in-principle acceptability of a tall building on the Hatcham Works site with wording of **QD4.A** and **QD4.B**. The illustrations below from the proposed development by Sainsbury’s/Mount Anvil (2019-2020) show the impact that such development would have had on the Hatcham Conservation Area and the Telegraph Hill Conservation Area. Whilst that development application was withdrawn, the requirements set out for the site in Part Three of the Plan would suggest at least one tower of comparable height.	Buildings Study, which has informed the Regulation 19 document. The draft Local Plan Part 2 section on Heritage requires development proposals to preserve or enhance the significance or heritage assets and their setting, including Conservation Areas, in line with the National Planning Policy Framework. However it is acknowledged that a cross-reference to heritage could benefit Policy QD4.	Tall Buildings Study update. Local Plan policy QD4 amended with an addition criterion addressing impacts on heritage assets.
Telegraph Hill Society	2	QD 04	We do not understand why Hatcham Conservation Area and the north-east quarter of the Telegraph Hill Conservation Area are included within the area of “Tall Building suitability” in figure 5.1 according to the colouring on the lower scale on page 111 of the Plan. The areas are clearly not suitable for tall buildings which would be contrary to Policy HE2.B. The figure is confusing as it uses the same colours for high PTAL (see our comments on that at paragraph 88 above) as it does for the most suitable for tall buildings. The Conservation Areas should be scoped out of inclusion on figure 5.1.	Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
Telegraph Hill Society	2	QD 04	The Tall Buildings sensitivity plan in **figure 5.2** is clearly incorrect. Hatcham Conservation Area and the north-east quarter of the Telegraph Hill Conservation Area are shown as less sensitive to tall buildings than the remainder of the Telegraph Hill Conservation Area. Those two areas though are ones from which any tall building at Hatcham Works would most visible (see the above pictures in paragraph 91 which dramatically illustrate this). Hatcham Conservation Area and the north-east quarter of the Telegraph Hill Conservation Area should be shown in the darkest purple whilst the remainder of the Telegraph Hill Conservation Area could be downgraded slightly as such towers would be less visible from those streets.	Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
Telegraph Hill Society	2	QD 04	We accept that there is a separate consideration given to sensitivity in **figure 5.2** but we do not believe there should be an “in-principle support” for high rise development which would significantly detract from the built environment and appearance of the Borough’s Conservation Areas. We would propose therefore that sites where development of high-rise buildings would affect adjacent Conservation Areas (by reference to **figure 5.2** and sight lines) should be excluded from potential tall building development on **figure 5.1** as being unsuitable for tall buildings.	The impact of any tall buildings proposed adjacent to conservation areas will be assessed through the development management process in accordance with all relevant policies including those on heritage assets	No change.
Telegraph Hill Society	2	QD 04	We would further note that the height of the buildings proposed in the Sainsbury’s/Mount Anvil proposals were one of the major causes of objection from residents. Our survey showed that 89% of respondents were against the overall proposals (77% strongly against) with the majority of respondents (57%) believing that any development should not exceed 6 storeys with 84% not wishing developments in excess of 10 storeys. Whilst we accept that the Sainsbury’s Mount / Anvil proposals were withdrawn and included a higher density	The indicative capacity of the former Hatcham Works site reflects the massing and detailed masterplanning done through the New Cross Gate area Framework. The site is a highly accessible site and suitable for high-density development.	No change.

			than that set out in section 15 of this Plan for the Hatcham Works site (**page 603**), the proposed 912 net residential units will still require extremely tall towers well beyond those felt suitable for the site by residents living in the surrounding area and affected by any development on the site. The full survey results are given in Appendix 2 to this paper.		
Telegraph Hill Society	2	QD 04	In summary: By making such substantial changes to the local area, it arguably will also not reinforce community cohesion or integration and would also be contrary to Strategic Objectives B3 and G18. • High PTAL alone is not a justification for tall buildings on any site • High-rise developments generally do not meet **Strategic Objectives B3, B4 or G16 to G18** • Significantly increasing the population of the area is ethically unacceptable until the issues of health and well- being are resolved • There is insufficient green space to support a significant increase in residential capacity in an area which is deficient in such space • The plan (**figure 5.2**) is misleading as to tall building sensitivity requirements as the area is extremely sensitive to such buildings and • The heritage of the surrounding Conservation Areas would be irretrievably damaged by the creation of such towers as the illustrations above clearly show. The allocation of the Hatcham Works site for tall towers is contrary to **Strategic Objectives A1, D8, F13, F15 and G16.** By making such substantial changes to the local area, it arguably will also not reinforce community cohesion or integration and would also be contrary to **Strategic Objectives B4 and G18.**	We appreciate that the level of growth within some areas of the borough will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The spatial strategy for the borough focuses this growth in Opportunity areas and town centres that have good access to public transport, jobs and local services. We consider this a sensible and sustainable approach to meeting this challenge. Proposals for development will be assessed through the development management process against the relevant policies including those on Heritage. We do not consider that high-density development in sustainable locations contradicts the strategic objectives.	No change.
Telegraph Hill Society	2	QD 04	For all the reasons given above we do not believe that the Hatcham Works site is suitable for tall buildings and believe it should be scoped out of **figure 5.1**. The indicative development capacity in the site allocation on **page 603** would need to be reduced accordingly	The indicative capacity of the former Hatcham Works site reflects the massing and detailed masterplanning done through the New Cross Gate area Framework. The site is a highly accessible site and suitable for high-density development.	No change
Telegraph Hill Society	2	QD 04	For other reasons (not related to height) as to why the Hatcham Works site could be better used to improve the lives of residents and to meet the Borough's vision of a welcoming series of communities, see our proposals on the use of the site as retail (paragraphs 169 to 171) and creative employment (paragraph 157), together with low-rise accommodation and a park (paragraph 48). These move the current designation of High Street into a more pedestrian and cycle-friendly area than the A2 will ever be and address the lack of green space and	The indicative capacity of the former Hatcham Works site reflects the massing and detailed masterplanning done through the New Cross Gate area Framework. The site is a highly accessible site and suitable for high-density development.	No change.

			health issues identified, but not resolved by, the proposed Lewisham Plan.		
Telegraph Hill Society	2	QD 04	For other comments on the Hatcham Works site allocation please see our comments in paragraphs 245 to 254.	Noted	No change.
Telegraph Hill Society	2	QD 04	**QD4.B.a** uses the words "*exceptional design and architectural quality*" which are basically unclear. Something can be exceptional by virtue of being exceptionally bad or exceptionally different. We would suggest the paragraph should read "*are of an exceptionally good design and architectural quality*" which, whilst leaving it still open to the subjective interpretation of "good" does clarify what is, we assume, intended.	Noted.	Text amended as suggested.
Telegraph Hill Society	2	QD 04	**Q4.F** "Tall buildings will only be considered acceptable in-principle in the locations identified in **figure 5.1** as being appropriate for tall buildings." However **figure 5.1** does not identify locations as being "appropriate", it has a scale of "suitability". There is no guidance as to how a scale of suitability might be used to define what is appropriate: something can quite suitable but totally inappropriate.	Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
Telegraph Hill Society	2	QD 04	**§ 5.37** states that proposals will be "strongly resisted where they would result in unacceptable visual, functional, environmental and cumulative impacts that cannot be avoided or appropriately mitigated." We do not understand how unacceptable features can be mitigated – the design of the buildings should be such as to avoid them entirely. "Mitigation" gives a loophole for argument which should not be permitted. The sentence should read simply: "proposals will be strongly resisted where they would result in unacceptable visual, functional, environmental and cumulative impacts."	Agreed. The policy supporting text will be amended for clarification.	QD4 policy supporting text amended to make clear that development proposals which have an unacceptable impact will be refused.
The Hatcham Society	2 3	QD 04 LNA SA 09	What we don't welcome 33. We do not approve of the planned "indicative development capacity" of 912 residential units which has increased by 712 from the indicative housing capacity from Lewisham's Site Allocation Plan of 2013. This will require tall towers. We do not believe Hatcham Works site should fall within the areas considered for tall buildings, even if the principle of tall buildings is more generally accepted. The site is directly adjacent to the Hatcham Conservation Area and will impact on the Telegraph Hill Conservation Area and the predominantly Victorian high street. Tall buildings on this site would immediately contravene the proposed policy QD4.A in that they would not be appropriate in scale, taking into account the site's immediate and wider context, and also QD4.B in that they could not be sensitive to the surrounding area. We do not consider that High Public transport accessibility level is a suitable criterion for determining where high rise buildings should be located. Once the Bakerloo Line reaches us	The indicative capacity of the former Hatcham Works site reflects the massing and detailed master planning completed through the New Cross Area Framework and Station Opportunity Study. The site is a highly accessible site and suitable for high-density development.	No change.

			in New Cross Gate, Hatcham Works will witness incredibly high levels of footfall with a supermarket, a 'district centre', an Underground Station interchange, a Network rail and Overground station. We cannot find successful examples of such a high volume of housing coupled with a similar busy interchange in London. It would be heavily misguided to place so many homes in such an intensely concentrated area of public transport. The only people who might want to live in such a place are students who are already over-accommodated for in the borough. While the London Plan (2021) encourages higher density developments in areas with good connectivity, we do not believe that the London Plan is saying that sites which offer good connectivity can also accommodate high density developments on the same site. There has not been enough research undertaken to determine if areas with a high concentration of public transport links are suitable for high density developments. We would prefer the site to feature a new green space as the surrounding area is deficient of open space and is recorded as the most unhealthy in South East London, according to Lewisham's own draft Plan. Until the success or failures of the high rises by Lewisham station is surveyed and understood by speaking to residents there, Lewisham council should not allow further high rises in its borough.		
The St John's Society	2	QD 04	How should/can tall buildings make a 'positive contribution' to the skyline? This needs to be qualified with clear criteria to assess this.	This is consistent with London Plan and will be assessed through the development management process	No change.
TIDE CONSTRUCTION LTD	2	QD 04	**Policy QD4 – Building Heights** *Part E (Tall Buildings)* Draft Policy QD4 seeks to define the locations within the Borough where tall buildings will be acceptable. The Policy states at Part E that tall buildings will only be considered acceptable in-principle in the locations identified in Figure 5.1. However, the Tall Buildings Suitability Plan at Figure 5.1 (on page 110 of the document) is poor quality and is not sufficiently detailed to show where tall buildings will be accepted. The key to the plan included on page 111 makes it difficult to interpret which shade of green relates to the shaded areas on the Tall Buildings Suitability Plan, as required by Policy D9 of the London Plan 2021 (adopted March 2021).The Tall Buildings Sensitivity Plan (Figure 5.2, page 112 of the document) is also illegible, and does not enable accurate consideration of less sensitive and more sensitive locations within the Borough. *Part F (Tall Buildings)* The draft policy wording refers to tall buildings being appropriately located in line with Part D of the policy. However, we suggest that this should refer to Part E, which defines the locations where tall buildings will be considered	Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The Tall Buildings Study update and amendments to the draft Local Plan have taken into account outcomes of the London Plan examination and publication plan.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.

			acceptable in-principle (the locations identified in Figure 5.1 as being appropriate for tall buildings).The draft policy wording at Part F also refers to the draft London Plan Policy D8 (Tall Buildings), which is now Policy D9 in The London Plan 2021 (adopted in March 2021). This should be amended. We also suggest that the following wording is added to Part E of the draft policy: E Tall buildings will only be considered acceptable in-principle in the locations identified in Figure 5.1 as being appropriate for tall buildings, or in other locations which are considered to be acceptable for tall buildings.		
	2	QD 04	We may be out of date but we are old enough to have witnessed the developments post war and observed the gallop towards high rise, even demolishing old housing stock in the process. This of course, was followed by the acknowledgement of the fact that village life needs to be linear not vertical and many tower blocks were demolished to be replaced by a range of lower lying accommodation. The estates between Peckham and the Elephant and Castle being an example and much of the inner part of London has been through these phases since 1946.	Noted. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. With respect to tall buildings, the proposals in the draft Local Plan help give effect to the London Plan.	No change.
Telegraph Hill Society	2	QD 04	The considerations in the remainder of this section follow from our comments above on Parts One to Three of the draft Plan and are consistent therewith. They should not be taken to mean that the proposed indicative development of capacity of 912, which would require tall buildings, can ever be made acceptable but should be taken as applicable to any scale development acceptable on the site.	Noted. Detailed comments to other representations set out elsewhere in this Consultation Statement. The indicative development capacity for the former Hatcham Works site allocation was established through a detailed design appraisal, as set out in the New Cross Area Framework and Station Opportunity Study.	No change.
Blackheath Society	2	QD 05	The Blackheath Society made a lengthy and detailed response to the consultation on the draft Local Plan. We know you also had a lot of comments from other amenity societies, and hopefully from individual residents. We assume you are now collating those and considering how to report and respond. One strand of our comments related to views of/from Blackheath i.e. of the Heath itself and the Village and residential area next to it. The relevant comments are below. The crux of the matter is that no views were listed for protection, despite being identified on the map in the draft Local Plan. I thought it might be helpful to remind you of the work we did back in 2018 and 2019 in relation to the Characterisation Study commissioned by LBL. This involved our own assessment, in text and photos, of the character of our area and creation of a photo record, which we submitted to LBL for use in the Study. I am attaching two files of photos, labelled and tagged with location co-ordinates, which may be helpful in identifying suitable views for protection. Since 2018/19, we have carried out more photographic survey work, especially during the early stages of the pandemic when there were clear, unpolluted skies, fewer people and cars, and	At present the council is not proposing to include additional views beyond those included in the Regulation 18 draft Local Plan, which were informed by the Lewisham Characterisation Study. There will be opportunities to identify and designate additional views through a future review of the local plan.	No change.

			therefore many opportunities for good pictures. We now have many more views we could share if needed.		
Blackheath Society	2	QD 05	Need to protect more local views, especially in/of/from Blackheath. See also next comment on Fig 5.3.	At present the council is not proposing to include additional views beyond those included in the Regulation 18 draft Local Plan, which were informed by the Lewisham Characterisation Study. There will be opportunities to identify and designate additional views through a future review of the local plan.	No change.
Blackheath Society	2	QD 05	Various Lewisham local views of/from Blackheath are marked on Fig 5.3 but none of these seem to be described/ noted in the text or included in Schedule 1 listing local views. Many of these views are already being degraded by recent or consented schemes in Lewisham town centre (and by RBG's Kidbrooke) and are in need of greater protection before they are completely and irremediably ruined.	At present the council is not proposing to include additional views beyond those included in the Regulation 18 draft Local Plan, which were informed by the Lewisham Characterisation Study. There will be opportunities to identify and designate additional views through a future review of the local plan.	No change.
Blackheath Society no 2	2	QD 05	**QD5 View management**. Need to protect more local views, especially in/of/from Blackheath. See also next comment on Fig 5.3.	At present the council is not proposing to include additional views beyond those included in the Regulation 18 draft Local Plan, which were informed by the Lewisham Characterisation Study. There will be opportunities to identify and designate additional views through a future review of the local plan.	No change.
Blackheath Society no 2	2	QD 05	**QD5**. Various Lewisham local views of/from Blackheath are marked on Fig 5.3 but none of these seem to be described/ noted in the text or included in Schedule 1 listing local views. Many of these views are already being degraded by recent or consented schemes in Lewisham town centre (and by RBG's Kidbrooke) and are in need of greater protection before they are completely and irremediably ruined.	At present the council is not proposing to include additional views beyond those included in the Regulation 18 draft Local Plan, which were informed by the Lewisham Characterisation Study. There will be opportunities to identify and designate additional views through a future review of the local plan.	No change.
Brockley Society	2	QD 05 Figure 5.3	P114 fig 5.3: This diagram is difficult to understand, but it looks like the views from Hilly Fields back towards London Bridge or down towards the other two of the "Three Peaks" are not recognised as strategic views (and conversely that the ever-deteriorating view towards Lewisham centre is recognised), which seems bizarre.	At present the council is not proposing to include additional views beyond those included in the Regulation 18 draft Local Plan, which were informed by the Lewisham Characterisation Study. There will be opportunities to identify and designate additional views through a future review of the local plan.	No change.
London Borough of Southwark	2	QD 05	Southwark is supportive of approach to the protection of views as set out in policy QD5 View management.	Support noted.	No change.
Sydenham Society	2	QD 05	**QD5 View management (p115)** A significant omission is any reference to strategic views towards and away from Sydenham Hill Ridge – the second highest point in London. The wooded aspect of Sydenham Hill Ridge can be glimpsed from many points in London, giving a view which harks back to the era of the Great North Wood. Views of this unique local asset are profoundly significant and should be afforded the status of 'Strategic' within the Plan and its setting designated a 'Protected Vista'. Such a designation would necessitate the following action (p117)	At present the council is not proposing to include additional views beyond those included in the Regulation 18 draft Local Plan, which were informed by the Lewisham Characterisation Study. There will be opportunities to identify and designate additional views through a future review of the local plan.	No change.

			5.45 The MHCLG Chief Planning Officer's letter (March 2017) placed a new requirement on Boroughs to consult the Mayor where buildings are proposed in an area which may affect a Protected Vista, and where they are beyond the areas currently designated as Wider Consultation Area in the London View Management Framework SPG. Proposals sited in the background of a Protected Vista must pay attention to the impact of the development on the view so that it does not harm the setting of the Protected Vistas, whether the proposal falls inside the wider setting consultation area of a protected vista or not.		
Telegraph Hill Society	2	QD 05	We commented on inaccuracies in **figure 5.3** when it was first produced and note that those inaccuracies still remain uncorrected. It is not clear, as there is no explanation of the legend, what the different thickness in view lines and shading mean. Moreover, the major views from Telegraph Hill are simply wrong. There is a significant Westward view incorporating the whole of Peckham and around towards the southwest with Denmark Hill being clearly visible. The views need to be properly recorded in this figure.	At present the council is not proposing to include additional views beyond those included in the Regulation 18 draft Local Plan, which were informed by the Lewisham Characterisation Study. There will be opportunities to identify and designate additional views through a future review of the local plan.	No change.
Telegraph Hill Society	2	QD 05	We have previously requested that the Council include an expression of intent in their Plan to seek a London Strategic View protection from Telegraph Hill as the views are as good as, say, those from Greenwich and also have historical interest as the site of the early 19th Century optical Telegraph. We repeat that request here.	At present the council is not proposing to include additional views beyond those included in the Regulation 18 draft Local Plan, which were informed by the Lewisham Characterisation Study. There will be opportunities to identify and designate additional views through a future review of the local plan.	No change.
Blackheath Society no 2	2	QD 06	**QD6 Optimising site capacity.** Site capacity/density should indeed be 'appropriate to the *local* context and deliver high quality housing to meet *local* needs, particularly *genuinely affordable* housing.' (5.52) – *our italics*. However, this has not always been the case e.g. for the many developments approved in recent years in Lewisham town centre. The use of 'prevailing' form (low/medium rise) was ignored at the outset, and the use of 'emerging' form was used to make recent precedents of approval for each new tall tower (often with very little genuinely affordable housing) justify the next one in close proximity being even taller, and this even before it predecessors and necessary new/upgraded infrastructure had been completed and evaluated.	Noted. The Local Plan will be used in the consideration of future planning applications. Decisions on previous planning applications are outside the scope of the Local Plan.	No change.
Historic England	2	QD 06	QD6 Optimising site capacity: We welcome the concept of 'optimising' site capacity given that this will allow for a fully rounded consideration of any potential impacts of development. However, we would suggest that the policy should go further and include an explicit reference to the historic environment within clause bii.	Noted.	Local Plan amended as suggested.
NHS (HUDU)	2	QD 06	**QD6 Optimising Site Capacity** We broadly support this policy, however, while the policy refers to having regard to existing and planned infrastructure, it should explicitly reference developments contributing to the provision of infrastructure serving the new population. Partners such as the NHS may identify the need for additional	Support noted. The draft Local Plan Part 2 policy CI1 Community infrastructure and Part 4 policy DM2 Infrastructure funding and planning obligations address the need for development proposals to assess and contribute to infrastructure required to support new development.	No change.

			infrastructure based on the growth set out in the Local Plan and include in forward plans, however, this does not mean the funding for their development is available. There should be a clear policy requirement in line with the NPPF and PPG that developers will mitigate the impact of their development through S106 agreements. Our priority is health infrastructure; sadly the current pandemic has highlighted demands across all types of health infrastructure including acute and mental health. Para 5.51 ….'Planning contributions may be used to ensure that new development is appropriately supported by infrastructure, including community infrastructure in line Policy CI (Safeguarding and securing community infrastructure)'. This sentence should be strengthened to say that planning contributions '*will be required* 'rather than 'may be used' and as incorporated at policy level.	Planning obligations and S106 contributions are only required to make a development acceptable in planning terms. They may not always be needed as development proposals may suitably address the policy requirements without the need for such legal agreements.	
The Hatcham Society	2	QD 06 Page 122	There is no clear vision in the Plan of an ideal private development which provides a high proportion of genuinely affordable homes. We were disheartened to see on Page 122 of the Plan a photograph of the Lendlease/Timberyard (also known as Deptford Landings) development in Deptford which has now ground to a halt despite just 10% of the flats being classed as "affordable" The existing residents in the Pepys estate are now forced to live next to a permanent construction site. *LB Lewisham officer note: Appendix 1 showing the photograph of the Timberyard site from page 122 of the Plan is included in the original representation.* If this is the kind of development being championed by the Plan, we do not believe Lewisham council's aspirations are high enough.	Noted. The Local Plan sets out criteria based policies used to assess planning applications. It is not the role of the Local Plan to specify or illustrate what might be an acceptable development according to the policy parameters. This will be considered on a case-by-case basis through the planning approvals process. The photos included in the draft Local Plan are provided for illustrative purposes only and do not carry material weight for planning decisions. As the plan is progressed through the next stages of the process, the Council may take the opportunity to update these, subject to resources available.	No change.
	2	QD 07	2) Section QD7 re Amenity Can we include a requirement for much better quality Construction Management Plans, which include dealing with interests of neighbours and the need to communicate with them?	Noted.	Local Plan policy on amenity amended to include additional criteria for considerate construction, including submission of construction method and management plans for major development, and where appropriate

					basement development and other development likely to significantly impact on local amenity.
Blackheath Society no 2	2	QD 07	**QD7: Amenity and agent of change**. Protection and enhancement of local amenity is very important. It is rather underplayed and often neglected in planning decisions. The 'Agent of change' concept is poorly explained, especially in QD7 C.	Noted. The supporting text includes information on the Agent of Change principle. However this will be amended for further clarification. The principle is also explained in the London Plan.	Local Plan supporting text amended to better clarify Agent of Change principle.
London Wildlife Trust	2	QD 07	We support the policy, and welcome the points made in supporting para 5.61.	Support noted.	No change.
NHS (HUDU)	2	QD 07	**QD7 Amenity and Agent of Change** Clause Ba refers to privacy of occupiers and those within neighbouring properties, however, this is not made explicit for other clauses which should be amended, for example, clauses Bb and Bc should relate to both future occupiers of the scheme and those within neighbouring properties.	Noted.	Local Plan amended as suggested.
Port of London Authority	2	QD 07	**2. Policy QD7: Amenity and Agent of Change.** In principle support the policy, which states that development proposals must demonstrate how they will protect and wherever possible enhance the amenity of existing and future occupiers and uses, as well as the amenity of neighbouring properties and uses, and that the Agent of Change principle will be applied in accordance with the draft London Plan. In order to make the policy stronger, the supporting text in paragraph 5.60 must be expanded to specifically include reference that noise generating uses includes industrial areas and safeguarded wharves, and that noise sensitive uses located in close proximity to such sites (including vacant wharves) must be designed to minimise the potential for conflicts of use and disturbance, in line with policies D12 (Agent of Change) and SI15 (Water Transport) of the adopted London Plan, and paragraph 182 of the National Planning Policy Framework (NPPF).	Noted.	Local Plan supporting text amended as suggested. New policy criterion included in LNA4 (Thames Policy Area and Deptford Creekside) linking to Agent of Change, along with additional supporting text.
Telegraph Hill Society	2	QD 07	Large developments have a wide impact on the surrounding area. We are concerned that **QD7.A** is not drafted sufficiently widely in its wording *"…. as well as the amenity of neighbouring properties and uses*" to take this into account. In development terminology "neighbouring properties" only relates to those immediately bordering the development site and quite clearly the effect on local residents of a large development is more than that. We would propose that "*neighbouring properties*" be replaced by "*properties likely to be affected by the proposed development*".	Noted. The Local Plan will be amended to require development proposals to demonstrate that amenity impacts will be mitigated and managed. The plan will remove specific reference to neighbouring properties in the policies, in order to ensure consideration of the wider local area and all properties likely to be affected.	Local Plan amended as suggested.

Telegraph Hill Society	2	QD 07	Similar issues arise with regards to the wording of **QD7.B** and should be addressed in the same way.	Noted.	Local Plan amended as suggested.
Theatres Trust	2	QD 07	Policy QD7: Amenity and Agent of Change The Trust welcomes this policy which leans on the strong content of the London Plan and in turn paragraph 182 of the NPPF (2019). In areas of high development pressure such as Lewisham venues will be particularly vulnerable to being undermined by insensitive or incompatible developments. Therefore it is essential that the borough's facilities are suitably protected.	Support noted.	No change.
Blackheath Society no 2	2	QD 08	**QD8 Noise and vibration and QD9 External lighting.** These policies are welcomed. NB: On pages 234 & 235, there are references to QD8 (Residential design & density), which does not seem to exist.	Support noted. The reference to QD8 is erroneous and will be amended.	Supported text amended to remove the references to QD8 (Residential design and density).
London Wildlife Trust	2	QD 08	We support the policy.	Supported noted.	No change.
Port of London Authority	2	QD 08	**3. Policy QD8: Noise and Vibration.** In principle support policy, which states that new noise sensitive development should be located away from existing or planned sources of noise pollution. In order to make the policy stronger it is considered that specific reference is made to safeguarded wharves within supporting paragraph 5.64 as a use, alongside 3 railways, roads and commercial activities that new sensitive development (such as housing and community infrastructure) must take into consideration, in line with London Plan policy.	Noted.	Local Plan supporting text amended as suggested. New policy criterion included in LNA4 (Thames Policy Area and Deptford Creekside) linking to Agent of Change, along with additional supporting text.
London Wildlife Trust	2	QD 09	We welcome and support this policy.	Support noted.	No change.
Port of London Authority	2	QD 09	**4. Policy QD9: External Lighting.** Support policy, which states that development proposals should avoid adverse impacts of light pollution at all stages of the development, and are designed and operated to minimise and control the level of illumination, glare, angle and spillage of light, particularly to protect sensitive receptors such as residential properties and natural habitats, and the specific reference to water habitats in supporting paragraph 5.70. To note development adjacent to the tidal Thames external lighting must also be designed to ensure there are negative effects on navigation in addition to river ecology.	Noted.	Local Plan amended as suggested, to include additional criterion to consider impacts on Thames river navigation.
Telegraph Hill Society	2	QD 09	**§ 5.68** notes that "If not appropriately managed however, artificial lighting has the potential to become light pollution which can present physiological, ecological and other environmental issues. There are three main types of light	Noted.	No change.

			pollution: … light intrusion or trespass (the spilling of light beyond the boundary of the property or area being lit). All such pollution results in excessive or obtrusive light that may cause nuisance to the population, adversely impact on the amenity of properties and harms habitats and biodiversity".		
Telegraph Hill Society	2	QD 09	Whilst we support the policy, the harms so described also apply to internal lighting spillage such as that skylights and windows, in particular large bifold windows where they are poorly placed without consideration for neighbouring properties. We also hear considerable complaints from occupiers of first and second floor flats in this regard where a ground floor development has been allowed incorporating skylights.	Noted.	Draft Local Plan amended to expand scope of policy, so that it addresses the amenity impacts of 'artificial lighting' rather than external lighting.
Telegraph Hill Society	2	QD 09	We are also aware of areas which have been adversely affected by new developments, particularly non-residential buildings, where the large expanses of glass windows, illuminated at night, have led to an unacceptable change in the views from surrounding areas with the physiological impact referred to in **§ 5.68**.	Noted.	Draft Local Plan amended to expand scope of policy, so that it addresses the amenity impacts of 'artificial lighting' rather than external lighting.
Telegraph Hill Society	2	QD 09	We consider, therefore, that policy **QD9** should be widened to cover all forms of light pollution and not just that from external lighting.	Noted.	Draft Local Plan amended to expand scope of policy, so that it addresses the amenity impacts of 'artificial lighting' rather than external lighting.
Blackheath Society no 2	2	QD 10	Need for more on robust Construction Management Plans to reduce nuisance during construction of many new major developments, often close to each other and to existing residential areas, but also for some smaller schemes. Only two minor references to such plans in whole document, under QD10 and SD6, and neither included in the main policy, only in the Explanation.	Noted.	Local Plan policy on amenity amended to include additional criteria for considerate construction, including submission of construction method and management plans for major development, and where

					appropriate basement development and other development likely to significantly impact on local amenity.
Blackheath Society no 2	2	QD 10	**QD10 Building alterations, extensions and basement development**. This is most welcome, especially for Conservation Areas, as was the SPD approved in 2019.	Support noted.	No change.
Blackheath Society no 2	2	QD 10	**QD10.** Reference to construction management plans in para 5.78 is not reflected in body of policy QD10, and appropriate nature/scale to warrant them not defined. Harmful impacts on amenity should be avoided or minimised for all construction projects, from small building alterations, extensions and basement developments up to major developments, especially if they are likely to last a significant time.	Noted.	Local Plan policy on amenity amended to include additional criteria for considerate construction, including submission of construction method and management plans for major development, and where appropriate basement development and other development likely to significantly impact on local amenity.
Brockley Society	2	QD 10	P133 para E: We considered requesting a specific prohibition on basement development in conservation areas, unless subparagraph (a) does the job.	Noted. Blanket restrictions on basement developments in Conservation Area are not considered to be consistent with National Planning Policy Framework. Consideration for the significance of heritage assets is captured in draft Local Plan Policy QD10.E.a, which requires that basement development proposals do not adversely impact on historical character. The policy will also be taken together with the Conservation Area policies in Part 2 Heritage section of the Local Plan.	No change.
Telegraph Hill Society	2	QD 10	We refer to our general comment in paragraphs 67 - 70 over the use of the word *"support"*. This is a particular instance, given the number of badly designed extensions that appear to	Noted. The draft policy QD10 makes clear provisions for 'only supported'. The supporting text will assist with implementation of the policy. Planning decisions on	Policy criterion for contemporary designs

			be permitted under the SDG, where the use of the phrase *"only support"* is absolutely required.	previous applications are outside the scope of the Local Plan.	amended as suggested, to better align with remainder of policy.
Telegraph Hill Society	2	QD 10	It is extremely unfortunate that the illustration given in the draft Plan does not show a good example. The windows in the extension clearly do not respect the originals (modern possibly uPVC frame on the first floor far too wide for the window and a large plate glass window on the ground floor – whereas the original property, as can be seen, has smaller paned sash windows). This should not be used as an example for fear of setting a precedent. We would strongly urge you to find a better example and would be happy to provide you with some.	Noted. The photos included in the draft Local Plan are provided for illustrative purposes only and do not carry material weight for planning decisions. As the plan is progressed through the next stages of the process, the Council may take the opportunity to update these, subject to resources available.	No change.
Telegraph Hill Society	2	QD 10	We note that much of the material previously in DM Policy 31 is now reflected in the SPG, although we consider that the SPG is too widely drawn, allows for some inappropriate development particularly within Conservation Areas and is urgently in need of further refinement.	Noted. The Supplementary Planning Document is outside the scope of the Local Plan. The Council may in the future review and update SPDs to ensure guidance appropriate aligns with adopted Local Plan policies.	No change.
Telegraph Hill Society	2	QD 10	We welcome the addition of new material on basement development and lightwells which have become a particular source of contention since the last UDP was introduced. • There are, however, certain elements of DM Policy 31 which we consider still need to be reflected within this section of the Plan as follows: • Development proposals should response *sensitively* to the character rather than *positively* (**QD10.B**). • The express statement that "*Roof extensions on the street frontage of a building, particularly in a residential street will be resisted in favour of extensions to the rear of the building*" made in DM 31.2b should be retained. • The requirement that any proposal should retain 50% of the garden space (included in DM Policy 31.2c) is not expressly repeated in the SPD and should therefore be included in **QD10**. • The requirements in DM 31.2d are not expressly repeated in the SPD and should therefore be included in **QD10**: "*additional or enlarged windows, doors and other openings, should be in keeping with the original pattern, and in the case of a roof extension should reflect the existing alignment of the windows. Replacement windows where controllable by the Council should closely match the pattern of the original windows. The repair of original windows will be encouraged*."	Noted. Some of the suggested changes are considered to be appropriately captured by the draft Local Plan policies. However it is acknowledged that principles of the extant DM31 could be carried forward into the new plan, as suggested.	Local Plan amended to include new policy criteria on extensions, as suggested. These are principles in extant DM31 which are to be incorporated into the new plan.
	2	QD 11	5. We do not support in-filling gardens and alleyways. We do not want to live in claustrophobic areas with no breathing space. Gardens must be protected. There might be the occasional situations where it's not a problem, but most of the time it would be unacceptable to build on gardens.	Noted. Permitted development rights are outside the scope of the Local Plan. The removal of permitted development rights would need to be addressed through an Article 4 Direction, which is also outside the scope of the Local Plan. QD11 makes clear that development on garden land should	No change.

				be avoided, and sets out exceptional circumstances in which this may be appropriate.	
Blackheath Society no 2	2	QD 11	**QD11 Infill and backland sites, back gardens and amenity areas**. This is broadly welcome. Clarification of the scope of back gardens would be welcome. What about side gardens, especially on corner plots? Are they 'infill plots? [Is LBL's policy stricter than GLA? Will this stand up in law?] Private gardens are part of essential greenery.	The Council has prepared a Small Sites SPD which provides further guidance on this policy.	Policy amended to make reference to the Small Sites SPD.
Brockley Society	2	QD 11	Page 139, policy QD11: A number of the borough's conservation areas are characterised by their open, spacious historical layout (see, for example, the Council's Character Appraisal and SPD for the Brockley Conservation Area). Infill or back garden development is often detrimental to this character. Policy QD11 should therefore be clear that development will not be permitted in such cases. We would suggest the following addition to paragraph A: *b. The development has a clear urban design rationale; and* *c. The development does not detract from local and historical character and is not otherwise detrimental to any heritage asset.*	Noted. Permitted development rights are outside the scope of the Local Plan. The removal of permitted development rights would need to be addressed through an Article 4 Direction, which is also outside the scope of the Local Plan. Part c suggested text is covered in heritage policies – plan needs to be read as a whole.	No change.
Home Builders Federation	2	QD 11	**QD11 Infill and backland sites, back gardens and amenity areas** The policy includes sensible design and development principles to protect neighbours and local amenity, but the overall tone of the policy will militate against the delivery of housing on small sites. Lewisham must aim to provide 3,790 homes on small sites of 0.25 ha or less. It is also a requirement of national policy that 10% of Lewisham's housing requirement is provided on sites of 1ha or less (para. 68) – that would be 1,667 homes for the first ten years. We considered the Council's *Sites Allocations Background Paper 2021*. At paragraph 9.3, the Council states: "Lewisham's draft Local Plan seeks to boost the delivery of small housing sites beyond the Borough's historic delivery levels. It proposes a number of approaches and measures to support this objective, whilst seeking to ensure that all such development is sensitive to the area within which it is located. The implementation of these approaches will need to be monitored over time, with the expectation that the Borough will experience an incremental rise in the number of housing units delivered on small housing sites. However, for future housing delivery (e.g. the housing trajectory) we will apply a 'windfall' allowance, based on the trend-based figure." This indicates that it is not the Council's intention to allocate specific small sites. It hopes instead that Policy QD11 will guide applicants. This is too uncertain. The tone of policy QD11 and the supporting text would discourage applications.	The Council has taken a proactive stance in supporting small site development and has prepared a Small Sites SPD to support our policy position. There is no legal requirement for the Council to allocate small sites.	Policy amended to make reference to the Small Sites SPD.

			It is the expectation of the London Plan that infill development and residential conversions, among other things, will provide an important source of the small site supply. Paragraph 4.2.4 of the London Plan states: **Incremental intensification** of existing residential areas within PTAL within 800m distance of a station[47] or town centre boundary[48] is expe play an important role in contributing towards the housing targets fo set out in Table 4.2. This can take a number of forms, such as: new bu development, residential conversions, redevelopment or extension c buildings, including non-residential buildings and residential garages this results in net additional housing provision. These developments generally be supported where they provide well-designed additional meet London's needs. The most effective way to increase delivery on small sites is for the Council to adhere to national policy and identify some through its Local Plan. It should identify small sites that are appropriate for residential development and allocate these. Many local authorities have land in their ownership, including a number of smaller plots, including carparks and vacant office buildings, that could be allocated to support the housing delivery on smaller sites. These should be allocated in the Plan. Suburban areas also contain many gaps where questions of landownership tend to be less complex than in town centres making it easier to allocate these.		
HopCroft Neighbourhood Forum	2	QD 11	The back garden development section also needs attention - back gardens often back on to woodland, railway corridors, abandoned allotments, green land held by holding companies - would they be included and how can the Local Plan protect against issues such as encroachment and land owners agreeing to Adverse Possession claims?	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended to make reference to the Small Sites SPD.
Ladywell Society	2	QD 11	**Protection of gardens (greening the borough and the city)** As much of the green "infrastructure" of the borough is in back and front gardens these should be protected. The paving over of front gardens should be discouraged and more environmentally-friendly methods encouraged (e.g. mesh which allows rain water to percolate through the parking area). Water run-off into the street and general drains can cause sewers to back up during periods of heavy rain.	Noted. Local Plan part 2 Green infrastructure states Development proposals should incorporate high quality landscaping and optimise opportunities for urban greening measures, including by incorporating high quality and species diverse landscaping, wildlife habitat, green roofs and walls, and sustainable drainage systems. Urban greening should be fully integrated into the design-led approach with consideration given to the site setting within the wider landscape, as well as the layout, design, construction and long-term management of buildings and spaces. In some cases, the council exercises no control over the paving over of front gardens due to permitted development rights.	No change.

Ladywell Society	2	QD 11	**Protection of "side" gardens (development)** These extensions occur with corner houses. There seems to be an increasing trend to build an extension or even a new house on the side garden. This is particularly damaging to the streetscape of proportioned terraces etc. in Conservation Areas, but also elsewhere.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended to make reference to the Small Sites SPD.
Lee Manor Society	2	QD 11	**Back-land and back garden development**. The importance of preserving back garden space is acknowledged (p141) with reference made to the visibility of any buildings from the private as well as the public realm. This is important and is welcomed by Lee Manor Society since the long back gardens of Lee form large green oases, enclosed as they are by the houses that front the grid-like street pattern. They also function as important areas for greenery and wildlife. We note that planners will allow building when a back garden runs down to a 4 mews lane or street. This should only be allowed if sufficient garden space is retained.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	1. Sections F and G on page 140 of the draft Lewisham Local Plan regarding garden land (including back gardens) states that "*Garden land makes an important contribution to the character and amenity of Lewisham's neighbourhoods, and often has biodiversity value. The use of garden land for new development should therefore be avoided.* *"Proposals that result in the loss of garden land, including private back gardens will be strongly resisted. This includes the development of back gardens for separate dwellings in perimeter forms of housing".* 2. The accompanying explanation to these proposals (para 5.89) goes further stating that "*development on garden land should be avoided in favour of development opportunities elsewhere in the Borough, particularly on brownfield sites and previously developed land, consistent with the spatial strategy of the Borough*". As this paragraph also makes clear this is in accordance with the National Planning Policy Framework (NPPF) on garden development which states *"Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local development"* Para 53 (NPPF)	Noted. The draft Local Plan approach to garden land is considered to be in line with higher level policies.	No change.

			3. Further, the London Plan 2021 (policy in H2 regarding small sites), states at B3 that boroughs should *"identify and allocate appropriate small sites for residential development"* and, at B4 *"list these sites on their <u>brownfield registers</u>."* *(Emphasis added).* 4. This implies that small sites only include brownfield sites, which in turn is defined at p515 as excluding private gardens: "land which is or was occupied by a permanent structure, including the curtilage of the developed land ……. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; *<u>land in built-up areas such as private residential gardens,</u>* recreation grounds and allotments"		
Lewisham Park Crescent Residents	2	QD 11	5. The comments in sections F and G on page 140 of the draft Lewisham Local plan regarding resistance to development on garden land also respond to what local residents (in an earlier consultation process) have told the Borough of their concerns about the historic environment being damaged by building on back gardens. They would like to see stronger protection for the cultural and natural environment and that green and open spaces are protected from being paved over, especially gardens. 6. Para 5.91 of the accompanying explanation to QD11 of the draft Lewisham Local Plan states that *"Back gardens in perimeter block urban typologies, which have more or less enclosed rear gardens, are considered part of the original design of these types of residential areas, provide valuable amenity space and an ecological resource. We will therefore seek to resist proposals for development on garden land in these locations."* 7. Para 5.92 goes on to state that	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended to make reference to the Small Sites SPD.

			"*Proposals that would result in the loss of garden land, including private back gardens, will be strongly resisted. This includes the development of back gardens for separate dwellings in perimeter forms of housing*". 8. Therefore, it can be clearly seen that the aim of the Lewisham Local Plan is to resist development on garden land, reflecting National and London policy. It also reflects the views of the borough's residents. This is welcomed. 9. Unfortunately, other wording in policy QD11 of the Lewisham Local Plan appears to contradict this overall aim of resisting development on garden land, potentially undermining the protection against development on back gardens, failing to provide planning certainty for developers and not providing the reassurance local residents are seeking regarding preventing the damage caused by building on back gardens.		
Lewisham Park Crescent Residents	2	QD 11	10. Policy QD11 applies to infill and backland sites, back gardens and amenity areas and in summarising the key principles of this policy the wording in the heading of this section has simply been included in one sweeping statement at A which states that "*Development on infill and backland sites, garden land (including back gardens) and amenity areas will only be acceptable where:* *a. The use is appropriate to the site and compatible with land uses in site's immediate vicinity and surrounding area and;* b. *The development has a clear urban design rationale*". 11. Therefore, at the same time as stating that the borough will resist development on garden land they appear to be suggesting that development may be allowed in certain circumstances. This is not in accordance with National and London policy and appears to contradict the Boroughs own policy on garden land. 12. Whether or not a development has a clear urban design rationale is subjective and further complicated by the difficulty of building on garden sites which are typically small and therefore provide greater design	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended to make reference to the Small Sites SPD.

			challenges for developers. Further, it is difficult to see how development on garden land fits with the idea of no net loss of overall greenspace, irrespective of the quality of the design build and use of green walls and roofs. 13. Therefore, we would suggest that the reference to garden land (including back gardens) is taken out of the paragraph in **QD11, A**.		
Lewisham Park Crescent Residents	2	QD 11	14. We would suggest making the importance of garden land including back gardens (as set out in **QD11, F**) clearer by the addition of the suggested text in ***bold italics***. Garden land makes an important contribution to the character and amenity of Lewisham's neighbourhoods, and often has biodiversity value. The use of garden land for new development should therefore be ***strongly*** avoided ***in favour of development opportunities elsewhere in the Borough, particularly on brownfield sites and previously developed land***.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	*15.* **QD11, G** provides that "*Proposals that result in the loss of garden land, including private back gardens will be strongly resisted. This includes the development of back gardens for separate dwellings in perimeter forms of housing".* This is very clear. However, this section goes on to say that *"the loss of garden land will normally only be considered acceptable in exceptional circumstances where:* *a. The proposal is for a comprehensive redevelopment of a number of whole land plots; and* *b. The requirements of (A) above are satisfied".* 16. For the reasons outlined above, we, therefore, also suggest removing the reference here to the requirement of (A) above being satisfied (see para 12 above).	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	17. In addition, and for clarity, we recommend that the clear definition statement on p141 be reiterated in QD11. "**Garden land (including back gardens) comprises private amenity areas that were the entire back garden to the rear of a dwelling or dwellings as originally designed**	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended to make reference to the Small Sites SPD.

			and that such garden land is not defined as Previously Developed Land, as set out in the NPPF."		
Lewisham Park Crescent Residents	2	QD 11	**<u>Paragraphs 5.80 and 5.92 with regard to the explanation to QD11 – pages 141 to143</u>** *1.* Again, the wording in **para 5.80** which seeks to explain the policy includes all the categories of land use covered by this policy grouped together. We would recommend that the reference to garden land is removed from the following passage *"However, there may also be opportunities to make a more beneficial use of land through the redevelopment of smaller sites, such as backland and infill sites, <u>as well as garden land</u> and amenity spaces".*	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11 Para 5.8	22. This passage is contrary to the aim of the policy to resist garden land development and ignores the fact that "garden land, including back gardens, make an important contribution to local character and amenity and often have ecological value", para 5.89 refers here.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11 Para 5.8	23. The reference to garden land in para 5.80 also risks implying that garden plots are suitable for new housing under the policy (HO2) for optimising the use of small sites. The provisions for the use of small housing sites refer to brownfield sites only as set out above in paragraphs 4 and 5.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11 Para 5.9	24.**Para 5.92** states that "*The loss of garden land will normally only be considered acceptable in exceptional circumstances, where sites can be assembled to bring forward comprehensive redevelopment in accordance with other local plan policies"*. 27. We would suggest that the wording here is amended to reflect the wording in QD11, G, so that para 5.92 reads The loss of garden land will normally only be considered acceptable in exceptional circumstances, where **a number of whole land plots can be assembled** to bring forward comprehensive redevelopment in accordance with other local plan policies.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	• That the reference to "<u>garden land (including back gardens)</u>" is taken out of the paragraph in QD11 A.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference

					to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	• That the wording in para 5.80 (*"However, there may also be opportunities to make a more beneficial use of land through the redevelopment of smaller sites, such as backland and infill sites, as well as garden land and amenity spaces") is changed to remove the reference to garden land.*	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	• That the reference to "The requirements of (A) above being satisfied are removed from QD11, G	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11 HO 02	• That the definition statement in paragraph 5.81 on page 141 with regard to garden land be reiterated in QD11 and HO2. **"Garden land (including back gardens) comprises private amenity areas that were the entire back garden to the rear of a dwelling or dwellings as originally designed and that such garden land is not defined as Previously Developed Land, as set out in the NPPF.**	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	• That the guidance in paragraph F on page 140 of QD11 is clarified with the addition of the following suggested text Garden land makes an important contribution to the character and amenity of Lewisham's neighbourhoods, and often has biodiversity value. The use of garden land for new development should therefore be ***strongly*** avoided ***in favour of development opportunities elsewhere in the Borough, particularly on brownfield sites and previously developed land***.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	• That the wording in paragraph 5.92 is changed to incorporate the wording in bold below The loss of garden land will normally only be considered acceptable in exceptional circumstances, where **a number of whole land plots sites can be assembled** to bring forward comprehensive redevelopment in accordance with other local plan policies	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	• That additional protection is given to garden land in conservation areas so that it is made clear that developments on garden land in conservation areas will not be granted planning permission.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
London Wildlife Trust	2	QD 11	We welcome and support the policy, especially parts F and G. However, no precise definition of garden land is set out in the supporting text (other than it is land associated with housing, as referenced too in the Glossary (p817)), perhaps being	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference

			implicit that gardens' collective value is mainly down to the vegetation and other natural features they support. In para 5.92, we therefore suggest explicit reference is made for the need to protect and if needs be, mitigate for in case of unavoidable loss, vegetated garden land. Garden land Page **6** of **11** itself need not be vegetated, but it is vegetation that gives garden their ecological, landscape and climate adaptive character and value.		to the Small Sites SPD.
Sydenham Society	2	QD 11	**QD11 Infill and backland sites, back gardens and amenity areas (p141)** It is the firm view of the Sydenham Society that development on gardens and garden land is incompatible with climate change and is unacceptable.	Local Plan part 2 Green infrastructure states Development proposals should incorporate high quality landscaping and optimise opportunities for urban greening measures, including by incorporating high quality and species diverse landscaping, wildlife habitat, green roofs and walls, and sustainable drainage systems. Urban greening should be fully integrated into the design-led approach with consideration given to the site setting within the wider landscape, as well as the layout, design, construction and long-term management of buildings and spaces. In some cases, the council exercises no control over the paving over of front gardens due to permitted development rights. The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD
Telegraph Hill Society	2	QD 11	We strongly support policies **QD11.F** and **QD11.G** as regards back gardens.	Support noted	No change.
Telegraph Hill Society	2	QD 11	We believe the Council should continue to resist back garden development particularly within the north of the Borough where there are higher levels of air pollution and generally less green space than in the south of the Borough.	Noted.	No change.
Telegraph Hill Society	2	QD 11	Gardens in Inner London make a significant contribution to the character of London; they promote inclusiveness by making inner London homes attractive to those who would otherwise live in the suburbs or the countryside; they provide space for urban wildlife; they add "lungs" to the city removing pollution; and, above all, they make London a desirable place to live. As the GiGL green space map shows, garden space contributes significantly more too overall greening in Inner London than in the outer boroughs and more than public parks and spaces.	Noted.	No change.
Telegraph Hill Society	2	QD 11	On the consequences of the loss of green space, David Elliott, Commissioner on the London Sustainable Development Commission has written: "Children are heard, but not seen – retreating to their bedrooms with screens and headphones. A reduction in outdoor activity is linked to obesity and heart disease crises. Levels of depression seem to go viral, costing immeasurable losses to work days and productivity. "The loss of green spaces that had created a sense of place, a connection to the past and spaces for people to come	Noted.	No change.

			together, has catalysed a fragmentation of communities. House prices collapse as people scramble to move out of a city no longer seen as a place that can provide conditions for decent, or acceptable, living…"vi		
Telegraph Hill Society	2	QD 11	Public green space is necessary, but it does not supplant the need for private garden space which has its own benefits. Private gardens create quiet oases where families can converse, study, or play in safety. Garden and allotment spaces provide the ability to grow food. The COVID-19 pandemic has further brought home the need for private space for exercise and contemplation particularly when homes themselves are getting smaller.	Noted.	No change
Telegraph Hill Society	2	QD 11	Create Streetsvii research has shown that children are more likely to undertake outdoor activity when they have private space in which to do so. They conclude more generally: "People who live in greener neighbourhoods tend to have better cardiovascular health and lower levels of stress regard less of their socio-economic status. The greater the biodiversity in those green spaces, the larger the benefit to or psychological well-being. Participating in activities such as gardening is emerging as a promising treatment for mild to moderate depression."	Noted.	No change.
Telegraph Hill Society	2	QD 11	The above considerations need to be given more weight within the Explanation section for **QD11** (**§ 5.80** through **§ 5.92**) and in addition cross-reference should be made to policies **GR1** and **GR5** (see paragraphs 184 to 197 below) and to how private garden space contributes to the achievement of **Strategic Objectives G16 and G17**.	Noted	Local Plan supporting text amended with additional details on health and wellbeing as suggested
Telegraph Hill Society	2	QD 11	Where development is to be permitted under policy **QD11.G** (in exceptional circumstances), there should be limits on the maximum amount of the site which can be developed, taking into account not only the immediate adjacent residential properties but also the overall amount of green space per capita in the surrounding area.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Telegraph Hill Society	2	QD 11	Policy **QD11.B.a** requires any permitted development to "*respond positively to the … local character*". It is wholly unclear what this means and it could be widely interpreted. We would prefer the policy to require that the development "*is sensitive to and conforms to … local character*". The majority of the considerations on Alterations and Extensions are also appropriate to controlling infill and back garden developments as these have the potential for similar impact and, indeed, may be identical except for ownership and a small separation between the buildings. We believe therefore that the general considerations in **QD10** and in the SPD on Alteration and Extensions need also to be incorporated as protections within **QD11**. There is little point in providing protection from a poorly designed extension if the same criteria are not used for assessing a development on an adjacent infill site.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.

Telegraph Hill Society	2	QD 11	Policy **QD11.D** states that infill development can include development "*on street corners*". However the definition of "infill development" on **page 822** states that it is *"Development that takes place on vacant or undeveloped sites between other developments and/or built form.*" A corner site is not between other developments and built form. There is a danger here that corner sites which form gardens to houses, such as on side streets, will be regarded as "infill" sites for the purpose of this policy. Such sites need to be protected both for the green credentials and because they contribute, by virtue of their position and prominence, to the special characteristics of each area. The policy should be absolutely clear that corner sites will only be included where they are not garden space and where they were previously brown-field sites.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Telegraph Hill Society	2	QD 11	In respect of policy **QD11.F** we would note that gardens also play a role in air pollution reduction and in general health considerations. As stated above, clarity needs to be provided where a site is both on street frontage and/or street corner and is also a back garden – as is frequently the case on residential corner sites. We believe, for all the reasons provided, that QD11.F should take precedence over **QD11.D** (i.e. it is a garden site first and an infill site second) but this is not clear. It would appear that this is the case from **§ 5.81** which only refers to gardens at the side of houses as "infill", but this should be made explicitly clear.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Telegraph Hill Society	2	QD 11	Moreover, we believe that gardens to the side of houses should not, as a matter of principle, be regarded as infill sites **(§ 5.81).** Such gardens can be as important as back gardens to the health and well-being of the Borough's residents for the reasons set out above in paragraphs 115 to 119. We accept that some infill of these sites can contribute to the provision of additional housing, although at the expense of other strategic objectives, but consider that this should be looked at on a case-by-case basis. Side gardens therefore merit a separate policy section within **QD11** which should, at a minimum, provide that where a side garden functions as a back garden (e.g. on corner properties in a triangle of roads), it should be afforded the same protection as back gardens.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Telegraph Hill Society	2	QD 11	We support the principle of the definition in **§5.81** of [Back] Garden Land as "*private amenity areas that were the entire back garden to the rear of a dwelling or dwellings as originally designed"*, which we take to provide protection in the event of the owner selling off part of the original garden and the new owner of that element claiming that this is no longer garden land. However, to afford protection to side gardens (and indeed front gardens), as suggested above, the definition should be widened to read: "*private amenity areas that were the garden to a dwelling or dwellings as originally designed."*	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Telegraph Hill Society	2	QD 11	**§ 5.83** states that "Not all infill, backland, garden land and amenity area sites will be considered appropriate for new development, or for certain types of land uses." This seems in	Agreed.	Policy supporting text wording

			conflict with policy **DQ11** and should be more clearly phrased to state "Not all infill sites will be considered appropriate for new development, or for certain types of land uses. Backland, garden land and amenity area sites will be considered for new development and land uses only where these conform to the stricter requirements of the policy".		amended as suggested
Telegraph Hill Society	2	QD 11	We are less than convinced that the illustration on **page 138** provides a good example of design. We appreciate that this is subjective but suggest the Plan could be more even-handed by showing a mixture of these very contemporary designs with designs which respect the architectural heritage of the Borough. Two examples of the latter. both built as flats on infill/brown sites during the currency of the existing UDP within our Conservation Area are shown below and we are sure there are further examples that the Plan could illustrate: *Officer note: Image provided*	The Local Plan does not prescribe an architectural approach and the document shows examples of heritage assets, contemporary and more traditional development.	No change.
Residents of Sydenham Hill	2	QD 11	**Infill Policy** a) **Garden Land** We agree with the Council that garden land should be protected as much as possible from development. We ask the Council to consider protecting the health and well-being of new residents to Lewisham by ensuring that all new homes have their own outdoor space, ideally garden space, but as a minimum a balcony of sufficient size for its occupiers to exercise there, following lessons learned during the pandemic. We have been very concerned that residents in flats have suffered disproportionately during lockdowns, even where estates have green spaces between blocks, residents are discouraged from using them for exercise and gardening.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Blackheath Society no 2	2	QD 12	**QD12 Shopfronts and QD13 Outdoor advertisements, digital displays and hoardings.** Policy is welcome, especially in the context of Blackheath Village (although CA considerations may trump these anyway)	Support noted.	No change.
Deptford Society	2	QD 12	**Page 145** QD12 (Shopfronts). Item C states Within Conservation Areas and residential areas, internally illuminated box fascia signs and projecting signs will not be permitted unless they successfully relate to the design and detailing of buildings and contribute positively to the distinctive character of a group of buildings or street. Against what criteria will this be assessed and who will make the judgement? We question whether it is possible for this to be objectively assessed.	Noted. This will be considered by Planning Officers on a case-by-case basis, having regard to individual site circumstances and taking into account information submitted by the applicant, including Design and Access and Heritage Statements.	No change.
Hither Green West Campaign Group	2	QD 12	Shop frontages, preservation of Springbank Road shopping parade, and new economic, leisure and cultural opportunities. We support the principle that shopfronts, including their signs, canopies and security installations, must be designed to a high standard. We also welcome proposals which ensure alterations to existing shopfronts and signage enhance the local area's character and reflect the buildings and neighbourhood's character. We strongly urge the council to develop, and enforce, a style guide for shopfronts within our predominantly	Support noted. The Council has an adopted Shopfront Design Guide Supplementary Planning Document. Updates to the guidance may be considered in the future, taking into account resources available. The Council is also continuing to prepare Conservation Area Appraisals. Grant funding for shopfront improvements is outside the scope of the Local Plan.	No change.

			Victorian parades on Hither Green Lane and Springbank Road to ensure a cohesive and sympathetic streetscape is reinstated over time. We encourage the council to immediately bring forward financial support and a grant scheme to help our small businesses improve their shop frontages and forecourts.		
Sydenham Society	2	QD 12	**QD12 Shopfronts (p147)** These are supported	Noted.	No change.
Telegraph Hill Society	2	QD 12	Shop fronts within Lewisham have significantly deteriorated over the years with an unsightly display of varying facias, signage and a proliferation of garish colours and lighting. We therefore strongly support these policies. The pictures immediately below of the New Cross Road show how the uniformity of the initial design of a row of shops can easily be destroyed by unrestrained development:	Noted. The draft Local Plan policy QD12 sets out policies to help ensure shopfronts are designed and maintained to a high quality standard. The photos included in the draft Local Plan are provided for illustrative purposes only and do not carry material weight for planning decisions. As the plan is progressed through the next stages of the process, the Council may take the opportunity to update these, subject to resources available.	No change.
Deptford Society	2	QD 13	**Page 149** QD13 item A should be reworded: Outdoor advertisements, digital displays and hoardings should contribute to attractive and safe environments. Development proposals for these types of installations will ONLY be supported where they are designed to a high quality standard...	Noted.	Policy amended as suggested.
London Wildlife Trust	2	QD 13	We support this policy, especially in respect of parts A)d and f.	Support noted.	No change.
	2	SD	I am contacting you with regards to the Lewisham Local Plan and the adjustments I would like to see made to bring it into alignment with the Lewisham Climate Emergency Strategic Action Plan. 1 - Investment in Green jobs and apprenticeships. If Lewisham is to have a “A thriving local economy that tackles inequalities” then local people need to be trained in jobs for the future. Government funding should be taken advantage of to achieve this and industries beyond energy and construction must also be considered such as city farming, communal composting and environmental education. 2 - A well connected borough. Our local economy will only thrive if the borough is well connected with routes that are accessible and un-congested. New developments must be “car-capped” and support for motor vehicle free households must be prioritised. Implementing actively enjoyable “active-travel” solutions is an essential part of this process. 3 - Future proof developments, including embodied carbon. Housing and developments in the borough must work for the residents, not the developer. Granting planning permission ONLY to those who meet the “Passivehaus” standard will ensure that these developments are fit for the future. As a voluntary standard, Lewisham would be leading by example, something that in itself would be beneficial to the borough.	Noted. Overall it is considered that the Local Plan provides for a holistic and integrated approach to delivering Good Growth over the long term in line with the London Plan and the principles of sustainable development set out in the NPPF. The Local Plan sets out sustainable design and construction policies which are considered to be in conformity with the London Plan. Whilst the Council would broadly support proposals that meet the Passivhaus standard, it is considered that requiring this standard for all new developments would not be financially viable, and therefore present soundness issues with respect to the NPPF. The Local Plan will be amended to address a number of the points raised and strengthen the alignment with the Council’s Climate Emergency Action Plan.	Local Plan has been amended to address points raised including: Strategic objectives amended to signpost support for development of green industry along with transition to a low carbon, circular economy. Parking standards amended to align with the London Plan requirements for car-free and

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	2	SD	Surely the most important factor in Lewisham, particularly but not exclusively is Airborne. Where we live, we have the A205 South Circular on the one hand and behind our Garden, the Railway with its increased heavy freight hauled by aged noisy, pollution spouting diesel locomotives, due to clogged filters, exacerbated by excessive speed. The pandemic has led to an increase in building work which has meant heavy skip lorries and other construction vehicles blocking roads. Hedges ripped out, trees cut down, impermeable surfaces created. This is hardly impacting favourably on Climate Change! We have been impressed by the battle that has been hard 'won 'by [name removed] to try and get action in the name of her daughter [name removed]. It is important that this important	The draft Local Plan acknowledges the critical issue of poor air quality in Lewisham and London, and sets out policies to improve air quality in the borough. This includes a requirement for new major development to be at least air quality neutral. To address air pollution associated with vehicles, and particularly private car use, the Local Plan sets the planning framework to deliver on the London Mayor's objective for 90 per cent of all journeys in inner London to be made by walking, cycling and public transport. As part of this approach, the Local Plan advocates for and seeks that new developments follow the Healthy Streets approach. The Council has and will continue to lobby the London Mayor for the extension of the ULEZ beyond the South Circular.	Local Plan amended to require that all new development is at least air quality neutral (rather than only major development), in line with the London Plan.

			conclusion by the Coroner, results in a tangible outcome. Despite the Council and Mayor of London professing support; this has not resulted in any remedial action. In fact, quite the contrary. There are no pollution monitors on the South Circular where the pollution is known to be excessive. Lewisham Air Quality is stated to be Moderate for this reason! The ULEZ charge is merely a money raising exercise for TFL as it does not address the cause which is too much traffic, (maybe, more necessary than people believe), trying 22to use an inadequate outdated road. With the total closing off of Lewisham side roads shortly to be followed by Greenwich, even during lockdown and less school usage, I can tell from walking across the A205 by the pollution entering my lungs that there has been an increase. We have a Nursery at the closed end of Woodyates Road and children and their Parents are exposed to both danger and polluted air waiting to cross on foot and crossing between traffic. Without a combined sensible strategy from Lewisham, Greenwich and TFL, this Health issue will remain not only unresolved but increased. In 2006, an independent survey of polluted air levels at the Lee Green Crossroads confirmed the high levels of pollution there with the exception of the Leegate area where the pollution busting Plane trees are. These are set for REMOVAL under the one size fits all scheme currently being concocted. So much for Climate Change remedial measures and signing up for London National Park City which advocates no removal of existing green canopy and increasing trees. You cannot quickly offset mature trees with established ecosystems with trees which will take years to establish or if neglected needing replacement.		
	2	SD	I am contacting you with regards to the Lewisham Local Plan and the adjustments I would like to see made to bring it into alignment with the Lewisham Climate Emergency Strategic Action Plan. 1 - Investment in Green jobs and apprenticeships. If Lewisham is to have a “A thriving local economy that tackles inequalities” then local people need to be trained in jobs for the future. Government funding should be taken advantage of to achieve this and industries beyond energy and construction must also be considered such as city farming, communal composting and environmental education. 2 - A well connected borough. Our local economy will only thrive if the borough is well connected with routes that are accessible and un-congested. New developments must be “car-capped” and support for motor vehicle free households must be prioritised. Implementing actively enjoyable “active-travel” solutions is an essential part of this process. 3 - Future proof developments, including embodied carbon.	Noted. Overall it is considered that the Local Plan provides for a holistic and integrated approach to delivering Good Growth over the long term in line with the London Plan and the principles of sustainable development set out in the NPPF. The Local Plan sets out sustainable design and construction policies which are considered to be in conformity with the London Plan. Whilst the Council would broadly support proposals that meet the Passivhaus standard, it is considered that requiring this standard for all new developments would not be financially viable, and therefore present soundness issues with respect to the NPPF. The Local Plan will be amended to address a number of the points raised and strengthen the alignment with the Council’s Climate Emergency Action Plan.	Local Plan has been amended to address points raised including: Strategic objectives amended to signpost support for development of green industry along with transition to a low carbon, circular economy.

			Housing and developments in the borough must work for the residents, not the developer. Granting planning permission ONLY to those who meet the “Passivehaus” standard will ensure that these developments are fit for the future. As a voluntary standard, Lewisham would be leading by example, something that in itself would be beneficial to the borough. Embodied carbon must also be included in the environmental impact of development and maintenance. 4 - An holistic approach to development in the borough. Transport, jobs and housing are all connected issues, and must be considered as such in all future developments. An holistic appreciation of these complex needs will help build resilient and sustainable communities for generations to come. 5 - Adoption of more ambitious and authoritative language. Though the sentiment of the plan is ambitious, it is undermined by consistently weak and ambiguous language, leaving far too much open for negotiation by developers whose priority will always be profit. If the plan is to genuinely work for the people of Lewisham, it must be revised to be more precise and definitive. Adjusting the plan to accommodate these points would demonstrate commitment to addressing the climate emergency and help build a greener, healthier and wealthier borough for all. As a borough with such a young demographic it is imperative that we consider future generations in all development policies by catering for the world they are due to inherit, not just the one we live in now.		Parking standards amended to align with the London Plan requirements for car-free and car-lite development. Additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon). Local Plan amended to provide more authoritative language where possible. For example, by stating that development proposals “must” rather than “should” or “will be expected to”; and replacing “will be resisted” with “refused”.
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					example, by stating that development proposals "must" rather than "should" or "will be expected to"; and replacing "will be resisted" with "refused".
	2	SD	SELCHP SELCHP is proposed as an integral part of the Local Plan. Waste incinerators are usually located in the most deprived neighbourhoods this is socially unjust. Furthermore, by 2035, incineration will be a more carbon-intensive process than even landfill. Remove SELCHP as a priority and shut it down so the borough can meet its climate emergency targets.	The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. For the time being, the Local Plan must therefore continue to safeguard the site for waste management uses.	Local Plan amended to include a new policy point which seeks to improve the environmental performance of existing waste management facilities.
	2	SD	GREEN: Rather than encourage green roofs, which can be abandoned, not watered and look a mess, even cause damp penetration, I think it would be wiser to have realistic grants to install solar panels, Grants for private homes, but also a rule that all new developments have to adhere to. There are certain solar panel arrangements than can make the subsequent sale of a property a problem. So proper one-off grants would be best. Whatever percentage of the building's needs are catered for by the solar panels, will reduce the need for electricity from the grid. Even if it only for the provision of communal lighting. Compound this over the whole borough and it adds up.	The Local Plan broadly supports and promotes the use of sustainable design measures, such as green roofs and solar panels. However, grant funding for these measures is outside the scope of the plan.	No change.
	2	SD	I am contacting you with regards to the Lewisham Local Plan and the adjustments I would like to see made to bring it into alignment with the Lewisham Climate Emergency Strategic Action Plan. 1 - Investment in Green jobs and apprenticeships. If Lewisham is to have a "A thriving local economy that tackles inequalities" then local people need to be trained in jobs for the future. Government funding should be taken advantage of to achieve this and industries beyond energy and construction must also be considered such as city farming, communal composting and environmental education. 2 - A well connected borough. Our local economy will only thrive if the borough is well connected with routes that are accessible and un-congested. New developments must be "car-capped" and support for motor vehicle free households must be prioritised.	Noted. Overall it is considered that the Local Plan provides for a holistic and integrated approach to delivering Good Growth over the long term in line with the London Plan and the principles of sustainable development set out in the NPPF. The Local Plan sets out sustainable design and construction policies which are considered to be in conformity with the London Plan. Whilst the Council would broadly support proposals that meet the Passivhaus standard, it is considered that requiring this standard for all new developments would not be financially viable, and therefore present soundness issues with respect to the NPPF.	Local Plan has been amended to address points raised including: Strategic objectives amended to signpost support for development of green industry along with transition to a low carbon,

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					authoritative language where possible. For example, by stating that development proposals "must" rather than "should" or "will be expected to"; and replacing "will be resisted" with "refused".
	2	SD	The approach to low carbon buildings is one example where the plan fails to deliver ambition commensurate with a Climate Emergency. Many building energy policies in the plan need strengthening, in particular, the requirement for major developments to achieve a 35% reduction against current building standards (SDC3on p.395) is particularly disappointing. National government has mandated a reduction of 31% in 2021 whilst the 2025 Future Homes Standard will require reductions of 75%. Given the Plan provides a framework to 2040, the current draft cannot be reconciled with a genuine desire to address the Climate Emergency. The current and future residents of Lewisham deserve new homes built for the 21st century. The housing crisis of today will not be solved by building homes unsuitable for tomorrow. Finally, whilst the Plan at least seeks to address the operational carbon emissions it remains completely silent on the embodied carbon emissions in new developments in Lewisham. The most energy efficient building could also be the highest carbon if the materials and techniques that it is built with release emissions at or prior to construction. A Lewisham plan which was serious about the climate emergency would not only address the carbon emitted to operate a building but also the carbon emitted to build it. The London Energy Transformation Initiative (LETI) have provided extensive guidance on this element of low carbon design and I would urge the council to adopt their design guide as an aspiration and ultimately a requirement for all Lewisham development. Even the best planning policies though are irrelevant without appropriate enforcement and planning practice. Many of the Lewisham Plan policies designed to limit carbon have "get out clauses" as in SD3 D where developers are invited to demonstrate that low carbon approaches are too expensive or not practical and pay for offsets instead. Currently this results in developments regularly being approved which will need	Noted. The draft Local Plan aligns with the London Plan which includes a zero-carbon target for major residential developments, and to major non-residential developments. To meet the zero-carbon target, an on-site reduction of at least 35 per cent beyond the baseline of Part L ('Conservation of fuel and power') of the current Building Regulations (2013) is required. Both the London Plan and Local Plan are subject to regular review, which will allow for updates in the future to ensure consistency with changes to national planning policy and legislation. The London Plan supports the inclusion of carbon-offset payment policies in boroughs' Local Plans. The Local Plan is clear that carbon offset payments will only be accepted in exceptional circumstances, where the applicant clearly demonstrates that carbon reduction targets cannot be fully met on-site. Planning enforcement is outside the scope of the Local Plan.	Additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon). The LETI guidance signposted, as suggested. Local Plan amended with policy supporting text stating that offset payments should only be used as a last resort.

			significant retrofitting in the coming years to achieve net zero carbon. I would urge the council to adopt a holistic approach to the Climate Emergency and ensure that throughout all departments and especially in planning, a rigorous approach to the net zero ambition is embedded.		
	2	SD	I am contacting you with regards to the Lewisham Local Plan and the adjustments I would like to see made to bring it into alignment with the Lewisham Climate Emergency Strategic Action Plan. 1 - Investment in Green jobs and apprenticeships. If Lewisham is to have a "A thriving local economy that tackles inequalities" then local people need to be trained in jobs for the future. Government funding should be taken advantage of to achieve this and industries beyond energy and construction must also be considered such as city farming, communal composting and environmental education. 2 - A well connected borough. Our local economy will only thrive if the borough is well connected with routes that are accessible and un-congested. New developments must be "car-capped" and support for motor vehicle free households must be prioritised. Implementing actively enjoyable "active-travel" solutions is an essential part of this process. 3 - Future proof developments, including embodied carbon. Housing and developments in the borough must work for the residents, not the developer. Granting planning permission ONLY to those who meet the "Passivehaus" standard will ensure that these developments are fit for the future. As a voluntary standard, Lewisham would be leading by example, something that in itself would be beneficial to the borough. Embodied carbon must also be included in the environmental impact of development and maintenance. 4 - An holistic approach to development in the borough. Transport, jobs and housing are all connected issues, and must be considered as such in all future developments. An holistic appreciation of these complex needs will help build resilient and sustainable communities for generations to come. 5 - Adoption of more ambitious and authoritative language. Though the sentiment of the plan is ambitious, it is undermined by consistently weak and ambiguous language, leaving far too much open for negotiation by developers whose priority will always be profit. If the plan is to genuinely work for the people of Lewisham, it must be revised to be more precise and definitive. Adjusting the plan to accommodate these points would demonstrate commitment to addressing the climate emergency and help build a greener, healthier and wealthier borough for all. As a borough with such a young demographic it is imperative that we consider future generations in all development policies by catering for the world they are due to inherit, not just the one we live in now.	Noted. Overall it is considered that the Local Plan provides for a holistic and integrated approach to delivering Good Growth over the long term in line with the London Plan and the principles of sustainable development set out in the NPPF. The Local Plan sets out sustainable design and construction policies which are considered to be in conformity with the London Plan. Whilst the Council would broadly support proposals that meet the Passivhaus standard, it is considered that requiring this standard for all new developments would not be financially viable, and therefore present soundness issues with respect to the NPPF. The Local Plan will be amended to address a number of the points raised and strengthen the alignment with the Council's Climate Emergency Action Plan.	Local Plan has been amended to address points raised including: Strategic objectives amended to signpost support for development of green industry along with transition to a low carbon, circular economy. Parking standards amended to align with the London Plan requirements for car-free and car-lite development. Additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including

					embodied carbon). Local Plan amended to provide more authoritative language where possible. For example, by stating that development proposals "must" rather than "should" or "will be expected to"; and replacing "will be resisted" with "refused".
Blackheath Society no 2	2	SD	Carbon neutral standards & measures - need much more detail	Noted. The draft Local Plan policies and approaches to carbon management align with the London Plan and are considered proportionate in scope.	No change.
Blackheath Society no 2	2	SD	We support the aim of carbon neutrality by 2030 but agree it will be a challenge, especially with population growth and more home building. We are also keen to see air pollution being tackled urgently and energetically, with suitable targets and a monitoring framework, but recognise that the Council has limited leverage.	Noted. Part 4 of the Local Plan includes the montiroing framework, with a specific monitor for air quality, however it is acknowledged this can be supplemented in line with the Council's latest Air Quality Action Plan.	Local Plan Part 4 monitoring framework amended with additional monitor on air quality i.e. to meet air quality objectives for PM10, NO2 and PM2.5.
Climate Action Lewisham	2	SD	**Sustainable Design** As in other areas, the approach to low carbon buildings in the Draft Lewisham Local Plan brings good intentions but fails to deliver ambition commensurate with a Climate Emergency. Many building energy policies in the plan need strengthening but there are three in particular which CAL believes need urgent revisions:	Noted. The draft Local Plan has been reviewed and updated to align more strongly to the Council's Climate Emergency Action Plan. Further details are set out response to detailed points made by Climate Action Lewisham.	No change.
Climate Action Lewisham	2	SD	C. Whilst the Plan seeks to address the challenges of operational carbon emissions it remains completely silent on the embodied carbon emissions in new developments in Lewisham. The most energy efficient building could also be the highest carbon if the materials and techniques that it is built with release emissions at or prior to the time it is constructed. CAL believes that the Lewisham plan must include a requirement for all major developments to at least assess and in time to address the carbon embodied in their designs. [The	Noted.	Local Plan amended to include additional policy to emphasise the importance of sustainable retrofitting of existing building

			London Energy Transformation Initiative (LETI) have provided extensive guidance on this element of low carbon design and we would urge the council to adopt their design guide as an aspiration and ultimately a requirement for all Lewisham development.]		stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon). A new reference to the LETI good practice guidance is also included.
Climate Action Lewisham	2	SD	It is also CAL's view that policies in this area are not enough. Enforcement and planning practice is integral to successfully addressing the climate emergency in Lewisham's new developments. Many of the Lewisham Plan policies designed to limit carbon have "get out clauses" as in SD3 D where developers are invited to demonstrate that low carbon approaches are too expensive or not practical and pay for offsets instead. Currently this results in developments regularly being approved which will need significant retrofitting in the coming years to achieve net zero carbon. We urge the council to adopt a holistic approach to the Climate Emergency and ensure that throughout all departments and especially in planning, a rigorous approach to the net zero ambition is embedded	The London Plan supports the inclusion of carbon-offset payment policies in boroughs' Local Plans. The Local Plan is clear that carbon offset payments will only be accepted in exceptional circumstances, where the applicant clearly demonstrates that carbon reduction targets cannot be fully met on-site. The Local Plan aligns with the Council's Climate Emergency Action Plan. This sets out how the Council and its service areas will help to mitigate and adapt to climate change.	Local Plan amended with additional policy supporting text stating that offset payments should only be used as a last resort.
Culverley Green Residents Association	2	SD	All residential units should be built to Passivhaus Design, going beyond BREEAM excellent. You should also consider using a policy requiring the use the London Energy transformation Initiative which looks at the embodied carbon, the operational energy of the project and the active measures to reduce energy consumption which are then monitored and measured over time. At least one London Borough (Haringey) is looking to add such a policy to its Local Plan.	The draft Local Plan sets out sustainable design and construction policies which are considered to be in conformity with the London Plan. Whilst the Council would broadly support proposals that meet the Passivhaus standard, it is considered that requiring this standard for all new developments would not be financially viable and technically feasible in all cases, and therefore present soundness issues with respect to the NPPF.	Local Plan amended to include additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions

					(including embodied carbon). A new reference to the LETI good practice guidance is also included.
Culverley Green Residents Association	2	SD	The plan states on a number of occasions how Lewisham was an early adopter of efforts to tackle climate change. The plan highlights the GLA mantra and hierarchy of clean green lean etc. and admits that its waste recycling is one of the worst in London. There are positive proposals around improving the heat island by adding more green walls and roofs, and additional tree planting, but these should be in addition to more useable green space, more pocket parks suds and tree planting along all our main roads and secondary roads, which would also assist with surface water runoff and the likely increase in flooding events caused by climate change. There should be an active programme of hard surface removal.	Noted. The draft Local Plan includes policies on urban greening, SUDs and tree planting recognising the multifunctional benefits of these measures. The Council can only require such measures where new development is proposed, however it will seek other opportunities to deliver environmental improvements. There are also Permitted Development rights which allow for the paving over of front gardens, which the Council does not exercise control over.	No change.
Culverley Green Residents Association	2	SD	All new development should be built to Passivhaus standards, not just housing, and be assessed against the London Energy Transformation Initiative (LETI) as previously mentioned, and go beyond BREEAM excellent. No new development should use gas boilers. All residential units should be connected to a district heating system or have ground source heat pumps, preferably not gas for the district heating, and include mechanical ventilation and heat recovery units as standard. There needs to be a step change in achieving carbon reduction and reducing the amount of energy used to heat and cool our homes, schools, shops and workplaces. There are plenty of exemplar schemes coming along or already built, Lewisham needs to use these and move further. At the very least talk to LETI about the principles and how to translate these into policies and look at the Levitt Bernstein guidance on Passivheus.	The draft Local Plan sets out sustainable design and construction policies which are considered to be in conformity with the London Plan. The Local Plan seeks to ensure that new developments are future proofed and designed to be connection ready to district heating networks, having regard to the Council's Energy Masterplan. Whilst the Council would broadly support proposals that meet the Passivhaus standard, it is considered that requiring this standard for all new developments would not be financially viable, and therefore present soundness issues with respect to the NPPF.	Local Plan amended to include additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon). A new reference to the LETI good practice guidance is also included.
Culverley Green	2	SD	Climate change is a major issue and needs strong policies which need to thread through every single aspect of the policies in	The draft Local Plan acknowledges the issue of global climate change. Responding to the climate emergency is	No change.

Residents Association			the plan, whether it is on parking, traffic, transport, open space, urban greening, new buildings, retrofitting old buildings, declaring clean air areas, controlling lorries and delivery vehicles to low emission or electric or whatever. The health and prosperity of the borough will depend on proactive council action which recruits everyone to help.	one of the Local Plan's key strategic objectives, which the policies together are focussed on.	
Environment Agency	2	SD	**Flood risk management and adapting to climate change** to ensure existing and proposed development and infrastructure is resilient to a changing climate and more extreme weather events. This requires an ongoing catchment approach to managing flood risk and improving the water environment. The map attached shows the current high and medium risk flood zones. We expect flood risk to increase during the plan period and this needs to be carefully considered as part of the site allocation process and delivery of the new planning policies and application the sequential test to steer new development away from the high risk flood zone. Refer to Section 1 for detailed feedback on flood risk management and climate change. **Partnership working to protect and improve the environment** We support ongoing partnership working to improve the Ravensbourne catchment and believe spatial planning has an essential role to play in improving the water environment. The evidence shows the need for positive planning policies to improve the water environment, such as buffer zones between development and rivers to "make space" for water and deliver multiple environmental, social and economic benefits. We support the use of the Lewisham River Corridor Improvement Plan SPD (2015) and are keen to be involved in any updates to the SPD in line with the changes to planning policy and legislation such as Biodiversity Net Gain. Between January and December 2020 there were 23 environmental incidents reported to our national incident hotline from across Lewisham. These incidents ranged from water pollution, waste management issues, fish kills, odour issues, blocked drains, dust, misconnection issues, odour and low flow in rivers. We can share this detailed data which we feel should be included in the Sustainability Appraisal /SEA and become a key part of the evidence base to ensure key local plan policies are in place to prevent any repeat environmental issues and any required infrastructure upgrades are in place to deliver the London Plan housing targets. There are currently pollution incident hotspots around Lewisham town centre, Bell Green and Surrey Canal Triangle. Addressing these pollution issues should tie into improving green spaces across the borough both in terms of biodiversity improvements and for recreational use. We recommend adding the number of environmental incidents as part of the	Noted. The draft Local Plan and Integrated Impact Assessment have been informed by a Strategic Flood Risk Assessment, which forms part of the evidence base. The Council has also prepared a Sequential and Exceptions Test background paper in the consideration of site allocation policies, and has consulted the Environment Agency for feedback on the approaches and outputs of the studies.	The Council will continue working with EA as a key stakeholder. Local Plan amended with new standalone policy on wastewater and water supply, which states that development proposals should have regard to relevant DWMPs. Part 4 Monitoring framework amended to include monitoring on environmental incidents reported to EA national incident hotline.

			local plan annual monitoring process to track if numbers of incidents are reducing and if not what partnership actions are required to address the environmental issues. We are keen to encourage businesses and residents and businesses to report environmental incidents to our incident hotline https://www.gov.uk/report-an-environmental-incident The Lewisham local plan and SEA should include reference to Water Drainage and Wastewater Management Plans (DWMPs) which are the new way for Water and Sewerage Companies (WaSCs) to plan for the future of drainage, wastewater and environmental water quality. DWMPs will be a key part of the evidence base to inform new local plan policies and planning decisions on new development and growth.		
Environment Agency	2	SD Integrated Impact Assessment	**Flood risk management and adapting to climate change** We are keen to continue partnership working with you to deliver the Thames Estuary 2100 plan (TE2100) plan at Deptford Creek and the River Thames to ensure tidal flood risk is managed proactively in Lewisham. Please refer to the latest "TE2100 Briefing for Lewisham" (October 2020) which provides updates and explains the actions required now and in the future to manage tidal flood risk and delivery through the "riverside strategy" approach to improve riverside environments through partnership approach. We recommend the briefing is added to the Sustainability Appraisal for the plan. The TE2100 actions can be delivered through delivery and updates to the Local Plan policies and the Lewisham River Corridor Improvement Plan SPD. The TE2100 Plan's requirements for Lewisham include future raising of all tidal flood defences, together with an ongoing programme of inspection, maintenance, repair and replacement of defences as required. Corridors of land alongside the existing defences should be safeguarded to provide space for these works and "make space for water" through increased riverside buffer zones aiming for 16 metres in tidal areas. Landowners and decision makers have a responsibility to maintain and raise tidal flood defences and follow the latest good practice policies and guidance such as the Estuary Edges guidance.	Noted. The Local Plan sets the planning framework to support the delivery of the TE2100 action plan. There are specific policies included to support the delivery of the plan.	IIA updated to include "TE2100 Briefing for Lewisham (October 2020)" as a relevant key plan and strategy document
Ladywell Society	2	SD	**Declared Climate Emergency (building materials)** According to the UK Green Building Council, about 45% of CO2 emissions come from the built environment, with about 10% directly associated with construction. The Council should be encouraging developers to look at other methods of construction and lead the way in the construction of its "own" buildings, including housing units. An example is Cross-Laminated Timber" (CLT) which is already being used by respected architects in the UK and examples of buildings exist	Noted. The draft Local Plan includes a policy on the 'circular economy' which addresses this matter. The circular economy is an economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'.	No change.

			in Norway, the Netherlands and France. This would be truly visionary.		
Lewisham Green Party	2	SD	Lewisham Green Party wishes to see the Council's Local Plan serve as a key stepping stone to achieving a zero carbon Borough.	Noted. The Local Plan will help give effect to the London Plan, which sets a strategic target for London to be net carbon neutral by 2050. The Local Plan will also support the Council's Climate Emergency Action Plan, which sets a more ambitious target for 2020.	No change.
Lewisham Green Party	2	SD	The Draft Plan makes the distinction in many places between the standards that will be applied to Major and to Minor developments. Examples are to be found at SD2C, SD2D, SD3Bb, SD3C, SD4G, SD5D, SD6B, SD12B. We would argue strongly that if the Council is to achieve the "significant step change in the design quality and environmental performance needed to achieve the Local Plan's objectives, particularly for climate change adaptation and mitigation" it is essential for the highest standards to be applied to both Major and Minor developments. This is especially important in that, in presentations to the Consultation Meetings held to discuss the draft Plan, Council officers on more than one occasion explained how many of the developments envisaged to take place during the life time of the Plan will be Minor rather Major.	The draft Local Plan broadly adopts the London Plan standards throughout the Sustainable Design and Infrastructure section. These standards are considered to be rigorous and proportionate in scope. The Local Plan must be demonstrably deliverable; the setting of higher standards than the London Plan is likely to impact on development viability. The Council is required to review the Local Plan every 5 years, and this will provide an opportunity to consider implementing new standards, taking into account the latest higher level policies, legislation and development viability information.	No change.
Lewisham Green Party	2	SD	The Draft Plan does not indicate the expected total volume of Minor as opposed to Major developments. However, one could expect that the cumulative impact of the Minor development will be substantial and significant and in many parts of the borough the cumulative impact of minor developments is likely to exceed that of any major development in that area.	Noted. An Integrated Impact Assessment has been carried out alongside the draft Local Plan, and has been used to inform its preparation. This includes consideration for Sustainability Appraisal and Strategic Environmental Assessment. The IIA has been informed by the housing growth and population projections underpinning the local plan.	No change.

Lewisham Green Party	2	SD	**We would propose that the default position in the Plan must be that the same high standards should apply to all developments, both major and minor; and that where exceptions are proposed, these should be dealt with through the process proposed below.** **3 SD 1-12 Exceptions must be truly exceptional** It is accepted that there must be room for exceptions to be made to whatever standards are adopted. The Plan must have sufficient flexibility built in to respond to the unexpected and unforeseen. Throughout the lifetime of the plan, however, it must also be expected that the Council will be under pressure from a wide range of sources to modify the standards they are aiming to enforce to mitigate climate disaster. This will include pressure from developers whose margins might not be able to withstand the highest carbon neutral standards, thus leading them to say they cannot proceed with developments that otherwise would, indeed, be beneficial to the community; and pressure on the Council to accept lower carbon neutral standards in exchange for a higher number of affordable housing units which the Borough so sorely needs. It will be essential, however, that a succession of case by case exceptions do not, when looked at globally, constitute a fatal undermining of the overall intentions of the Plan. The same principles need also apply in respect of any proposal to offset carbon emissions (SD3D). **To minimise the risk of the Plan's strategic principles being so undermined, it is, therefore, proposed that a rigorous and transparent process be constituted to manage any request for exception to the standards set out in the Plan, which would include the following:** **any recommendation to apply a lower standard than that set out in the Plan, or to offset carbon usage, be approved by a Council Officer at least one grade higher than would otherwise be the case, up to the position of Chief Officer;** **whenever a recommendation is made for an exception, a list of all previous exceptions and offset decisions made by the Council under the Plan shall be appended, including also both the total square metres (or equivalent appropriate metric), for which planning permission has been granted and for which exception or offsetting had been given to date; and the**	The Council is required to review the Local Plan every 5 years, and this will provide an opportunity to consider implementing new standards, taking into account the latest higher level policies, legislation and development viability information. It is not considered appropriate to maintain the same standards for major and minor development applications in all instances, as this may impact on the development viability of smaller schemes, and requirements may not be proportionate in scope for developments of that scale. With regard to carbon offsetting, the draft Local Plan makes clear that these should only be used in exceptional circumstances, however it is acknowledged that stronger wording around this could be included. It is also acknowledged that further information in the monitoring framework could be included on offset payments to better monitoring implementation of the policy over the plan period. As set out in planning law, planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise.	Local Plan amended to specify that carbon offsetting should only be considered as a last resort. Local Plan Part 4 monitoring framework amended with new monitor on amount of s106 funding secured through carbon offsets.

			proportion of the total square metres for which approval has been given which that represents; **a report is made annually the Mayor setting out the exceptions made and carbon offsetting permitted during the past twelve months.** The number of exceptions should always be kept to a minimum. Discretionary decisions require a higher level of input from officers who are already hard pressed; and such decisions, once they have been made, can be far harder to successfully defend when appealed against appeal by developers, or if called in by Central Government.		
Lewisham Green Party	2	SD	**8 SD1-12 Lapse in time between permission being given and completion of works** The Local Plan is being developed in a very dynamic environment. As our society becomes more aware of range and scale of the problems posed by Climate Change, so standards and technologies are changing fast and the borderlines between what the public generally deems to be acceptable and unacceptable are shifting swiftly. The Planning process, however, is slow, albeit often for very good reasons. A negative aspect of that slowness, however, is that final permission for developments may not be granted until some years after the initial plans were submitted for approval; and the development, itself, may not start, let alone be completed, until many years after that. **We would propose, therefore, that the Plan should recognise the difficulties that may be posed by the often extensive time period between submission of proposals and the completion on site and set out proposals as to how such problems could be mitigated.** **Where this might require powers additional to those the Council already possesses, those, too, should be clearly set out.**	Noted. The period taken on decisions for planning applications is outside the scope of the Local Plan. The Council may consider the use of enforcement powers where new development is not built in accordance with a planning consent.	No change.
London Borough of Southwark	2	SD	It will be interesting to see how the plan responded to newly adopted Nationally Described Contribution of 78% by 2035 target for carbon emissions. Southwark would welcome further conversations on this issue.	The carbon reduction requirements for new developments are set by the London Plan, which are reflected in the draft Local Plan. The Local Plan states that these minimum standards may be subject to review and updating over the	No change.

				plan period, for example, to respond to any changes in higher level policy and legislation.	
Make Lee Green	2	SD	- Buildings contribute half of all carbon emissions in Lewisham, the vast majority it from the existing building stock, yet the Plan is largely silent on this issue. - There should be a much greater focus on upgrading the existing building stock to improve energy efficiency and more to low carbon heating and electricity. - Planning policies should encourage on-site renewable heat and energy generation, such as rooftop solar and ground and air-sourced heat pumps - The same requirements for zero carbon buildings should apply to extensions as to new buildings.	The Council's evidence base confirms that existing building stock contributes significantly to carbon emissions in the borough. The Regulation 18 Local Plan document includes policies on sustainable retrofitting of existing building stock. However it is accepted that the plan can provide more emphasis and support for this. The London Plan sets out an energy hierarchy, which the Local Plan helps give effect to. New developments must apply the energy hierarchy to reduce carbon emissions and minimise energy demand. This may include renewable sources of energy. The Local Plan does not require building extensions to be zero-carbon. There are technical challenges to implementation and monitoring. This is because original building to which the extension is attached may not need to be zero carbon (e.g. in the case of older building stock).	Local Plan amended to include additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon). A new reference to the LETI good practice guidance is also included.
Sydenham Society	2	SD	We understand that the trends listed above will be explored during the forthcoming Examination in Public by the Planning Inspector. However, we wish to put on record the following points: • There should be a greater emphasis in the Local Plan on retaining, refurbishing and retrofitting **existing** buildings. We support the approach taken by [name removed] & [name removed], the winners of the 2021 Pritzker Architecture Prize. Their philosophy is explained at pritzkerprize.com: *Skilful selection of modest materials enables the architects to build larger living spaces affordably… we never see the existing as a problem. We look with positive eyes because there is an opportunity of doing more with what we already have."* • The construction of new buildings (and their associated link roads and hard landscaping) is accelerating the climate emergency. Cement production now accounts for 8% of greenhouse gas emissions of which half is the result of burning carbonate rock and reducing it from calcium carbonate to calcium oxide and the other half is fossil fuel consumed to raise	Noted. The draft Local Plan includes a policy on the 'circular economy' which addresses this matter. The circular economy is an economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'. The Regulation 18 Local Plan document includes policies on sustainable retrofitting of existing building stock. However it is accepted that the plan can provide more emphasis and support for this.	Local Plan amended to include additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon). A new

			the temperature of a cement kiln to the 1,600 degrees C required to make cement. • Steel, reinforced concrete, aluminium, glass and most modern building materials are all massive consumers of C02. In contrast, traditional materials – brick, wood, lime plaster – have excellent thermal properties and avoid the need for mechanical ventilation. Traditional buildings have thermal mass, a stabilising influence on internal temperature and humidity, and particularly beneficial in the kind of hot summer weather the UK is experiencing due to global heating. • Lewisham has recognised the threat to human life posed by the climate emergency. Adopting a policy of retaining, refurbishing and retrofitting existing buildings will not only preserve local character and contribute to community well-being by reinforcing a "sense of place", but will also help save the planet by reducing greenhouse gas emissions. • The imperative to reduce massively carbon dioxide emissions overturns all assumptions about progress that have featured in political discourse in recent decades. Both prosperity and personal freedom will be in short supply if London and the eastern half of the UK are under threat of being engulfed by a North Sea engorged with melt-water from vanishing ice-caps in the Arctic and Antarctica.		reference to the LETI good practice guidance is also included.
Thames Water Utilities Ltd (Property)	2	SD	Thames Tideway Bazalgette Tunnel Limited (trading as Tideway) is the company delivering the construction of the £4.3bn Thames Tideway Tunnel ('TTT'). The Tunnel is being implemented under a Development Consent Order enacted on 3rd September 2014 and which came into force on 24th September 2014. Construction of the project is anticipated to be completed in 2025. London's sewer system carries both foul sewage and surface water, largely making use of the hidden culverted rivers. The original Bazalgette sewage system, built more than 150 years ago, intercepted the old rivers at various points across London – notably along London's embankments (newly built to accommodate them) and diverted combined sewage outflows to the main sewage treatment works downstream to the east of London. The development of the city has inevitably increased the quantity of sewage in the system beyond anything that might have been envisaged 150 years ago. The Thames Tideway Tunnel is a 25km 'super sewer' under the Thames, with a 7.2m internal diameter, to intercept spills and to hold storm discharges in the tunnel until it can be emptied and treated by Beckton Sewage Treatment Works. This will improve the quality of the River Thames and its environment.	Noted. The draft Local Plan includes a policy on wastewater and water supply which supports the delivery of the Thames Tideway Tunnel.	No change.

			Some of the land acquired temporarily or permanently for the purposes of constructing the tunnel will ultimately be available for development, and this will include areas of public realm. Areas within these sites will be retained by Thames Water as operational land for access and operation and maintenance throughout the lifetime of the infrastructure. This land will continue to be subject to the safeguarding included in the Article 52 of the DCO.		
	2	SD	I am contacting you with regards to the Lewisham Local Plan and the adjustments I would like to see made to bring it into alignment with the Lewisham Climate Emergency Strategic Action Plan. 1 - Investment in Green jobs and apprenticeships. If Lewisham is to have "A thriving local economy that tackles inequalities" then local people need to be trained in jobs for the future. Government funding should be taken advantage of to achieve this and industries beyond energy and construction must also be considered such as city farming, communal composting and environmental education. 2 - A well connected borough. Our local economy will only thrive if the borough is well connected with routes that are accessible and un-congested. New developments must be "car-capped" and support for motor vehicle free households must be prioritised. Implementing actively enjoyable "active-travel" solutions is an essential part of this process. 3 - Future proof developments, including embodied carbon. Housing and developments in the borough must work for the residents, not the developer. Granting planning permission ONLY to those who meet the "Passivehaus" standard will ensure that these developments are fit for the future. As a voluntary standard, Lewisham would be leading by example, something that in itself would be beneficial to the borough. Embodied carbon must also be included in the environmental impact of development and maintenance. 4 - An holistic approach to development in the borough. Transport, jobs and housing are all connected issues, and must be considered as such in all future developments. An holistic appreciation of these complex needs will help build resilient and sustainable communities for generations to come. Adjusting the plan to accommodate these points would demonstrate commitment to addressing the climate emergency and help build a greener, healthier and wealthier borough for all. As a borough with such a young demographic it is imperative that we consider future generations in all	Noted. Overall it is considered that the draft Local Plan provides for a holistic and integrated approach to delivering Good Growth over the long term in line with the London Plan and the principles of sustainable development set out in the NPPF. The Local Plan sets out sustainable design and construction policies which are considered to be in conformity with the London Plan. Whilst the Council would broadly support proposals that meet the Passivhaus standard, it is considered that requiring this standard for all new developments would not be financially viable, and therefore present soundness issues with respect to the NPPF. The Local Plan will be amended to address a number of the points raised and strengthen the alignment with the Council's Climate Emergency Action Plan.	Local Plan has been amended to address points raised including: Strategic objectives amended to signpost support for development of green industry along with transition to a low carbon, circular economy. Parking standards amended to align with the London Plan requirements for car-free and car-lite development. Additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated

			development policies by catering for the world they are due to inherit, not just the one we live in now.		carbon emissions (including embodied carbon).
	2	SD 01	This pandemic allied to the need to properly address Climate Change within reasonable parameters; being realistic about the Environment we currently live in should have resulted in a different vision from the one we are currently being presented with.	The draft Local Plan acknowledges the issue of global climate change. Responding to the climate emergency is one of the Local Plan's key strategic objectives which the policies together are focussed on. The Local Plan sets the framework for delivering sustainable development in line with the National Planning Policy Framework and the Good Growth policies of the London Plan.	No change.
Blackheath Society no 2	2	SD 01	**SD1 Responding to the climate emergency**. We support the aims of the policy, which seems sensible.	Support noted.	No change.
DNA	2	SD 01	**04** "As a society our way of living needs to be based around a new contract. A contract that ensures government, business, media, communities and individuals are accountable for their actions and choices, and that we find the way to balance the demands of today against the needs of the future." (The Mayor of Lewisham, Foreword, Lewisham Climate Emergency Strategic Action Plan, 2020-2030). We think the emerging Local Plan and Infrastructure Delivery Plan must be a key tool in achieving and guiding this new contract and crucially it does not do this in its current form). In general terms, this Regulation 18 version of the Local Plan is in our view a good step forward. Especially in applying the threshold approach for affordable housing, and its clarity to protect green spaces from development and overall a more design-led development approach, following the London Plan's Good Growth Polices. However, it is as ambitious as it is short in actual strategic focus and direction and indeed detail, especially for areas like high density Deptford, which have considerably changed over the last few years and are to accommodate unseen levels of growth in population and employment over the next decade. Much of it through already consented development. Hence, this new local plan or indeed our Neighbourhood Plan will have little impact on site design, land-use mix, energy efficiency or planning obligations headline investments. *DNA feels however strongly about the need to test all polices in the emerging Local Plan and shaping Infrastructure Delivery Plan priories against Climate Emergency Action Plans on national, regional and local level - and craft them in the case of Deptford into a bundle of short, medium and long term policy interventions very clearly aimed at also reducing poverty and inequalities and increase health, wellbeing and happiness in the area. An economic and social recovery /restorative strategy and spatial framework for Deptford is needed in our view that maximises the positive local impacts that can come from the London Environment Directors' Network and the Transport and Environment Committee joint Climate Emergency statement priorities. It sets out six priorities:* *1. Retrofit London: Retrofit all domestic and non-domestic buildings to an average level of EPC B;*	Noted. Noted. Overall it is considered that the draft Local Plan provides for a holistic and integrated approach to delivering Good Growth over the long term in line with the London Plan and the principles of sustainable development set out in the NPPF. The draft Local Plan has been both informed by and will support the Council's Climate Emergency Action Plan. It is acknowledged that the plan could benefit from additional policies on sustainable retrofitting and this will be captured through amendments. The draft Local Plan broadly supports the Mayor of London target for 90% of journey's in inner-London to be made by walking, cycling and use of public transport. Encouraging and enabling modal shift is central to the Part 2 Transport policies, as well as the Part 3 area based strategies and policies. The Part 2 Economy and Culture policies can support the transition to a low carbon and circular economy. However it is acknowledged that this could be set out as a strategic objective. Neighbourhood plans are required to be consistent with the strategic policies of a development plan.	Additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon). Strategic objectives amended to signpost support for development of green industry along with transition to a low carbon, circular economy

			2. Low-carbon development: Secure low carbon buildings and infrastructure via borough planning; *3. Halve road journeys made by petrol and diesel;* *4. Secure 100% renewable energy for London's public sector now and in the future;* *5. Reduce consumption emissions by two thirds, focusing on food, clothing, electronics and aviation;* *6. Develop London's low carbon sector and green our broader economy.*		
Grove Park Neighbourhood Forum	2	SD 01	Clause Bc says it will seek biodiversity net gain 'where possible'. It should be a mandatory provision and should be more positively framed. The Environment Bill when enacted will mandate this requirement and so should policy.	Noted.	Local Plan amended to state that Local Plan will deliver net gains in biodiversity.
Grove Park Neighbourhood Forum	2	SD 01	Acknowledgement of **ecosystem services** of green infrastructure and the multiple function and benefits of GI needs to be emphatically stated in this policy and supporting text.	Noted. This is acknowledged and addressed in the draft Local Plan Part 2 Green Infrastructure policies. The plan must be read as a whole, however it is accepted some additional signposting could be beneficial.	Local Plan amended with additional supporting text in Policy GR1 to state the importance of the multifunctional benefits of green infrastructure.
HopCroft Neighbourhood Forum	2	SD 01	Clause Bc says it will seek biodiversity net gain '*where possible*'. It is a mandatory provision and should be more positively framed. The Environment Bill will mandate this requirement and so should policy.	Noted.	Local Plan amended to state that Local Plan will deliver net gains in biodiversity.
HopCroft Neighbourhood Forum	2	SD 01	Acknowledgement of ecosystem services of green infrastructure and the multiple function and benefits of GI needs to be emphatically stated in this policy.	Noted. This is acknowledged and addressed in the draft Local Plan Part 2 Green Infrastructure policies. The plan must be read as a whole, however it is accepted some additional signposting could be beneficial.	Local Plan amended with additional supporting text in Policy GR1 to state the importance of the multifunctional benefits of green infrastructure.
Lewisham Green Party	2	SD 01	In 2019 Lewisham Council declared a Climate Emergency which it followed up by producing its Climate Emergency Strategic Action Plan 2020 -2030. Now, the production of the authority's Local Plan provides an opportunity for the Council to chart its course towards a carbon neutral future, by setting the standards for developments in the Borough over the next two decades.	Noted. The draft Local Plan is being prepared having regard to the Climate Emergency Action Plan and will support its implementation.	No change.

Lewisham Green Party	2	SD 01	Unfortunately, this Local Plan, as currently drafted, is unlikely to achieve the carbon neutral future the local authority wishes to see.	Noted. The draft Local Plan broadly aligns with the carbon management policies in the London Plan.	No change.
Lewisham Green Party	2	SD 01	This submission looks at Section 11 of the Draft Local Plan, Sustainable Design and Infrastructure, and makes suggestions as to how that Section could be revised, so that the Council can get closer to meeting the Climate Emergency goals it has set.	Noted. Comments to additional representations set out elsewhere in this Consultation Statement.	No change.
London Wildlife Trust	2	SD 01	We welcome and support this policy, especially the reference in Part B)c, d & e explicitly recognising the link between the climate and nature crises.	Noted.	No change.
South East London Labour for a Green New Deal	2	SD 01	Lewisham is part of the draft London Plan for London to become a zero carbon city by 2050. Is this ambitious enough?	Noted. The London Plan forms part of the Council's statutory development plan, and the Local Plan will help give effect to it. At the same time, the Local Plan seeks to respond to the Council's own strategic target for the borough to become net carbon neutral by 2030. The Council has prepared a Climate Emergency Action Plan to support this.	No change.
Telegraph Hill Society	2	SD 01	**SD1.B.e** as drafted states that the Council "will ensure that new development does not adversely affect the amenity of the local population and habitats, including by mitigating impacts on and improving air quality in the Borough". This would be better phrased as a prohibition on such developments, and it must be recognised that you cannot "mitigate" an effect to the extent that it "does not adversely affect…": mitigation is merely reduction of an adverse effect not its elimination. We would suggest: "The Council will not permit new developments which adversely affect the amenity of the local population and habitats…".	Noted.	Local Plan policy SD01 amended in line with suggestions.
The St John's Society	2	SD 01	SUSTAINABLE DESIGN & INFRASTRUCTURE The 'Lewisham Climate Emergency Strategic Action Plan' is not mentioned. The Local Plan should look to align with the strategies already set out in this document and make clear reference to them.	Noted. The draft Local Plan has been prepared having regard to the Council's Climate Emergency Action Plan, which has now been adopted.	Local Plan policy SD01 supporting text amended to signpost that the Council has adopted a Climate Emergency Action Plan.
	2	SD 02	All new development should be built to Passivhaus standards, not just housing, and be assessed against the London Energy Transformation Initiative (LETI) as previously mentioned, and go beyond BREEAM excellent. No new development should use gas boilers. All residential units should be connected to a district heating system or have ground source heat pumps, preferably not gas for the district heating, and include mechanical ventilation and heat recovery units as standard. There needs to be a step change in achieving carbon reduction and reducing the amount of energy used to heat and cool our homes, schools, shops and workplaces. There are plenty of exemplar schemes coming along or already built, Lewisham needs to use these and move further. At the very least talk to	The draft Local Plan sets out sustainable design and construction policies which are considered to be in conformity with the London Plan. Whilst the Council would broadly support proposals that meet the Passivhaus standard, it is considered that requiring this standard for all new developments would not be financially viable, and therefore present soundness issues with respect to the NPPF. The Local Plan seeks to ensure that new developments are future proofed and designed to be connection ready to district heating networks, having regard to the Council's Energy Masterplan.	No change.

			LETI about the principles and how to translate these into policies and look at the Levitt Bernstein guidance on Passivheus.	The Council is aware that the Government is considering options to phase out gas boilers. Should new national planning policies or building regulations come into force, these will be taken into account both in terms of decisions on planning applications and through the Local Plan review process.	
	2	SD 02	Future proof developments, including embodied carbon. Housing and developments in the borough must work for the residents, not the developer. Granting planning permission ONLY to those who meet the "Passivehaus" standard will ensure that these developments are fit for the future. As a voluntary standard, Lewisham would be leading by example, something that in itself would be beneficial to the borough. Embodied carbon must also be included in the environmental impact of development and maintenance.	The Local Plan sets out sustainable design and construction policies which are considered to be in conformity with the London Plan. Whilst the Council would broadly support proposals that meet the Passivhaus standard, it is considered that requiring this standard for all new developments would not be financially viable, and therefore present soundness issues with respect to the NPPF.	Local Plan amended to include additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon). A new reference to the LETI good practice guidance is also included.
Blackheath Society no 2	2	SD 02	**SD2 Sustainable design**. We support the aims of the policy, which seems sensible.	Support noted.	No change.
Brockley Society	2	SD 02	Page 391 paragraph F: We suggested the following addition (reflecting the explanation at page 393, para 11.8, which we agree with): *…including on the historic environment and heritage assets.*	Noted.	Local Plan amended with additional text in Policy SD2, as suggested.
Deptford Society	2	SD 02	**Page 391** SD2 Sustainable Design Statements are welcomed but how will proposals be monitored? Will this policy be reflected in planning conditions? How will Lewisham ensure that new developments incorporate their proposed sustainable infrastructure?	Sustainable Design Statements are a way for applicants to demonstrate how their proposals are policy compliant. The Council may apply planning conditions to a planning permission. The use of such conditions is mandated by the national planning policy and legislation. Where development delivered is not in accordance with the planning permission, it will be subject to planning enforcement and the Council may pursue legal action.	No change.
Lewisham Green Party	2	SD 02	**4 SD2 Sustainable retrofitting (SD2F and Para. 11.9)**	Noted.	Local Plan amended to

			Retrofitting will play a key role if Lewisham is to meet the challenges of the Climate Emergency. Even at the end of the 20 year life of the Plan, the vast majority of the buildings in the borough will have been built prior to 2021. The Plan, as currently drafted, does not appear to recognise the crucial role retrofitting must, therefore, play if the Council is to come near to meeting the Climate Emergency targets which it has set itself. **It is essential that the Plan be far more proactive and prescriptive in respect of the retrofitting standards that are required, as far as is allowed in law, rather than just stating that such measures are "supported" (SD2F).** A key section of the Draft Plan (11.8) currently reads "Sustainable retrofitting measures *can* help to improve the energy performance of existing buildings and minimise carbon emissions in the Borough. *Even* small-scale development, such as householder schemes *can* incorporate measures that improve the environmental performance of buildings. This *may* include internal roof, floor and wall insulation, energy efficient fixtures or urban greening. We will therefore *broadly support* sustainable retrofitting measures". We would argue that that should not be the language of a Council fully committed to fighting a Climate Emergency. The Council, itself, recognises in the Plan that one of its tasks is to assist residents to understand the scale of the challenge facing the Borough and to persuade them to help meet it. The language used in the Local Plan, as well as the standards set, needs, therefore, to reflect, throughout, the importance of that endeavour and the gravity of the current position if the measures taken are inadequate. **"Can", "may" and "broadly support" should be replaced by "will", "shall" and "fully support" or "require", so as to further promote low carbon standards and to send the right messages out to local householders.**		include additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon). A new reference to the LETI good practice guidance is also included. Local Plan amended to provide more authoritative language where possible. For example, by stating that development proposals "must" rather than "should" or "will be expected to"; and replacing "will be resisted" with "refused".
London Wildlife Trust	2	SD 02 SD 03 SD 04 SD 06 SD 07 SD 08 SD 10	We support these policies.	Support noted.	No change.

		SD 11 SD 12			
Quaggy Waterway Action Group	2	SD 02	QWAG supports the Local Plan's aims to 11 *"Realise long-term reductions in energy use and carbon emissions in helping London to become a zero carbon city by 2050, by increasing the use of sustainable transport modes - including walking and cycling - ensuring that new development is designed to reduce car use and maximise energy efficiency, along with integrating greening measures to limit the urban heat island effect"* 12 *"Guard against the risk of flooding by ensuring that new development is appropriately located, implementing sustainable drainage systems, retaining and enhancing flood defences including through river restoration works, along with improving the water quality of the rivers Thames, Ravensbourne, Quaggy and Pool."*	Support noted.	No change.
Quaggy Waterway Action Group	2	SD 02	Long term reductions require early action to get on a trajectory so the emphasis should not be on long term when action is needed now. River restoration is required for a range of reasons including natural flood defences. Improving water quality matters but the objective should focus on ecological quality of the river corridor and catchment as a whole, including water quality.	Noted. The Local Plan will carry full material in planning decisions, subject to it being found sound at examination and formally adopted by the Council. Whilst the Local Plan covers a long-term horizon, policies can be implemented on adoption.	No change.
The Hatcham Society	2	SD 02	Climate Emergency We appreciate Lewisham's acknowledgement of the ongoing and worsening climate emergency in the Plan. However, we do not believe the plan goes far enough to prove that the council is doing all it can to help mitigate the climate emergency. In the Sustainable Design and Infrastructure document, it says that the council considered "Requiring developments to meet carbon targets on-site in every case (e.g. not allowing flexibility for offset payments)" but instead settled for allowing flexibility for offset payments. If Lewisham was truly serious about the climate emergency, there would not be any flexibility and new developments must be forced to meet carbon targets on site. The Plan should encourage developers to adopt the Passivhaus method of building where homes are well insulated and relatively airtight so they do not require much heating or cooling (see the Stirling Prize nominated Goldsmith Street development for Norwich City Council). If the Passivhaus method was the borough's voluntary standard, the council would show it is taking their declaration of the Climate Emergency seriously.	Noted. The London Plan supports the inclusion of carbon-offset payment policies in boroughs' Local Plans. The Local Plan is clear that carbon offset payments will only be accepted in exceptional circumstances, where the applicant clearly demonstrates that carbon reduction targets cannot be fully met on-site. The Local Plan sets out sustainable design and construction policies which are considered to be in conformity with the London Plan. Whilst the Council would broadly support proposals that meet the Passivhaus standard, it is considered that requiring this standard for all new developments would not be financially viable, and therefore present soundness issues with respect to the NPPF. The BREEAM is widely accepted as good practice and the Council is therefore proposing to include this as a benchmark standard for certain types of developments.	Local Plan amended with policy supporting text stating that offset payments should only be used as a last resort.

			The Plan relies heavily on the adoption of BREEAM, the sustainability assessment method created by the BRE to determine if plans for a new development are sufficiently sustainable. We would like to see Lewisham council investigate whether this assessment method goes far enough in creating sustainable homes. It must not be forgotten that BRE standards are not necessarily the golden standard (please see the BRE's evidence in the ongoing Grenfell Inquiry) and Lewisham should look to see whether they can go beyond the recommended standard to become a leading light in the field of sustainability.		
The St John's Society	2	SD 02	Housing makes up half of the borough's CO2 emissions (p6 in Lewisham Climate Emergency Strategic Action Plan). Retrofitting of existing housing stock must take place as a matter of urgency and the borough needs to actively support and encourage this. There is an inevitable conflict between necessary improvements to energy efficiency and heritage assets which will continue to prevent many improvements taking place.	Noted. The Local Plan will be amended to provide further support and information on retrofitting. The draft Local Plan acknowledges there may be some tension with retrofitting where heritage assets are concerned – and it provides that development proposals for retrofitting will be considered in line with heritage policies.	Local Plan amended to include additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon). A new reference to the LETI good practice guidance is also included.
TIDE CONSTRUCTION LTD	2	SD 02	**Policy SD2 - Sustainable Design** Part A of draft Policy SD2 requires the submission of a Sustainable Design Statement. This is unnecessarily onerous. A summary of sustainability measures and demonstration of how relevant policy requirements have been satisfied is the remit of a Planning Statement drawing from the DAS and Energy and Sustainability Statement. This requirement is unnecessary, duplicates information already being provided and adds a further unnecessary cost to the Applicant. As such, this requirement should be removed from policy SD2.	Disagree. The Sustainable Design Statement is considered necessary to assist officers in assessing planning applications and ensuring development proposals are policy compliant. The level of detail included in the Sustainable Design Statement will be commensurate with the nature and scale of development, and may cross-reference other statements required to support the planning application.	No change.

	2	SD 03	4. There is a risk that developers will choose to pay into the carbon offset fund rather than to build carbon neutral, considering it to be the cheaper option. We ask that wording be strengthened to explain what criteria are acceptable for allowing payment into the offset fund and that mere savings will not be one of them.	The London Plan supports the inclusion of carbon-offset payment policies in boroughs' Local Plans. The Local Plan is clear that carbon offset payments will only be accepted in exceptional circumstances, where the applicant clearly demonstrates that carbon reduction targets cannot be fully met on-site.	Local Plan amended with policy supporting text stating that offset payments should only be used as a last resort.
	2	SD 03	Climate change is a major issue and needs strong policies which need to thread through every single aspect of the policies in the plan, whether it is on parking, traffic, transport, open space, urban greening, new buildings, retrofitting old buildings, declaring clean air areas, controlling lorries and delivery vehicles to low emission or electric or whatever. The health and prosperity of the borough will depend on proactive council action which recruits everyone to help.	The draft Local Plan acknowledges the issue of global climate change. Responding to the climate emergency is one of the Local Plan's key strategic objectives, which the policies together are focussed on.	No change.
Blackheath Society no 2	2	SD 03	**SD3 Minimising greenhouse gas emissions**. The policy seems sensible but we cannot comment on its practicality or likely effectiveness. Does A (and D) apply to all developments, not just major ones (B and C)? If so, what is expected of them? If not, what is/should be required of them? The policy could be clearer on this.	Noted. Draft Local Plan policy SD3.A is clear that all development proposals should seek to reduce greenhouse gas emissions in line with the London Plan energy hierarchy, so to help Lewisham become a zero carbon Borough. SD3.B states that specific carbon reduction requirements apply to major developments only, in line with the London Plan.	No change.
Climate Action Lewisham	2	SD 03	A. The requirement for major developments to achieve a 35% reduction against current building standards (SDC3 on p.395) is particularly disappointing. National government has mandated a reduction of 31% in 2021 whilst the 2025 Future Homes Standard will require reductions of 75%. As a framework through to 2040, the current Draft Lewisham Plan cannot in our view be reconciled with a genuine desire to address the Climate Emergency. It is imperative that a significantly more ambitious requirement is adopted from today. Doing so will not only limit the contribution of new homes in Lewisham to the climate emergency but also ensure that Lewisham's future residents are not left in homes unsuitable to 21st century requirements. The housing crisis of today will not be solved by building homes unsuitable for tomorrow.	The minimum on-site carbon reduction requirements for major developments are set by the London Plan, which are reflected in the draft Local Plan. The Local Plan states that these minimum standards may be subject to review and updating over the plan period, for example, to respond to any changes in higher level policy and legislation.	No change.
Lee Forum	2	SD 03	The plan describes that 'in exceptional circumstances where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site ..... a. A cash-in-lieu contribution to Lewisham's carbon offset fund; or b. Appropriate off-site measures where these can be demonstrated to be deliverable''. It is commendable that Lewisham has made contributions to its carbon offset fund £104 per tonne, above the £95 per tonne required by the London Plan. However, Leegate's proposed development in Lee Green is a test case for the draft plan, and in conversation with the developer we are told that it is choosing to pay the £104 per tonne rather than to build zero carbon because it's cheaper. Contribution to the carbon offset fund should be a last, not a first response. How	The London Plan supports the inclusion of carbon-offset payment policies in boroughs' Local Plans. The Local Plan is clear that carbon offset payments will only be accepted in exceptional circumstances, where the applicant clearly demonstrates that carbon reduction targets cannot be fully met on-site.	Local Plan amended with policy supporting text stating that offset payments should only be used as a last resort.

			will developers be preventing from avoiding building zero carbon just because it's cheaper for them to do so?		
London Borough of Southwark	2	SD 03	Southwark supports Lewisham for the declaration of a Climate Emergency. As set out in policy SD3 Minimising greenhouse gas emissions Southwark also supports the supports the reduction in borough-wide carbon emissions towards a local target of net zero carbon by 2030, contributing toward the London Mayor' strategic target for London to become a zero carbon by 2050.	Support noted.	No change.
London Borough of Southwark	2	SD 03	With regards to Carbon emissions from new development, Southwark is supportive of an average on-site carbon emission reductions of at least 35% compared to Building Regulations 2013 for approved major development applications. Southwark is also supportive of the approach for major development to meet at least air quality neutral standards.	Support noted.	No change.
South East London Labour for a Green New Deal	2	SD 03	The plan should aim to significantly reduce, in particular, plastics going to incineration. Incinerators emit large quantities of CO2, roughly a tonne of CO2 for every tonne incinerated. Approximately half of this CO2 derives from fossil sources such as plastic. For decades incinerators have been releasing harmful greenhouse gas (GHG) emissions without compensating society for the associated harm that this has caused. In June 2011 Defra acknowledged (in their Economics of Waste and Waste Policy publication) that incinerators were "creating GHG emissions without paying the relevant price". Unlike power stations, waste incinerators are not part of the Emissions Trading Scheme, and therefore the relevant BEIS carbon prices to use are those for non-traded carbon. Therefore the strategy of what is sent for incineration needs a serious review, to promote actual recycling (not the easy option of incineration) and to reduce the volume of plastics sent for incineration to a minimum.	Noted. The draft Local Plan policy SD11 supports the circular economy approach as a means to reduce and sustainably manage waste. To aid policy implementation it is acknowledged that reference could be made to the relationship to the waste hierarchy. However, the type of material sent for waste incineration is outside the scope of the Local Plan, which is focused on the development and use of land. The Council is preparing a new Waste Management Strategy 2021-2031, which sets out further details and priorities on this topic area.	Local Plan policy SD11 amended to clarify circular economy relationship with the waste hierarchy.
South East London Labour for a Green New Deal	2	SD 03	Housing is biggest form of carbon emissions in Lewisham, mainly from domestic gas and followed by transport. The Plan proposes to minimise the per capita emissions of greenhouse gasses, including by supporting energy efficient buildings and the generation of heat/power from low carbon sources The Plan appears to focus on decentralised heat networks in new developments. Whilst this may ultimately be effective, we believe insufficient attention is paid to small scale renewable energy, and to improving the energy efficiency of existing buildings. This is also a fuel poverty issue and partnership with organisations such as SELCHE is crucial. It is essential that funding is available for improving energy efficiency through insulation, draught proofing etc. to existing buildings which would also create green jobs.	Noted. The Regulation 18 Local Plan document includes policies on sustainable retrofitting of existing building stock. However it is accepted that the plan can provide more emphasis and support for this.	Local Plan amended to include additional policy to emphasise the importance of sustainable retrofitting of existing building stock
Blackheath Society no 2	2	SD 04	**SD4 Energy infrastructure**. Given major carbon generation by households, we support the policy aim, which seems sensible. We cannot comment technically.	Support noted.	No change.
Climate Action Lewisham	2	SD 04	B. We recognise that heat networks have the potential to make a material contribution to Lewisham's approach to low carbon heating (SD4B on p.395). However, historically there is a track	The removal of, or changes to, the energy hierarchy as suggested would be contrary to the London Plan.	No change.

			record (including in some of Lewisham's landmark developments) of simply swapping individual gas boilers for centralised plant rooms burning natural gas. As it stands, the current policy could lead to developers in some areas being encouraged to install a gas-powered communal heating system rather than individual air source, ground source or water source heat pumps. We recognise the council's desire to provide ready offtake customers for future heat networks, but we do not believe that this should come at the expense of renewable solutions which could be deployed today. Heating hierarchies such as that proposed in SD4 D should be replaced with hierarchies which prioritise deployment of renewable heating today even where this makes connection to future heat networks more difficult. Lewisham does not have time to wait for future networks before starting to roll out low carbon heating in the borough.	The Government is currently considering national policy and/or legislation which would effectively ban the use of gas boilers in new development and potentially retrofits. The Council will monitor higher level policy to ensure the Local Plan remains consistent with it.	
Lewisham Green Party	2	SD 04	**5 SD4 Energy Infrastructure** The Draft Plan gives great prominence to the introduction of Combined Heat and Power (CHP) in new developments. Whilst CHP is to be welcomed in so far as it promotes an efficient use of energy, we would argue that it is essential that priority is given to ensuring, wherever possible, green carbon neutral energy supply in all new developments. **In its enthusiasm to promote CHP, however, the Draft Plan envisages that new CHP could run on fossil based fuels. This should not be seen as acceptable, unless a robust and costed plan is also available to show how such a scheme could transition to a renewable fuel supply by, for instance Year 5 or Year 10 of the scheme in question. SD4E should be strengthened along these lines.** In Lewisham, the story of SELCHP over the past twenty years is one where ambition has always far exceeded achievement. Waste has been incinerated, but very little heat or power has been transferred to nearby homes or offices or shops. CHP requires significant infrastructural capital outlay, as the Draft Plan notes. It is essential that in ten years time Lewisham is not locked into expensive CHP systems using fossil fuels and emitting greenhouse gases.	Noted. The draft Local Plan policies on energy infrastructure are considered to be in line with the London Plan. To inform the preparation of the Local Plan and support its implementation, the Council has prepared an Energy Masterplan which considers the feasibility of CHP network delivery, including through maximising opportunities presented by SELCHP. The Council considers the proposals are sound. Whilst the Council aims to support the transition to a low carbon economy, including through the promotion of sustainable energy sources (thus reducing use of and reliance on fossil fuels), the representation does not make clear how green, carbon neutral energy supply in all new developments could be feasibly or viably delivered especially in the short term.	No change.
London Borough of Bromley	2	SD 04	Policy SD4 refers to heat networks and requires major developments to connect and possibly extend existing or planned future heat networks on or in proximity to their site. We would welcome additional wording which refers to potential connection to networks in adjacent Boroughs.	Noted.	Local Plan supporting text amended to reflect that developments should have regard to potential

					connection opportunities in adjoining boroughs.
London Borough of Southwark	2	SD 04	As set out in policy SD4 Energy Infrastructure, Southwark supports the strategy to connect to DHN in accordance with the Energy Hierarchy and the use of the London Heat Map, as set out by the GLA.	Noted.	No change.
	2	SD 05	There are positive proposals around improving the heat island by adding more green walls and roofs, and additional tree planting, but these should be in addition to more useable green space, more pocket parks suds and tree planting along all our main roads and secondary roads, which would also assist with surface water runoff and the likely increase in flooding events caused by climate change. There should be an active programme of hard surface removal.	Noted. The Local Plan includes policies on urban greening, SUDs and tree planting recognising the multifunctional benefits of these measures. The Council can only require such measures where new development is proposed, or off-site to mitigate the impacts of a development, however it will seek other opportunities to deliver environmental improvements.	No change.
Blackheath Society no 2	2	SD 05	**SD5 Managing heat risk**. We believe greater planting (and proper maintenance) of trees in new developments and in town centres and residential streets would help tackle this problem, as well as air pollution and water run-off.	Noted. The role of greening measures (including tree planting) to help reduce and manage heat risk is captured by the London Plan cooling hierarchy, which the draft Local Plan policy SD05 refers. Support for greening measures, and recognition of the multifunctional benefits, is also included elsewhere in the Local Plan, for example in Part 2 High Quality Design policies on public realm and Green Infrastructure.	No change.
Deptford Society	2	SD 05 LNA SA 12	**Page 403** SD5 E- Can these public realm environmental points link in with Green Infrastructure policies to go further to actively encourage the planting of trees in new developments? Albany Theatre: Any development of Albany land needs to retain mature trees and safeguard the green space here.	Noted. The community gardens at the Albany Theatre are identified as non-designated open space (Community Open Space). The Local Plan will be amended to make clear the requirements around the protection of these spaces.	Local Plan amended to state that priority should be given to urban greening measures for shading and passive cooling in the public realm. Albany Theatre site allocation amended to provide clarity on status of the community gardens as Community Open Space, with cross-reference to Policy GR2 Open Space, which sets out policies

					for managing this type of land.
London Wildlife Trust	2	SD 05	We welcome and support this policy, particularly with reference to Part E.	Support noted.	No change.
	2	SD 06	My comment on the attitude to reducing the impact of the Car is that it is an issue that is extremely important in terms of Air Quality, improvement of the physical environment and for the wider crisis of responding to Climate Change. However, not all people are fit and young and able to shop small and frequently or ride a bike. Lifestyles have changed, and elderly and disabled residents must be taken into account in terms of carrying goods. Home delivery of food during the Pandemic has been excellent for those who are Shielding or socially isolating, but these deliveries together with on-line shopping, still use vehicular transport. Will these services remain in the Recovery? I have reduced my use of a personal vehicle massively and despite some health issues can walk anywhere within 15 minutes of my home, or further with companions. However, in light of the highlighting of safety issues for women in the public environment and in respect of both enjoying day or night-time leisure activities, and needing to reach home or travel without danger, I personally will continue to use the option of my car, when I deem it necessary.	Noted. The draft Local Plan seeks to delivery on the London Mayor's target for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The Part 2 Transport policies set out approaches to encourage and enable modal shift. The Part 2 Transport policies address deliveries and servicing, and in part respond to changing businesses practices and consumer behaviours, for example, linked to online shopping. The Part 2 Policies High Quality Design respond to the need for developments to be designed to ensure safe and inclusive environments for people of all ages, backgrounds and abilities.	No change.
	2	SD 06	As a priority, there is need to maximise efforts to cleanse our air. The potential damage to health by poor air quality is well documented and now universally accepted. The measured absence of good quality air is a particular problem in our location and vehicle exhaust and noise pollution is a major factor in contributing to poor health and premature death. It is essential the LPA specifically address the evidence based data that has been published recently for roads around Bell Green. Highest levels of pollutants and contaminants in our air is recorded at every choke point or traffic light in the area from Perry Hill to Perry Rise and to the traffic backlogs in both directions at the Southend Lane bridge and at every traffic light on the Bell Green gyratory. Every methodology, every technology improvement, every alteration to road layout must be deployed to significantly reduce pollution. Every opportunity must be explored to establish any green parklet with shrubs and trees which would help absorb pollutants, capture carbon, block car emissions and create a "green barrier", all with known benefits in terms of health and general well-being. Green screen planting around Haseltine school would be a great advantage. Providing equitable access to green space is an important goal of health-oriented urban policies. Improving the availability of green spaces in under-served and socioeconomically	The draft Local Plan acknowledges the critical issue of poor air quality in Lewisham and London, and sets out policies to improve air quality in the borough. This includes a requirement for new major development to be at least air quality neutral. To address air pollution associated with vehicles, and particularly private car use, the Local Plan sets the planning framework to deliver on the London Mayor's objective for 90 per cent of all journeys in inner London to be made by walking, cycling and public transport. As part of this approach, the Local Plan advocates for and seeks that new developments follow the Healthy Streets approach.	Local Plan amended to require that all new development is at least air quality neutral (rather than only major development), in line with the London Plan.

			disadvantaged communities may help to reduce health inequalities in urban populations.		
	2	SD 06	Surely the most important factor in Lewisham, particularly but not exclusively is Airborne. Where we live, we have the A205 South Circular on the one hand and behind our Garden, the Railway with its increased heavy freight hauled by aged noisy, pollution spouting diesel locomotives, due to clogged filters, exacerbated by excessive speed. The pandemic has led to an increase in building work which has meant heavy skip lorries and other construction vehicles blocking roads. Hedges ripped out, trees cut down, impermeable surfaces created. This is hardly impacting favourably on Climate Change! We have been impressed by the battle that has been hard 'won 'by [name removed] to try and get action in the name of her daughter [name removed]. It is important that this important conclusion by the Coroner, results in a tangible outcome. Despite the Council and Mayor of London professing support; this has not resulted in any remedial action. In fact, quite the contrary. There are no pollution monitors on the South Circular where the pollution is known to be excessive. Lewisham Air Quality is stated to be Moderate for this reason! The ULEZ charge is merely a money raising exercise for TFL as it does not address the cause which is too much traffic, (maybe, more necessary than people believe), trying 22to use an inadequate outdated road. With the total closing off of Lewisham side roads shortly to be followed by Greenwich, even during lockdown and less school usage, I can tell from walking across the A205 by the pollution entering my lungs that there has been an increase. We have a Nursery at the closed end of Woodyates Road and children and their Parents are exposed to both danger and polluted air waiting to cross on foot and crossing between traffic. Without a combined sensible strategy from Lewisham, Greenwich and TFL, this Health issue will remain not only unresolved but increased. In 2006, an independent survey of polluted air levels at the Lee Green Crossroads confirmed the high levels of pollution there with the exception of the Leegate area where the pollution busting Plane trees are. These are set for REMOVAL under the one size fits all scheme currently being concocted. So much for Climate Change remedial measures and signing up for London National Park City which advocates no removal of existing green canopy and increasing trees. You cannot quickly offset mature trees with established ecosystems with trees which will take years to establish or if neglected needing replacement.	The draft Local Plan acknowledges the critical issue of poor air quality in Lewisham and London, and sets out policies to improve air quality in the borough. This includes a requirement for new major development to be at least air quality neutral. To address air pollution associated with vehicles, and particularly private car use, the Local Plan sets the planning framework to deliver on the London Mayor's objective for 90 per cent of all journeys in inner London to be made by walking, cycling and public transport. As part of this approach, the Local Plan advocates for and seeks that new developments follow the Healthy Streets approach. The Council has and will continue to lobby the London Mayor for the extension of the ULEZ beyond the South Circular.	Local Plan amended to require that all new development is at least air quality neutral (rather than only major development), in line with the London Plan.
	2	SD 06	The plan acknowledges and maps the many areas in the Borough which have poor air quality and high levels of air	The draft Local Plan acknowledges the critical issue of poor air quality in Lewisham and London, and sets out policies to	Local Plan amended to

			pollution. It refers to NOX and PM 10 but I thought that the current concerns were also about particles down to PM2.5 as being extremely detrimental to health. The recent coroners report about air pollution being a cause of death of the little girl living alongside the South Circular in Lewisham and suggesting that the Council had failed to tackle the problem should have led to more being done in the plan to set out policies and proposals to actively mitigate the problem. Even if these are matters which have to be tackled London wide in conjunction with other bodies the Plan should set out what Lewisham is prepared to do to improve air quality along the worst corridors and in the worst areas. This is particularly important given that a number of the large housing sites and the areas of intensification are in the worst areas or along the worst polluted main road corridors. New housing can mitigate impacts indoors by the use of expensive pollution mitigation solutions but this does not tackle the problem outside. Asthma is an increasing health issue amongst our young children, proactive solutions need to be taken. The ULEZ just makes the south circular worse.	improve air quality in the borough. This includes a requirement for new major development to be at least air quality neutral. To address air pollution associated with vehicles, and particularly private car use, the Local Plan sets the planning framework to deliver on the London Mayor's objective for 90 per cent of all journeys in inner London to be made by walking, cycling and public transport. As part of this approach, the Local Plan advocates for and seeks that new developments follow the Healthy Streets approach. Point on PM2.5 noted. Lewisham's Air Quality Management Action plan identifies that this type of particulate is detrimental to public health. The Council has and will continue to lobby the London Mayor for the extension of the ULEZ beyond the South Circular.	require that all new development is at least air quality neutral (rather than only major development), in line with the London Plan. Local Plan amended with additional supporting text on Air Quality policy, to state that PM2.5 is a pollutant of concern, as it poses a serious risk to public health.
Blackheath Society no 2	2	SD 06	**SD6 Improving air quality**. We agree that air quality is a significant public health issue in Lewisham. We agree with policies designed to prevent new developments from increasing current unsatisfactory levels of air pollution, especially in the north of the borough which is an AQMA. We are therefore surprised that Blackheath Village is not an Air Quality Focus Area (AQMA). It is in a small hollow that traps pollution. It is a through route stop for several busy bus routes (54, 89, 108, 202, N89), through heavy lorries (especially while Kidbrooke Park Road has a 7.5 ton weight restriction) and through car traffic. It has narrow streets in the centre and two pelican crossings in each direction, which means it has a lot of idling traffic. This is a major handicap when trying to sell the neighbourhood as a destination for shopping, restaurants and cafes, including pavement cafes. We believe the Village needs a review of air pollution levels at different times of day, year and weather conditions, to establish pollution baselines and confirm what residents know from their personal experience about the need for action to improve air quality. Does the Council have any data on air quality in Blackheath?	An Air Quality Management Area (AQMA) is declared for an area where the local air quality has not met – or is unlikely to meet - the Government's national objectives where there are relevant receptors. Once an AQMA has been declared, further work is undertaken to monitor air quality in this area, and also identify what actions can be implemented to improve the air quality. Air Quality Focus Areas (AQFA) are locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO2) but are also locations with high human exposure. AQFAs are not the only areas with poor air quality but they have been defined to identify areas where currently planned measures to reduce air pollution may not fully resolve poor air quality issues. The Council's Environmental Protection team should be contacted for further information.	No change.
Culverley Green Residents Association	2	SD 06	**Air Pollution and Climate Change** The plan acknowledges and maps the many areas in the Borough which have poor air quality and high levels of air pollution. It refers to NOX and PM 10 but I thought that the current concerns were also about particles down to PM2.5 as being extremely detrimental to health. The recent coroners report about air pollution being a cause of death of the little girl living alongside the South Circular in Lewisham and	The draft Local Plan acknowledges the critical issue of poor air quality in Lewisham and London, and sets out policies to improve air quality in the borough. This includes a requirement for new major development to be at least air quality neutral. To address air pollution associated with vehicles, and particularly private car use, the Local Plan sets the planning framework to deliver on the London Mayor's objective for 90 per cent of all journeys in inner London to	Local Plan amended to require that all new development is at least air quality neutral (rather than

			suggesting that the Council had failed to tackle the problem should have led to more being done in the plan to set out policies and proposals to actively mitigate the problem. Even if these are matters which have to be tackled London wide in conjunction with other bodies the Plan should set out what Lewisham is prepared to do to improve air quality along the worst corridors and in the worst areas. This is particularly important given that a number of the large housing sites and the areas of intensification are in the worst areas or along the worst polluted main road corridors. New housing can mitigate impacts indoors by the use of expensive pollution mitigation solutions but this does not tackle the problem outside. Asthma is an increasing health issue amongst our young children, proactive solutions need to be taken. The ULEZ just makes the south circular worse.	be made by walking, cycling and public transport. As part of this approach, the Local Plan advocates for and seeks that new developments follow the Healthy Streets approach. Point on PM2.5 noted. Lewisham's Air Quality Management Action plan identifies that this type of particulate is detrimental to public health. The Council has and will continue to lobby the London Mayor for the extension of the ULEZ beyond the South Circular.	only major development), in line with the London Plan. Local Plan amended with additional supporting text on Air Quality policy, to state that PM2.5 is a pollutant of concern, as it poses a serious risk to public health.
Deptford Society	2	SD 06	**Page 405** SD6 It is welcome to see Deptford in the Air Quality Focus area, intersecting all three of the local development allocations. Can policy be drafted to include proactive improvements to take air quality (such a tree planting on Deptford High Street) as opposed to reactive policy designed to prevent 'further deterioration' of air quality.	Support noted. Draft Local Plan Urban Greening policy supporting text states that greening measures can help to improve air quality.	Local Plan air quality policy supported text amended to include a cross reference to the Healthy Streets approach.
Greater London Authority	2	SD 06	**Air quality** London Plan Policy SI1 sets out that development proposals must be at least Air Quality Neutral. However, Local Plan Policy SD6 states that this should only apply to major development. This should be re-considered.	Noted.	Local Plan amended to require that all new development must be at least air quality neutral.
Lee Forum	2	SD 06	Lee Green specific 6. Lee Green is an AQMA. We know this because St Modwen's 2020 Leegate scoping report stated that is and Lewisham's 5th March 2020 delegated report reiterated this fact. However, Lee Green is not included in the Local Plan's list of AGMAs and neither is the fact that Lee Green an AGMA mentioned in the Lee Green section of the plan. We request that these two errors are amended.	Figure 11.2 of the Regulation 18 Local Plan document identified that Lee Green falls within an Air Quality Management Area. This will be carried forward to the Regulation 19 document. The Local Plan must be read as a whole and it is not considered necessary to duplicate this information in Part 3 of the plan.	No change.
Lee Forum	2	SD 06	New developments should actively mitigate air quality issues if sited on busy roads or cross roads not merely go for neutrality meaning current levels of pollutants will continue. The plan needs to include much stronger actions to improve current air quality levels.	The draft Local Plan Part 2 transport policies require that new developments follow the Healthy Streets Approach, which includes considerations for improving air quality. These policies with work in conjunction with the standalone air quality policy, and are expected to help to deliver improvements in air quality.	Local Plan air quality policy supporting text amended to include a cross reference to the Healthy Streets approach.
Lee Forum	2	SD 06	The Lee Green cross roads and Lee High Road/Eltham Road should be an Air Quality Focus area. Network for Clean Air	An Air Quality Management Area (AQMA) is declared for an area where the local air quality has not met – or is unlikely	No change.

			measured air pollution levels at 74% above legal levels in 2015. The community at the time asked for this same thing then. It has not happened to date	to meet - the Government's national objectives where there are relevant receptors. Once an AQMA has been declared, further work is undertaken to monitor air quality in this area, and also identify what actions can be implemented to improve the air quality. Air Quality Focus Areas (AQFA) are locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO2) but are also locations with high human exposure. AQFAs are not the only areas with poor air quality but they have been defined to identify areas where currently planned measures to reduce air pollution may not fully resolve poor air quality issues. The Council's Environmental Protection team should be contacted for further information.	
Lewisham Green Party	2	SD 06	**6 SD6 Improving Air Quality – the role of SELCHP in the Local Plan** Air quality is poor across all of London and the Draft Plan recognises the importance of improving the quality of the air breathed by Lewisham residents. As part of efforts to make meaningful improvements to air quality, there is growing opposition to waste incinerators, across much of London, based on the emissions that are created through the incineration process. In May 2019, Sadiq Khan, the Labour Mayor of London wrote that "emissions from incinerators are bad for our health, bad for our environment and bad for our planet" and strongly voiced his opposition to the building of any new waste incinerators in London. Moreover, in aiming to achieve a circular economy, incinerators are increasingly being seen as part of the problems and not part of the solution. Notably, Lewisham is the site of the waste incinerator SELCHP - South East London Combined Heat and Power - owned and managed by Veolia. The Draft Plan, however is completely silent as to any negative impact in respect of air quality, through the emission of particulates and NO2 by the waste incinerator. Instead, the Draft Plan envisages SELCHP playing a key and privileged role in assisting in the roll out of combined heat and power in key parts of the borough over the next 20 years. In response to a Question posed during the Online Consultation process which concludes in April 2021, the Council has written	The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. London Plan policy SI9.C (Safeguarded waste sites) states that "The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost". No suitable alternative sites have been identified and for the time being, the Local Plan must therefore continue to safeguard the site for waste management uses.	Local Plan amended to include a new policy point which seeks to improve the environmental performance of existing waste management facilities.

			that “the South London Combined Heat and Power facility is subject to stringent environmental standards, and levels of emissions from the site are constantly monitored and do not contribute to local air pollution in relation to nitrous oxide or particulate matter.” **In order to allay concerns that might otherwise undermine the public’s confidence in the Plan overall, we would propose that the Council set out in the Plan the data that forms the basis of their view that SELCHP does have not a harmful effect on the air quality of Lewisham. This data will need to have been independently audited and to come from a source independent of the SELCHP provider, Veolia.**		
South East London Labour for a Green New Deal	2	SD 06	In Lewisham, some areas have PM10 (Particular matter) over WHO levels and some are in excess for EU limits for Nitrogen Dioxide. These are often in areas with high levels of deprivation and BAME communities The ULEZ north of the South Circular will temporarily reduce Nitrogen Oxide levels and should be extended across the whole borough. The shift to electric vehicles will do the same. However it will not affect the smaller PM10 pollutants which are caused by friction from car tyres and generated in far greater and more dangerous sizes and quantities by HGVs. These tiny particles lodge in the lungs and children’s development and health can is significantly damaged by these.	Noted. The draft Local Plan acknowledges the critical issue of poor air quality in Lewisham and London, and sets out policies to improve air quality in the borough. To address air pollution associated with vehicles, and particularly private car use, the Local Plan sets the planning framework to deliver on the London Mayor’s objective for 90 per cent of all journeys in inner London to be made by walking, cycling and public transport. As part of this approach, the Local Plan advocates for and seeks that new developments follow the Healthy Streets approach. The draft Local Plan acknowledges and seeks to respond to the issue of Particulate Matter in terms of air quality, including PM10. Lewisham’s latest Air Quality Management Action plan identifies that PM2.5 is also a type of particulate is detrimental to public health. The ULEZ is outside the scope of the Local Plan. However, the Council will continue to lobby the London Mayor / TfL for the extension of the ULEZ beyond the South Circular.	Local Plan amended with additional supporting text on Air Quality policy, to state that PM2.5 is a pollutant of concern, as it poses a serious risk to public health.
South East London Labour for a Green New Deal	2	SD 06	Currently pollution levels are mostly measured by Nitrogen Oxide emissions, ignoring the particulates pollution. This is the case at the Silvertown Tunnel. Silvertown will also have a lane in each direction for buses and HGVs which will increase the number of those high polluting vehicles passing through Lewisham and some areas of the highest deprivation. Particulate pollution can only be tackled by reducing all road vehicles. Some of the busiest and most polluted roads (e.g. the A2 and South Circular) will not become healthy street with the traffic increases predicted from Silvertown.	Noted. The draft Local Plan acknowledges the critical issue of poor air quality in Lewisham and London, and sets out policies to improve air quality in the borough. To address air pollution associated with vehicles, and particularly private car use, the Local Plan sets the planning framework to deliver on the London Mayor’s objective for 90 per cent of all journeys in inner London to be made by walking, cycling and public transport. As part of this approach, the Local Plan advocates for and seeks that new developments follow the Healthy Streets approach. The draft Local Plan acknowledges and seeks to respond to the issue of Particulate Matter in terms of air quality, including PM10. Lewisham’s latest Air Quality Management Action plan identifies that PM2.5 is also a type of particulate is detrimental to public health.	Local Plan amended with additional supporting text on Air Quality policy, to state that PM2.5 is a pollutant of concern, as it poses a serious risk to public health.
The St John’s Society	2	SD 06	Prevention of ‘further deterioration’ of air quality is not enough – improvements are needed.	Noted.	Local Plan Policy SD6 amended to

					require that all development proposals to seek to improve air quality and be at least air quality neutral, in line with the London Plan.
Transport for London	2	SD 06	B - We strongly welcome that new developments are to be air quality neutral. It is important that when assessing emissions from development, consideration is given to car parking as it induces car ownership and use, leading to increased emissions.	Support noted.	No change.
	2	SD 07	FLOOD PLAINS: All new developments on flood-prone areas should be obliged, by law, to build all living quarters above the flood line.	The draft Local Plan Part 2 section on Sustainable Design and Infrastructure includes policies for reducing, mitigating and managing flood risk, which are considered to be consistent with National Planning Policy Framework.	No change.
	2	SD 07	I love the idea of opening up the river but what's the long term risk of flooding?	The naturalisation of a river is a measure used to help alleviate or reduce flood risk. Where rivers cannot be fully re-naturalised, but restoration works to 'open up' the river are involved, flood defence infrastructure may be needed to ensure protection against flood risk. All development proposals will be required to demonstrate that they have adequately addressed flood risk.	No change.
Blackheath Society no 2	2	SD 07	**SD7 Reducing flood risk**. We support the policy aim, which seems sensible. We cannot comment on technical aspects.	Support noted.	No change.
Environment Agency	2	SD 07	**Offsetting development from main rivers** A major source of flood risk comes from development near and over main rivers. The Environment Agency aims to maintain an offset of 8 metres from the top of bank or near edge of a non-tidal main river and 16 metres from the near face of a tidal defence (this includes any buried elements). We would like Section (A) of SD7 to include a reference to the 8 and 16 metre offsets.	Noted.	Local Plan amended to specify requirements on offsets, as recommended.
Environment Agency	2	SD 07	**The Exception Test** The National Planning Policy Framework (NPPF) establishes the requirements of the Exception Test which may be a required consideration for developments within Flood Zone 3. Part b) of this test requires that "the development would provide wider sustainability benefits to the community that outweigh the flood risk". We would like SD7 to include some considerations of what would be considered a development which would provide wider sustainable benefit.	Noted.	Local Plan amended with additional supporting text for considerations on wider sustainability benefits considered in applying the Exception Test.
Environment Agency	2	SD 07	**Flood Zone 3b – functional flood plain** The London Borough of Lewisham uses the Environment Agency's flood modelling to define Flood Zone 3b, in particular the modelled 5% annual exceedance probability. The Strategic Flood Risk Assessment's (SFRA) Appendix A includes a map of	Noted.	Local Plan amended with additional supporting text on Flood Zone

			Lewisham, indicating where the various flood zones are located. However, this does not provide sufficient detail to accurately decide whether a proposed development sits within Flood Zone 3b. We would like an additional 'Explanation' paragraph to be included, summarising the impact on planning Flood Zone 3b has and to request developers contact the Environment Agency to receive site specific flood model outputs to better understand the flood risk. The functional flood plain map is an essential tool to direct new development away from the highest risk areas and ensure land use planning decisions are based on the latest evidence and climate change data. The proposed site allocations should then be assessed using the latest functional flood zone map for Lewisham. Flood Zone 3B – Functional floodplain This zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency.		3b and to advise applicants to consult EA for site specific model outputs.
Port of London Authority	2	SD 07	**6. Policy SD7: Reducing Flood Risk.** Support the reference within the policy to the Thames Estuary 2100 plan	Support noted.	No change.
Quaggy Waterway Action Group	2	SD 07	The Council will seek to **reduce flood risk and ensure resilience** against the impact of flooding by: a. Using a sequential approach to the location of new development to **avoid, where possible, flood risk to the population and property** whilst taking account of the long term impact of climate change; b. **Directing new development to those areas of the Borough that are at the lowest risk** of flooding, having regard to Lewisham's Strategic Flood Risk Assessment (SFRA), by applying the Sequential and Exception Tests in accordance with national planning policy; c. **Requiring that all new development does not increase flood risk in the Borough**, reduces the risk of flooding from all sources and is designed to remain safe and operational under flood conditions; d. Working in partnership with stakeholders to implement the flood risk management actions in the Thames Estuary 2100 Plan; and e. **Seeking that new development maximises opportunities for river restoration, in line with Lewisham's River Corridors Improvement Plan SPD** B "A **site specific Flood Risk Assessment will be required for all development proposals within Flood Zone 2, 3a and 3b, all major development in Flood Zone 1, and elsewhere in the**	Noted. Flood resistant and flood resilient design are embedded within the Government's National Planning Practice Guidance. This provides that policies should seek to avoid and reduce flood risk, whilst ensuring development is flood resistant and/or resilient where flood risk cannot be avoided.	No change.

			Borough where development may be at risk of other sources of flooding. The assessment must provide sufficient evidence for the Council to assess whether the requirements of the Sequential and Exception." **QWAG comments:** Seeking to reduce flood risk while ensure resilience are in contradiction. The Council has the tools to know how developments will affect flood risk and so have the means to ensure that any development activity contributes to lowering flood risk as well as increasing resilience.		
Greater London Authority	2	SD 08	**Sustainable Drainage** The Mayor welcomes the reference to the drainage hierarchy (London Plan Policy SI 13 B), but the reference to the Sustainable Design and Construction SPG is outdated - in particular the reference to the 50% run-off rate reduction should be removed, given that the above-mentioned London Plan Policy supersedes this and clearly focuses on aiming to achieve greenfield run-off rates.	Noted.	Local Plan amended as suggested, to refer to aim for greenfield run-off rate, as suggested.
Quaggy Waterway Action Group	2	SD 08	A "Development proposals should aim to achieve greenfield runoff rates and ensure that surface water runoff is managed as close to its source as possible. **Sustainable Drainage Systems (SuDS) should be incorporated into new development wherever possible, with priority given to green and blue over grey features, in line with the London Plan drainage hierarchy**, as follows: a. Rainwater use as a resource. b. Rainwater infiltration to ground at or close to source. c. Rainwater attenuation in green infrastructure features for gradual release. d. Rainwater discharge direct to a watercourse, unless not appropriate. e. Controlled rainwater discharge to a surface water sewer or drain. f. Controlled rainwater discharge to a combined sewer." B "All SuDS will be required to meet the Department for Environment, Food and Rural Affairs'' Non-Statutory Technical Standards. They should also be designed to reflect guidance and principles set out in the London Plan Sustainable Design and Construction SPD and the SuDS Manual. In addition, all SuDS should: a. Be located and designed having regard to the London Sustainable Drainage Action Plan along with the Council's Surface Water Management Plan and Local Flood Risk Management Strategy; b. Be sensitively integrated into the development; c. Maximise opportunities to enhance biodiversity and local amenity; d. Improve the quality of water discharges, with provision for clean and safe water at the surface; and e. Function effectively over the lifetime of the development.	Noted. The policy seeks to ensure that permeable surfaces are integrated wherever possible. However, there are Permitted Development rights which allow the paving over of front gardens and driveways, over which the Council exercises no control.	Local Plan amended to include reference to Ravensbourne Catchment Improvement Plan.

			C “All proposals for major development and development within a Critical Drainage Area must achieve a greenfield runoff rate and volume leaving the site, as demonstrated through a Drainage Strategy. All other development will be expected to achieve at least a 50% reduction in existing runoff rates. Where a greenfield runoff rate cannot be achieved, or SuDS cannot be implemented due to reasons of technical feasibility or financial viability, proposals must demonstrate that: a. Surface water runoff (both in terms of volume and flow) has been reduced as much as reasonably practical; and b. Measures to improve water quality have been investigated and implemented, wherever feasible. D “Development proposals should be designed to **include permeable surfaces** wherever possible. Proposals **for impermeable paving, including on small surfaces such as front gardens and driveways, will be strongly resisted** unless it can be suitably demonstrated that this is not technically feasible or appropriate.” **QWAG comments:** QWAG supports many of the aspirations set out in this section although it is not clear how the aims will be delivered when get out clauses are so easy to effect. Large swathes of the borough’s front gardens have been lost adding to urban heating, surface water run off, pressure on drainage system, increased pollution or ground and surface waters and heightened flood risk. It is not at all clear how the Council and the Plan will ensure that this becomes the exception, not the rule. This section should also give due weight to the Ravensbourne Catchment Improvement Plan and its list of projects.		
Thames Water Utilities Ltd	2	SD 08	SD8 – Sustainable Drainage Flood Risk In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.	Noted. Policy SD8 refers to all sources of flooding, and the supporting text specifically refers to sewer flooding.	Local Plan amended with additional policy supporting text on water drainage, as suggested.

			Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits. With regard to surface water drainage, Thames Water request that the following paragraph should be included in the new Local Plan: **"*It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding*."**		
Thames Water Utilities Ltd	2	SD 08	Basements – Sewage flooding Thames Water's main concerns with regard to subterranean development are: 1) The scale of urbanisation throughout London is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water's sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network. 2) By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as	Noted.	Local Plan basement development policy amended with additional policy criterion for installation of a suitable (positively) pumped device, as suggested.

			blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows. The policy should therefore require all new basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. Clearly this criterion of the policy will only apply when there is a waste outlet from the basement i.e. a basement that includes toilets, bathrooms, utility rooms etc. Applicants should show the location of the device on the drawings submitted with the planning application.		
	2	SD 09	p347 10 Green Infrastructure Note - In scrolling further through this enormous document I found a substantial section on Rivers in Water Management (P417 SD9). Many comments below refer to our rivers which are very important. I am leaving my volunteer colleagues in QWAG to investigate and comment on that section	Noted.	No change.
	2	SD 09	P417 SD9 Water Management In this section there are no images of our wonderful rivers! I am sure there are some copyright free ones in your libraries. I shall leave comments on this section to my QWAG colleagues.	Noted. Graphics and images are provided for illustrative purposes only. The Council will consider opportunities to update the presentation of the Local Plan.	No change.
Environment Agency	2	SD 09	SD9 (Water Management) part A paragraph b. refers to setback and states that adequate set back distance must be agreed with the council and the Environment Agency. We would like this to be updated provide 8 metres (main rivers) 16 metres (Tidal) of setback as appropriate or otherwise agreed by the Council and the Environment Agency.	Noted.	Local Plan amended to specify requirements on offsets, as recommended.
Environment Agency	2	SD 09	**Riparian Ownership of a main river** SD9, section A paragraph d. mentions the surveying and, if necessary, carrying out of repairs/maintenance. We would like this wording to be strengthened to highlight the requirements of a riparian owner. The development of a site offers a unique opportunity to repair main river assets. For a development which may have a design life of decades, it would be appropriate to carry out works to ensure the flood defences and other watercourse infrastructure are safe across this time period.	Noted.	Local Plan amended to specify requirements for riparian owners, including raising of Thames Tidal Defences where appropriate.
Environment Agency	2	SD 09	The River Corridors Improvement Plan SPD should be updated to reflect new guidance on Biodiversity Net Gain, where development affects rivers. This is important because the information within the current Local Plan doesn't clearly reflect the need to consider rivers using the BNG metric for rivers. The metric provides very challenging requirements for new	The River Corridors Improvement SPD is outside the scope of the Local Plan. The Council may in the future review and update this guidance. A new Biodiversity Action Plan is currently being prepared by the Council, which will consider actions required to achieve BNG. Support for policies on water efficiency noted.	No change.

			development that developers will need to take into account at the earliest stages of site acquisition and design. We welcome Policy SD9 section F (p418) and in para 11.62 (p421) the requirement for domestic development to achieve the higher standard of water efficiency. This is normally quoted as 110 litres per person per day including 5 for external use (as for instance in the Sustainability Appraisal Scoping Report). Similarly, we welcome the requirement for major non-domestic development to achieve the BREEAM Excellent standard, and in para 11.62 consideration of grey water re-use and rainwater harvesting systems.		
Environment Agency	2	SD 09	**Groundwater protection** Proposals for development within the Groundwater Source Protection Zones identified on the Policies Map should only be permitted if there is no risk of contamination to groundwater sources. If a risk is identified, development should only be permitted if adequate mitigation measures can be implemented. Proposals for Sustainable Drainage systems involving infiltration must be assessed and discussed with the Environment Agency to determine their suitability in terms of the impact of any drainage into the groundwater aquifer. Any developments with proposals for piled foundations must take account of disturbance of any ground to cause turbidity in water supply and to prevent creating pathways for contamination materials to reach the groundwater beneath any sites impacted by contamination or landfill.	Noted.	Local Plan amended with a new standalone policy on Wastewater and water supply, based on the Reg18 policies on this matter. Local Plan amended to clarify that proposals should not adversely impact on groundwater sources. Local Plan amended to include a new criterion on SuDS, as recommended. Local Plan amended with a new criterion on piled foundations within the new policy on wastewater and water supply.
Environment Agency	2	SD 09	**Section SD9 under Water Management, sub sections Water Quality and Wastewater**	Support noted.	No change.

			We are pleased to note that all proposed developments should seek to improve water quality and must ensure that there is no deterioration in the quality of a watercourse or groundwater. We note that specific reference has also been made with regards to potential risks of new developments in Source Protection Zones and that there should be no unacceptable risk to groundwater quality. The proposals to support connection to mains drainage and to repair misconnections is acceptable to the Environment Agency as this will ensure risk to controlled waters will be appropriately managed and remediated. We are pleased to note that the Council will seek to restrict the use of non-mains drainage for foul water disposal, particularly in Source Protection Zones.		
Greater London Authority	2	SD 09	**Safeguarded Wharf** The new safeguarding Direction for Convoys Wharf was published on 1 March 2021. The references in particular in Policy SD9(I) should be updated to reflect this.	Noted.	Local Plan amended to reflect the new safeguarding Direction for Convoys Wharf, as suggested.
London Borough of Tower Hamlets	2	SD 09 DM 04	Waterfront Management/Development Waterfront management is one of the biggest priorities for cooperation between Lewisham and Tower Hamlets as we share a water border across the Thames. View management is a particularly important aspect for Tower Hamlets, particularly across the Thames to Canary Wharf and the Isle of Dogs. The Tall buildings policy for this area should ensure that the primacy of iconic buildings in Tower Hamlets is considered in any applications in line with view management frameworks. The redevelopment of the Lewisham Thames Waterfront is encouraged in line with policy as it is an excellent opportunity area for housing, employment and entertainment. Tower Hamlets have been focussing on Thames waterfront development around the Isle of Dogs, St. Katherines Dock, etc. to unlock development potential and improve the public realm. While these waterfront sites are being redeveloped, councils need work together to ensure that there are no environmental repercussions in terms of construction waste and noise disturbance, particularly as the Thames is a shared asset amongst many boroughs. This message should be reinforced where possible in the Lewisham Local Plan.	Noted. The Council has and will continue to engage with and consult Tower Hamlets through the Duty to Cooperate.	Local Plan policy on tall buildings amended to refer to need for development proposals to consider impact on other boroughs.
London Wildlife Trust	2	SD 09	We welcome and support this policy. In supporting para 11.63, most of the waterbodies are identified as Sites of Importance for Nature Conservation (Policy GR3), and in para 11.66 we suggest that the relevant	Support noted.	Local Plan supporting text amended to refer and encourage

			river catchment partnerships are engaged in consultation too (e.g. Your Tidal Thames, Ravensbourne CIG).		consultation with relevant river catchment partnerships.
Port of London Authority	2	SD 09	Thank you for consulting the Port of London Authority (PLA) on the Regulation 18 consultation of the London Borough of Lewisham's Local Plan which sets out to establish a future vision for Lewisham, along with a planning and investment framework to deliver the boroughs vision over a 20-year period (2020 to 2040). I have now had the opportunity to review the consultation documents and have the following comments to make. For information, the PLA is the Statutory Harbour Authority for the Tidal Thames between Teddington and the Thames Estuary. Its statutory functions include responsibility for conservancy, dredging, maintaining the public navigation and controlling vessel movements and its consent is required for the carrying out of all works and dredging in the river and the provision of moorings. The PLA's functions also include for promotion of the use of the river as an important strategic transport corridor to London. The PLA's Vision for the Tidal Thames (2016) (the "Thames Vision") must be considered as part of the new Local Plan. The Thames Vision is the framework for the development of the Tidal Thames between now and 2035 and was developed with a range of stakeholders (http://www.pla.co.uk/About-Us/The-Thames-Vision). The Vision sets six goals for the long-term future of the Tideway: more trade and more jobs associated with the River Thames; improved use of the River for the transportation of freight and passengers; greater participation in sport and recreation; an improved environment and river heritage and; more people enjoying the Thames and its banks. In addition the PLA has also published its first Air Quality Strategy (AQS) for the Tidal Thames (2018) (https://www.pla.co.uk/assets/airquality2018.pdf) which must also be considered as part of the new Local Plan evidence base. This strategy aims to reduce river-based air pollution on the tidal Thames between Teddington and Southend, whilst facilitating the future growth of waterborne freight and passenger transport in line with the aims of Thames Vision and includes several actions to implement the strategy. The AQS must be referenced as part of any policies with regard to improving air quality in the borough, particularly through promoting the use of the river as part of new development proposals.	Noted.	Local Plan amended to include references to the Vision for the Tidal Thames. Local Plan amended to include reference to PLA Air Quality Strategy in supporting text of Air quality policy, as suggested.
Port of London Authority	2	SD 09	**7. Policy SD9: Water Management.** With regard to the safeguarded Convoys Wharf, to confirm the review of London's safeguarded wharves has recently been completed by the Mayor of London and on the 19 February	Support noted.	Local Plan amended to appropriately reflect

			2021 the updated Ministerial Directions were issued by the Secretary of State which include for the continued safeguarding Convoys Wharf, with a reduced boundary reflecting the extant planning permission for the overall site and the associated S106 agreement for the site (Ref: DC/13/83358). This reiterates that this wharf remains viable for waterborne freight cargo handling and the PLA would emphasise the requirement for the site owners and partners, including the PLA to expeditiously progress with reactivation of the wharf in line with the permission. This must be reflected in this policy. As part of this part I of policy SD9 must be updated to the following: *"Convoys Wharf is included within London's network of safeguarded wharves. The Council will continue to safeguard Convoys Wharf taking into account* ***the ministerial safeguarding direction of the wharf and*** *extant planning consents and any future safeguarding Direction. Development proposals involving water transport at Convoys Wharf will be considered* ***supported*** *having regard to draft London Plan Policy SI15 (Water transport), along with other relevant policies"* Supporting paragraph 11.64 must be updated to reflect the current position with regard to the Ministerial Safeguarding Direction of the wharf. Specific reference must also be given in this policy on the need for adjacent and nearby development proposals to be designed to minimise the potential for conflicts of use and disturbance, in line with the Agent of Change principle and London policy SI15, which specifically refers to the importance of this, including for vacant wharves, to ensure that the long term use and viability of the safeguarded wharf, which could operate over 24 hours a day in line with the tides is not constrained. In addition, reference on the need to ensure adjacent development is designed to minimise the conflicts of use and disturbance, in line with the agent of change principle must also be specifically highlighted in the site allocations sections for Convoys Wharf, and the adjacent Timber yard at Oxestalls Road site located to the south west of the safeguarded wharf boundary. With regard to supporting paragraph 11.65 on the councils support for the Lenox project 'consistent with extant planning consent at this strategic development site'. As has been noted through the GLA's Safeguarded Wharves Review 2018-2019 consultation, the primary use of a safeguarded wharf is for the handling of waterborne freight, and an historic ship building site is not considered a water-borne freight handling use. Therefore in line with the extant planning consent and London Plan policy SI15 any proposed alternative development at the safeguarded wharf must first robustly justify why the site no	The Local Plan will be amended to appropriately reflect provisions on the Ministerial Safeguarding Direction for Convoys Wharf.	provisions on the Ministerial Safeguarding Direction for Convoys Wharf, along with additional recommendations for changes to the policy supporting text. Local Plan amended as suggested: to include reference to Estuary Edges guidance document; to include reference to recreational uses as appropriate uses on waterways; to refer to encourage developers to engage with relevant bodies on applications adjacent to waterways.

			longer viable or capable of being made viable for waterborne freight. Supporting paragraph 11.65 must therefore be updated to reflect this policy position and also highlight the importance of the need to reactivate the wharf for waterborne freight cargo handling which is also consistent with the extant planning permission. Support part A, on the various requirements that development proposals on sites containing or adjacent to a main river or ordinary watercourse should consider, including the reference to the Marine Management Associations (MMO) South East Marine Plan and on the need for developments to incorporate measures to enhance the ecological, amenity, recreational and historic value of water spaces. In order to strengthen this it is recommended that further information is provided on the South East Marine Plan, which is due to be adopted in 2021 is provided within the supporting text. Furthermore, with any proposed development along the riverside consideration should be given to the Estuary Edges guidance co-ordinated by the Thames Estuary Partnership which contains guidance on features that support wildlife and improve access when reconstructing or refurbishing the banks of the estuary. (https://www.estuaryedges.co.uk). This must be referred to in the supporting text of the policy to support part A. Support part G with regard to the need for development proposals to identify and respond positively to the unique attributes of waterways, including on the potential to facilitate water transport. To strengthen this part of the policy it is considered that the potential to facilitate water transport is expanded to promote both passengers and freight transport, in line with London Plan policy SI15. Support part H, which refers to the Thames Policy Area within Lewisham, and part J, with regard to the support for water and marine based development in line with the list of criteria in sections J(a) to (g). However part J should be amended to include “residential, commercial, community, **recreational** and transport uses”. In addition the PLA’s Thames Vision highlights the southern part of Deptford Creek as a potential Residential Mooring Opportunity Zone. The potential for the use of Deptford Creek for additional residential moorings, adding to the character of the boroughs waterways in line with local and regional planning policies should form a consideration as part of this policy. Support the reference in supporting paragraph 11.66 on the need for applicants to consult with relevant authorities including the PLA where new development is proposed on or		

			within a waterway but consider this should be amended to also refer to development located adjacent to waterways as well. Support the inclusion of figure 11.4, which shows the current safeguarded wharf boundary for Convoys Wharf, and the proposed amendment to the policies map, reflecting the current ministerial safeguarding direction boundary for the wharf. Support the reference in supporting paragraph 11.60 with regard to the Thames Tideway Tunnel project and that the council will continue to work with stakeholders to secure the delivery of this strategic infrastructure.		
Port of London Authority	2	SD 09	On other matters with regard to policy SD9, it is considered that the policy must be expanded to include a specific reference to the vital need to provide appropriate riparian life saving equipment (such as grab chains, access ladders and life buoys) alongside riverside areas to a standard recommended in the PLA's 'a safer riverside' guidance (2020) for developments on and alongside the Tidal River Thames, which supports the 1991 Hayes Report on the Inquiry into River Safety. The PLA also considers that there is need for suicide prevention measures in appropriate locations (such as CCTV and signage with information to access support) to be provided as part of new development along the riverside. This is supported by the recently published Drowning Prevention Strategy (2019) produced by the Tidal Thames Water Safety Forum (including the PLA, RNLI and emergency services) and this should also be referenced within this policy. Both of these documents can be found at https://www.pla.co.uk/Safety/Water-Safety/Water-Safety.	Noted.	Local Plan amended in line with suggestions.
Quaggy Waterway Action Group	2	SD 09	**SD9 Water management** **Watercourses and flood defences, page 417** A "Development proposals on sites containing or adjacent to a main river or ordinary watercourse will be required to: a. Demonstrate how the objectives of the Thames River Basin Management Plan, London River Restoration Action Plan, Marine Plan for the South East and other relevant local guidance, including the **River Corridors Improvement Plan SPD**, have been taken into account; b. **Ensure that there is no adverse impact on the natural functioning of the watercourse, including by maintaining an undeveloped buffer zone with an adequate set back distance from the watercourse, as agreed with the Council and the Environment Agency**; c**. Investigate and maximise opportunities to enhance or restore river channels, flood flow pathways, floodplains and other natural flood management features with the objective of returning them to their natural state wherever possible;** d. Where appropriate, provide a **condition survey of existing flood defence and other watercourse infrastructure** and if	Noted.	Local Plan amended to include reference to Ravensbourne Catchment Improvement Plan.

			necessary, provide for maintenance, repairs or remediation to secure the functional integrity of this infrastructure over the lifetime of the development; and e. **Incorporate measures to enhance the ecological, amenity, recreational and historic value of water spaces, including by enhancing public access to these spaces.** **QWAG comments** This section should give due weight to the Ravensbourne Catchment Improvement Plan and its list of projects. The Council says it wants to work with the community but the Plan fails to recognise the considerable local knowledge and expertise that exists outside of the Council and the Environment Agency.		
Quaggy Waterway Action Group	2	SD 09	**Water quality** B "All development proposals should seek to improve water quality and must ensure that there is no deterioration in the quality of a watercourse or groundwater, in line with the European Water Framework Directive 2000." C "Where development is proposed within a Source Protection Zone it must not result in an unacceptable risk to groundwater quality." **Strategic role of waterways, page 418** G "Waterways provide multifunctional social, economic and environmental benefits that support sustainable communities. Development proposals should identify and respond positively to the unique attributes of waterways, giving particular consideration to their: a. Environmental function and ecological qualities; b. Contribution to the Borough's network of open spaces; c. Recreational and amenity value; d. Distinctive features that help to shape and reinforce the Borough's physical, cultural and historical character; e. Support for the visitor economy; and f. Potential to facilitate water transport" **Paragraph 11.52, page 419:** "**The Council has recently worked with the Environment Agency and other partners to deliver investment in river corridor improvements as part of its ongoing regeneration programme. This includes works along the Rivers Ravensbourne and Quaggy to provide improved defences and dedicated landscaped areas for flood storage, local amenity and improved biodiversity. These schemes have demonstrated that it is possible to put rivers back at the heart of new development and we aim to continue building on these successes."** **QWAG comments:** As stated elsewhere, this section should also give due weight to the Ravensbourne Catchment Improvement Plan and its list of projects.	Noted. The draft Local Plan is considered to provide a strategic approach to water management which is consistent with national planning policy and in general conformity with the London Plan.	Local Plan amended to include reference to Ravensbourne Catchment Improvement Plan.

			The Council says it wants to work with the community, but the Plan fails to recognise the considerable local knowledge and expertise that exists outside of the Council and the Environment Agency. The Council's statement about the role of rivers is welcome but it underplays the role of rivers in the climate and biodiversity aims. A far more precise section is required based on a proper ecological assessment of the rivers and waterbodies and their potential to contribute to other aims if their potential is realised. To date, the policy has been to seek to secure river improvements when development occurs. That has not always delivered (as this submission sets out above) and major opportunities have been lost. The Plan needs to take a far more proactive approach to river restoration – one that is not dependent on the vagaries of developers bringing forward plans.		
Thames Water Utilities Ltd	2	SD 09	SD9 – Water Management We support Policy SD9 and the specific section on water and wastewater at sections D-F. We also support the specific text on water and wastewater at supporting paragraphs 11.57-11.62 Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure. Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure. A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for… infrastructure for waste management, water supply, wastewater…" Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific	Support noted.	Local Plan amended to include new standalone policy on water supply and wastewater, in order to make clearer the requirements around this type of infrastructure.

			areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure…" Paragraph 26 of the revised NPPF goes on to state: "*Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary….*" The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "*Adequate water and wastewater infrastructure is needed to support sustainable development*" (Paragraph: 001, Reference ID: 34-001-20140306). Policy SI5 of the new London Plan relates to water and wastewater infrastructure and supports the provision of such infrastructure to service development. It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years. The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling. As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water's charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers		

			(requisitions), traffic management costs, income offsetting and infrastructure charges. Information on how off site network reinforcement is funded can be found here https://developers.thameswater.co.uk/New-connection-charging Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following: - The developments demand for water supply and network infrastructure both on and off site; - The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and - The surface water drainage requirements and flood risk of the development both on and off site and can it be met. Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at: https://www.thameswater.co.uk/preplanning In light of the above we support Policy SD9 and supporting paragraphs in this respect.		
Thames Water Utilities Ltd	2	SD 09	Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies' AMP8 Business Plan will be agreed with Ofwat during 2024. We therefore request that the new Local Plan include the following policy/supporting text: "***The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised***."	Noted.	Local Plan amended to include new standalone policy on water supply and wastewater, in order to make clearer the requirements around this type of infrastructure. The policy supporting text refers to the short term period of AMPs and acknowledges the need to plan positively for this type of

					provision, where development complies with other policies.
Thames Water Utilities Ltd	2	SD 09	SD9 F – Water Management - Water Efficiency/Climate Change We fully support the aims of Policy SD9 F in relation to water efficiency, but consider that the section needs strengthening. The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy. Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link: https://www.thameswater.co.uk/Be-water-smart It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations. Proposed policy text: **“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water**	Noted.	Local Plan policy on water efficiency amended to refer London Plan standards, which take forward suggested standards. An additional policy point has also been include to set out that planning conditions may be used.

			consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met."		
Thames Water Utilities Ltd (Property)	2	SD 09 Para 11.60	Tideway in Lewisham There are two main TTT sites within the London Borough of Lewisham. The Tideway works at **Earl Pumping Station** will intercept the Earl Pumping Station CSO (Combined Sewer Overflow). This will convey the flows from the existing sewer to the new Greenwich connection tunnel which in turn connects to the main tunnel at Chambers Wharf (in London Borough of Southwark). Flows will be transferred from the relatively shallow depth of the Earl Pumping Station CSO to the deeper level of the Greenwich connection tunnel via a drop shaft approximately 50 m deep. For hydraulic reasons, the CSO drop shaft and valve chamber need to be finished above ground level. The area around the shaft would be finished with hardstanding to enable cranes to access the covers on top of the shaft. At **Deptford Church Street** a similar CSO drop shaft will be constructed and connected to the long connection tunnel from Greenwich Pumping Station to Chambers Wharf. As a key principle, proposed development must not be allowed unless it can be demonstrated that the development would not adversely affect the construction of the Thames Tideway Tunnel and/or the operational and maintenance works and access required over the lifetime of the Thames Tideway Tunnel infrastructure. Additionally, Thames Water assets must be protected for their future operation. We would ask that a sentence is added to paragraph 11.60 to confirm this.	Noted.	Local Plan amended to refer the infrastructure projects and clarify that development proposals must ensure not adverse impact on their operation.
	2	SD 10	South East London Combined Heat and Power (SEPCHP) is a processing plant for rubbish servicing much of the South East. In reality the SELCHP is an incinerator pumping toxic gasses and particulates into the air of New Cross Gate. In the Hatcham Society's response the LLP it states: "the latest figures released by the government's Environment Agency for 2019, that SELCHP reported a release of 361,665,000 kg of Carbon Dioxide and 144,818,000 kg of Carbon Dioxide from Qualifying Renewable Fuel Sources. Meanwhile, there was 566, 632 kg of Nitrogen Oxides released last year. Nitrogen Oxides include Nitrogen Dioxide, a harmful gas which damages lungs. " It goes on to say that : "The amount of Carbon Dioxide released from SELCHP was 3.3 times more than what was released from the Edmonton Solid Waste Incinerator in 2019 and SELCHP released 2.5 times more	The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. London Plan policy SI9.C (Safeguarded waste sites) states that "The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost". No suitable alternative sites have been identified and for the time being, the Local Plan must	Local Plan amended to include a new policy point which seeks to improve the environmental performance of existing waste management facilities.

			Nitrous Oxides than the Edmonton Solid Waste Incinerator. We also do not know the amount of Carbon Dioxide released through the burning of 'biogenic Co2' - food waste - as highlighted in Channel Four's Dirty Truth About Your Rubbish: Dispatches (March 2021). A report titled 'Health Effects due to Emissions from Energy from Waste Plant in London' created for the GLA published in May 2020 found that SELCHP had the highest NOx emission rate out of London's incinerator plants. " I support the advances in rubbish recycling over the last few years however the role of SEPCHP and its relationship with the Lewisham Local Plan need to be re-examined and should not, as is stated in the LLP, be safeguarded. A full enquiry should be initiated into the role of SELCHP in our community and a clear and accessible publication of all data relating to processing waste. This has to include: Any breaching of toxin levels emitted by the plant Efficiency in terms of the quantity of material that is processed there A clear indication of the weekly source of the material being processed An inability to clarify SELCHP's role in polluting the air in New Cross and the surrounding area frankly makes a mockery of any green aspiration's asserted in the LLP. I cannot see how homes can be built in such close proximity to the incinerating plant. Lewisham in their North area Plan looks to "safeguard strategic waste management sites including SELCHP" while promoting the redevelopment of Millwall Football stadium adjacent to SELCHP with 2,500 new homes planned. This means that home building is ear marked by the LLP in close proximity to a known emitter of toxic gasses and hazardous particulates.	therefore continue to safeguard the site for waste management uses.	
Blackheath Society no 2	2	SD 10	**SD10 Ground conditions**. We support the policy aim, which seems sensible.	Support noted.	No change.
Environment Agency	2	SD 10	We note that land contamination has been identified within Section SD10 and that developments must demonstrate that associated risks should be adequately addressed. Sites suspected of being contaminated will be required to submit a preliminary risk assessment as a minimum. This is in agreement with our recommendations above.	Support noted.	No change.
Environment Agency	2	SD 10	**Contamination** Development proposals that would enable contaminated sites to be brought into beneficial use should normally be permitted, so long as the sites can be rendered suitable for the proposed end use in terms of the impact on human health, public safety	Noted. The plan will be amended in line with the recommendations. Key tests on site investigations and assessments are already included in the Local Plan Regulation 18 document.	Local Plan amended to clarify that development proposals that would enable

			and the environment, including underlying groundwater resources. Development on land known or suspected to be contaminated or likely to be adversely affected by such contamination should only be permitted where: 1) An appropriate site investigation and assessment (agreed by the Council) has been carried out as part of the application to establish whether contamination is present and to identify any remedial measures necessary to ensure that the site is suitable for the proposed end use; 2) The proposed remedial measures would be acceptable in planning terms and would provide effective safeguards against contamination hazards during the development and subsequent occupation of the site. Planning conditions will be attached to any consent to ensure that remedial measures are fully implemented, before occupation.		contaminated sites to be brought back into beneficial use will be supported provided there will be no adverse impact on human health, public safety and the environment. Local Plan amended to clarify that planning conditions may be used to ensure remedial measures are fully implemented.
	2	SD 11	Polluting Industry Reduce the number of trucks coming to the area by changing the use class of industrial and waste processing sites like scrapyards and private waste processing. Support low pollution industries that create jobs for local people in healthy environments.	Noted. The London Plan designates Strategic Industrial Locations (SIL) in parts of the Borough where commercial and general industrial uses are acceptable in principle. In addition, London Plan policy SI9.C (Safeguarded waste sites) states that "The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost". In light of the above, it is challenging for the Local Plan to enable significant change uses in designated SIL and safeguarded waste sites. However, the plan does support a transition to lighter industrial uses that are more compatible with residential uses in Locally Significant Industrial Sites and other employment locations.	Local Plan Part 1 strategic objectives amended to signpost support for green industries and transition to low carbon, circular economy.
	2	SD 11	SELCHP is proposed as an integral part of the Local Plan. Waste incinerators are usually located in the most deprived neighbourhoods this is socially unjust. Furthermore, by 2035, incineration will be a more carbon-intensive process than even landfill. Remove SELCHP as a priority and shut it down so the borough can meet its climate emergency targets.	Noted. The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. London Plan policy SI9.C (Safeguarded waste sites) states that "The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is	Local Plan amended to include a new policy point which seeks to improve the environmental performance of existing waste management facilities.

				made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost". No suitable alternative sites have been identified and for the time being, the Local Plan must therefore continue to safeguard the site for waste management uses.	
	2	SD 11	I support the advances in rubbish recycling over the last few years however the role of SEPCHP and its relationship with the Lewisham Local Plan need to be re-examined and should not, as stated in the LLP, be safeguarded. "The amount of Carbon Dioxide released from SELCHP was 3.3 times more than what was released from the Edmonton Solid Waste incinerator in 2019 and SELCHP released 2.5 times more Nitrous Oxides than the Edmonton Solid Waste Incinerator. We also do not know the amount of Carbon Dioxide released through the burning of 'Biogenic Co2 ' – food waste – as highlighted in Channel Four's Dirty Truth About Your Rubbish: Dispatched (March 2021). Report titled 'Health Effects due to Emissions from Energy from Waste Plant in London' created for the GLA published in May 2020 found that SELCHP had the highest NOx emission rate out of Lond0n's incinerator plants.	Noted. The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. London Plan policy SI9.C (Safeguarded waste sites) states that "The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost". No suitable alternative sites have been identified and for the time being, the Local Plan must therefore continue to safeguard the site for waste management uses.	Local Plan amended to include a new policy point which seeks to improve the environmental performance of existing waste management facilities.
	2	SD 11	The situation particularly with flats results in accumulation of unsightly unhealthy waste, overflowing bins and obstruction of the Highway. The regular Bin Collections are a source of litter and obstructions. The Grey insecure food waste bins are emptied into Brown Garden Waste ones and heat treated together. The bins are rarely returned to the perimeter and left sideways open. If the system is not going to be altered, then a rethink is needed. Obviously not everyone has a Brown bin to put food waste in. The Green and Black Bins are rarely returned to the perimeters and often left as chicanes along the pavements. Both Lewisham and Greenwich have different systems	Noted. The draft Local Plan includes new standards and policies to help ensure that waste management and recycling facilities are provided in new developments, and that these are appropriately considered through the design-led approach. However, waste management and recycling services are outside the scope of the Local Plan.	No change.
	2	SD 11	Limit the trucks in Mercury Way. Residents have no pavement access due to ongoing scrap/waste disposal. Roads are in an awful state due to the amount of heavy traffic. Life for residents is awful and there is a school nearby as well.	Noted. The area around Mercury Way includes safeguarded waste sites and London Plan Strategic Industrial Locations (SIL) where commercial and general industrial uses are supported in principle. In order to support the viability of these employment locations there will invariably be some level of commercial vehicle movement. Where opportunities areas, the Council will seek to improve the public realm within this area, as the Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport	No change.

				modes are central to the Local Plans ambitions and policies and are set out clearly in Part 2 Transport policies.	
	2	SD 11	The plan states on a number of occasions how Lewisham was an early adopter of efforts to tackle climate change. The plan highlights the GLA mantra and hierarchy of clean green lean etc. and admits that its waste recycling is one of the worst in London.	Noted. The draft Local Plan includes a refreshed suite of waste management policies in response to the issues identified.	No change.
Blackheath Society no 2	2	SD 11	**SD11 Reducing and managing waste**. We support the policy aim, which seems sensible, and the concept of the circular economy. In our view, A is two separate sub-policies: the first sentence is the overarching general policy; the second sentence is the policy in respect of development proposals. We are surprised that there is no measurable Plan target cited here or in DM5 for waste reduction.	Support noted.	Local Plan Part 4 monitoring framework amended to include additional monitors on waste management and recycling, in line with targets set out in Lewisham Waste Management Strategy 2021-2031.
Environment Agency	2	SD 11	It's important the main LB of Lewisham waste management and recycling centre is assessed to ensure it has the capacity and adequate infrastructure to serve the rising number of households across the borough for the lifetime of the plan. If the site does not have capacity a plan and funding strategy should be identified to deliver a new waste management site for the borough to serve the increased demand from the rising number of residents. London Borough of Lewisham Lewisham Recycling & Waste Reception Centre, Landmann Way, New Cross, London, SE14 5RS **ZP3290EQ/V002**	The South East London Joint Waste Technical Paper demonstrates that Lewisham has identified sites with sufficient capacity to meet the London Plan waste apportionment. The Council's Waste Service will continue to review the specific requirements arising in the local authority area for managing different types of waste streams. Further information is included in the Infrastructure Delivery Plan and Waste Management Strategy.	No change.
Environment Agency	2	SD 11	**SD11 Reducing and managing waste** We welcome this policy and support the need for well planned and modern waste management infrastructure to ensure waste is well managed and does not cause any amenity issues such as excessive odours, dust or noise. If waste sites are not compliant with planning and permitting regimes we are keen to work in partnership to resolve any issues and support well managed waste management sites. We encourage all waste management activities to be conducted within modern infrastructure and quality buildings and well maintained sites and drainage systems to prevent amenity issues. To deliver high standards at waste management and deliver the new London Plan policy we request Policy SD11 is	Support noted.	Local Plan policy SD11 amended to include additional requirements for waste management facilities, as suggested.

			updated to include an additional point on the need for quality infrastructure: C. Development proposals for new waste management facilities will only be permitted where: *f. Sites have high quality supporting infrastructure and enclosed modern buildings to manage dust, noise, prevent fires and protect people and wildlife.* This will ensure the new local plan is in line with the new London Plan (2021) Policy SI 8 Waste capacity and net waste self-sufficiency which requires waste management sites to include enclosed buildings to prevent amenity issues to residents, visitors and neighbouring businesses. *"Developments proposals for new waste sites or to increase the capacity of existing sites should be evaluated against the following criteria* *4) the impact on amenity in surrounding areas (including but not limited to noise, odours, air quality and visual impact) –* ***where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed"***		
Environment Agency	2	SD 11	The list below shows the current sites with waste management permits from the Environment Agency across the London Borough of Lewisham. This shows 13 permitted sites. However, the draft local plan proposes safeguarding only 3 sites which are highlighted in bold below. The new Lewisham local plan should clarify what the plan is for these permitted waste management sites and confirm how any capacity lost will be replaced elsewhere within Lewisham / London. *"9.9.2 Any proposed release of current waste sites or those identified for future waste management capacity should be part of a plan-led process, rather than done on an ad-hoc basis. Waste sites should only be released to other land uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used; where this is not available potential capacity of the site should be appropriately assessed."* London Plan (2021) *LB Lewisham officer note: Table of waste sites included in original representation.*	Noted.	Local Plan amended to provide more clarification around safeguarded waste sites, including sites with licenced waste capacity. This includes further requirements regarding the loss of waste sites, in line with the London Plan and suggested wording.
Environment Agency	2	SD 11	Development proposed close to existing waste management sites should follow the "Agent of change principle" from the London Plan (2021). This should also be applied to new residential development sites located close to neighbouring borough waste management facilities for example waste sites in the LB of Southwark e.g. Millwall and Old Kent road areas.	Noted. The London Plan forms part of Lewisham's statutory development plan, and the paragraph referred will therefore be considered in planning decisions. The Local Plan includes a policy on Agent of Change, which will help give effect to the London Plan.	No change.

			9.8.20 Following the Agent of Change principle, developments adjacent to waste management sites should be designed to minimise the potential for disturbance and conflicts of use. Developers should refer to the London Waste and Recycling Board's design guide for ensuring adequate and easily accessible storage space for high-rise developments, see Part E of Policy D6 Housing quality and standards. London Plan 2021 We are keen to work with you to ensure all waste management sites do not cause amenity issues and there's ongoing partnership to address any amenity issues from waste management sites.		
Greater London Authority	2	SD 11 LNA SA 7	**Waste** The borough accommodates three safeguarded waste sites, all within the Surrey Canal Road SIL at Landmann Way. Their continued safeguarding is welcome. In particular the SELCHP Energy Recovery Facility makes a significant contribution to the pooled capacity of the South East London Joint Waste Planning Group. However, the New Cross Gate Area Framework (2019) referred to the relocation of Construction, Demolition and Excavation waste management facilities as well as consolidation into/at the Landmann Way facilities. There are no details about this in the draft Local Plan, but the Mayor is concerned about the potential loss of waste management capacity, given that this is not addressed in the Planning Group's latest Technical Paper (Dec 2019). Policy SI9(C) of the London Plan states that waste plans should be adopted before considering the loss of waste sites. Proposals to consolidate waste uses should be made only where there is appropriate compensatory capacity. The Apollo Business Centre site, which is proposed for release from designation as SIL, appears to handle scrap metal, i.e. also an existing waste use. The Site Allocation does not refer to this waste use, but the New Cross Gate Area Framework referred to waste management consolidation. This should be clarified taking again account of above-mentioned London Plan policy.	Noted.	Local Plan amended to provide more clarification around safeguarded waste sites, including sites with licenced waste capacity. Local Plan site allocation for Apollo Way amended to signpost existing waste management facility and additional development requirement for appropriate re-provision of safeguarded waste facility.
Lee Forum	2	SD 11	More facilities at a local level are needed to allow people to recycle (outside of normal refuse recycling and food composting) e.g. wood, paint small electricals at a local level to avoid car journeys to the waste facility at New Cross which is a long way away and not everyone has cars. Recycling is a luxury that only car owners enjoy!	Noted. The draft Local Plan includes new standards and policies to help ensure that waste management and recycling facilities are provided in new developments, and that these are appropriately considered through the design-led approach. The Council is currently preparing a Waste Strategy 2021-2031 which will set out priorities and actions for reducing waste, along with re-use and recycling of materials.	No change.
South East London Labour for a Green New Deal	2	SD 11	Recycling rates in Lewisham are improving but are behind rest of London and far off the circular economy principle model proposed in the plan. The plan focusses on new developments but it is not clear what will be done in existing areas where	Noted. The draft Local Plan includes new standards and policies to help ensure that waste management and recycling facilities are provided in new developments, and	No change.

			there is inadequate recycling provision. The current system is not good at separating different types of recycling which means it may not be used most effectively and understanding/compliance with recycling rules is often poor. The system needs both to be simplified and separate waste streams more effectively (paper, plastic, metal, organic).Even if waste is recycled, nationally 30% of plastic is now exported to Turkey and 12% to Malaysia. What happens to Lewisham's recycling collections? What are the emissions from burning waste at SELCHP?	that these are appropriately considered through the design-led approach. However, waste management and recycling services are outside the scope of the Local Plan. The Council is currently preparing a Waste Strategy 2021-2031 which will set out priorities and actions for reducing waste, along with re-use and recycling of materials.	
South East London Labour for a Green New Deal	2	SD 11	The circular economy model focuses on repairing, renewing and reusing. Locally there is scope for green jobs in repairing items at low cost and Lewisham could support small businesses dedicated to reusing materials e.g. furniture and textiles. They should support the campaign for a deposit return scheme on plastic bottles. It is positive that Lewisham has freecycling and a number of areas have informal networks which function in the same way. Can this be further developed? Are there other ways of exchanging, selling on goods at low cost?	Noted. The exchange and/or sale of goods and services is outside the scope of the Local Plan.	Local Plan Part 1 strategic objectives amended to signpost support for green industries and transition to low carbon, circular economy.
South East London Labour for a Green New Deal	2	SD 11	A review of the current recycling strategy should also form part of the plan. Is the strategy of recycling centres adequate? A more decentralised strategy with distributed collection points for example for batteries, bulbs or small electronic devices could also support a higher recycling rate for the borough. Collection of food waste and other organic material is also still very limited and needs to be stepped up significantly	Noted. The Council is currently preparing a Waste Strategy 2021-2031 which will set out priorities and actions for reducing waste, along with re-use and recycling of materials.	No change.
The Hatcham Society	2	SD 11	Waste Management Waste Management is an important topic for Hatcham residents given our area's close proximity to the South East London Combined Heat and Power, better known as SELCHP. Although SELCHP appears to be a green waste recovery processing plant, behind the jargon and smokescreen, it is an incineration plant which belches out hazardous gases and particulate matter. In the Hatcham Society's response to the Local Plan, we decided to research the volume of carbon dioxide (and other gasses) emitted from SELCHP. We discovered, through looking at the latest figures released by the government's Environment Agency for 2019, that SELCHP reported a release of 361,665,000 kg of Carbon Dioxide and 144,818,000 kg of Carbon Dioxide from Qualifying Renewable Fuel Sources. Meanwhile, there was 566, 632 kg of Nitrogen Oxides released last year. Nitrogen Oxides include Nitrogen Dioxide, a harmful gas which damages lungs. The amount of Carbon Dioxide released from SELCHP was 3.3 times more than what was released from the Edmonton Solid Waste Incinerator in 2019 and SELCHP released 2.5 times more	Noted. The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. London Plan policy SI9.C (Safeguarded waste sites) states that "The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost". No suitable alternative sites have been identified and for the time being, the Local Plan must therefore continue to safeguard the site for waste management uses.	Local Plan amended to include a new policy point which seeks to improve the environmental performance of existing waste management facilities.

			Nitrous Oxides than the Edmonton Solid Waste Incinerator. We also do not know the amount of Carbon Dioxide released through the burning of 'biogenic Co2' - food waste - as highlighted in Channel Four's Dirty Truth About Your Rubbish: Dispatches (March 2021). A report titled 'Health Effects due to Emissions from Energy from Waste Plant in London' created for the GLA published in May 2020 found that SELCHP had the highest NOx emission rate out of London's incinerator plants. *LB Lewisham officer note: A table of data in Appendix 1 is included in the original representation. It shows the latest figures released by the government's Environment Agency for 2019, that SELCHP reported a release of 361,665,000 kg of Carbon Dioxide and 144,818,000 kg of Carbon Dioxide from Qualifying Renewable Fuel Sources.* We applaud Lewisham council for increasing its recycling rate of just 16.6% of all household waste being recycled in 2016 to almost 28% in 2018. But we as Hatcham residents are conscious that the remaining 72% (alongside high volumes of waste from neighbouring boroughs) are still incinerated at SELCHP, damaging our lungs and environment. Because of the cloak and dagger method of reporting emissions from waste recovery sites, we also do not know the true level of emissions.		
Blackheath Society no 2	2	SD 12	**SD12 Design to support the circular economy**. We support the policy aim, which seems sensible. We cannot comment on technical aspects.	Support noted.	No change.
Greater London Authority	2	SD 12	The Mayor welcomes the requirement for Circular Economy Statements for major development proposals in line the principles set out in Policy SI 7 of the London Plan. Circular Economy Statements Guidance | London Plan Guidance has been developed, which will be of use when refining the Local Plan.	Support noted.	Local Plan amended to include reference to London Plan guidance, as suggested.
Lewisham Green Party	2	SD 12	**7 SD9 Waste Management & SD 11 Reducing and Managing Waste** In the preliminary section of the Draft Plan, under the heading What We've Learnt, the Plan states "recycling rates have been improving but Lewisham is behind the rest of London". This appears, however, to be the only reference to day- to- day recycling throughout the whole Plan. The sections entitled "Reducing and managing waste" (SD11) and "Design to support the circular economy" (SD12) do both touch on recycling in a broad strategic context, but neither of these sections of the Plan address the recycling rate deficit identified earlier. It is widely agreed that emphasis needs to be placed increasingly on the "retaining" and "refitting" elements of the circular economy. Nevertheless, for much, if not all, of the twenty year lifetime of the Plan, recycling will continue to play	Noted. The draft Local Plan includes new standards and policies to help ensure that waste management and recycling facilities are provided in new developments, and that these are appropriately considered through the design-led approach. The Council is currently preparing a Waste Strategy 2021-2031 which will set out priorities and actions for reducing waste, along with re-use and recycling of materials.	Local Plan Part 4 monitoring framework amended to include additional monitors on waste management and recycling.

			a key role in any Plan that seeks to achieve a carbon neutral Borough. **We would propose that in the Plan the Council should "retrofit" the current built environment in the following way:** **the Council should commit to improving its recycling rates so that they are amongst the top five boroughs in London within 5 years and seek to learn from other London boroughs and comparable cities elsewhere in the UK whose performance outstrips Lewisham's;** **in particular, the Council is strongly urged to set in place policies and procedures that will deliver robust recycling facilities for all residential flats; and that food waste recycling also be made available to all residential properties.**		
Lewisham Pedestrians	2	SD 12	**Principles for determining planning applications – the Local Plan** • The amount of space in both small and large developments given over to service functions should be demonstrably minimised. Attention is drawn to the Create Streets document ***"The bin-lorry effect"*** where this principle is detailed. This will encourage walking by making navigation for pedestrians both easier and safer. • Residential and commercial waste should not be stored on the footway at any time. This includes during collection times as well as storage. Planning applications should show how this will be achieved. This will encourage walking by making navigation for pedestrians safer.	Noted. The draft Local Plan includes new standards and policies to help ensure that waste management and recycling facilities are provided in new developments, and that these are appropriately considered through the design-led approach. The policies seek to ensure that adverse impacts on the public realm are avoided and appropriately mitigated. The Council is currently preparing a Waste Strategy 2021-2031 which will set out priorities and actions for reducing waste, along with re-use and recycling of materials.	No change.
Port of London Authority	2	SD 12	**8. Policy SD12: Design to Support the Circular Economy.** In principle support the policy, including part C which states that development proposals will be expected to sustainably manage both the type and volume of recyclable materials and waste arising from the development during the construction and operational phases. To further support this, as road freight is a major contributor of CO2 emissions, waterways must be considered as part of the solution to reduce dependency on the road network for the transportation of construction materials and freight and should be referenced as part of this policy, specifically for the transportation of construction materials to, and waste from a development site either directly to/from the site or through the supply chain. This would strongly align with the opportunities and challenges of the Local Plan to reduce carbon emissions and improve air quality and is supported by the Thames Vision, which includes the goal to see more goods and materials routinely moved on the river	Support noted.	Local Plan waterways policies amended to provide additional support for freight movement on waterways.
South East London Labour	2	SD 12	We support the sustainable design proposals and the circular economy model. However we hope that the plan can include more radical alternatives e.g. French architects Lacaton &	Noted.	No change.

for a Green New Deal			Vassal, whose principles are 'Never demolish, never remove – always add, transform and reuse'		
Lee Forum	2	HE	Section 4 deals with design and heritage. Here heritage is taken as old and nothing is included about creating new heritage through innovation in design. There needs to be more consideration of how innovative, sympathetic, high quality contemporary design can continue to evolve a high quality architectural history of Lewisham. So many new buildings in Lewisham's developments (particularly in the centre) are devoid of features that can be considered of architectural merit, being built to a type namely glass and steel blocks. Landscaping is generally minimally and box ticking.	Noted. The draft Local Plan Part 2 Heritage section deals principally with designated and non-designated heritage assets for which there are well-established policies and principles for plan making and decision taking in the National Planning Policy Framework. The Local Plan broadly supports and it not considered to preclude the development of high quality and modern, contemporary designs.	No change.
	2	TR	The Plan's high level proposals for transport and connectivity are exciting and I strongly support Lewisham's ambitious target of 90% of journeys being by active travel or public transport by 2041. Given the level of this ambition it is imperative that the council consider the whole borough and absolutely all development decisions if they are to have the possibility of achieving this target. Unfortunately, there is a contradiction in the plan which says (p.457 12.24) that car-free and car-capped developments will only be 'acceptable in principle where the development is located within a highly accessible location and within an area where there is an existing Controlled Parking Zone'. In reality, this excludes the majority of the borough and it seems that Lewisham is not as committed as it may wish to seem to providing car-free or car-capped developments if its commitment is so strongly conditional. To achieve the council's own ambitions for active and public transport, car free developments should be the expectation and the norm with exceptions made for Blue Badges and car clubs only. I welcome the council's commitment to providing better access to EV charging across the borough. However, if this is not to undermine the commitment above to 90% active or public transport it is imperative this new car infrastructure replaces existing car infrastructure by for example being installed between parking spaces on the road. If, instead, new chargers are placed on the pavements then over the next decade we are in danger of seeing huge amounts of Lewisham's public realm removed from the use of pedestrians and given over to drivers. This will have a particularly negative affect on those who use wheelchairs, other mobility devices, buggies and the visually impaired. Lewisham's EV strategy should take a long term view from today and commit immediately to no more charging infrastructure on the pavements.	Support noted. The proposed parking standards (including car-free and car-capped development) included in the Regulation 18 document will be updated to ensure they are in conformity with the London Plan. The Local Plan policies require that new development does not have an adverse impact on the highway network, which includes footpaths and other parts of the public realm. EV charging points must provide for adequate footway clearances. The Council's Low Emission Vehicle Charging Strategy is outside the scope of the Local Plan. However, the strategy addresses issues of safety and use of the public realm.	Local Plan Part 2 parking standards amended so they are in line with the London Plan standards.
	2	TR	The Mayor of London's plans regarding cars are unrealistic and unworkable. The continual traffic jams and increased pollution levels at Lee Green and other streets in the east of the Borough are evidence of that. The Borough's Plan needs to work with cars rather than against them until public transport is improved. Parking is also an issue putting additional burden	The Local Plan is subservient to the London Plan which sets out the future strategy for good growth across the capital. This includes Policy T1 Strategic approach to transport – which states that "Development Plans (such as Lewisham's Local Plan) should support, and development proposals should facilitate: the delivery of the Mayor's strategic target	No change.

			onto local streets. It is nice to think that residents won't have cars but until the transport system works better, more trains and the buses aren't trapped in congested streets people will continue to use cars, especially now in the time of covid where people avoid public transport if they can.	of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041."	
	2	TR	Polluting Industry Reduce the number of trucks coming to the area by changing the use class of industrial and waste processing sites like scrapyards and private waste processing. Support low pollution industries that create jobs for local people in healthy environments.	The use class order can only be changed by central government and not the Local Plan.	No change.
	2	TR	Anti-Car: Being anti- car is not a good idea. The problem will not vanish, it will simply be shunted elsewhere. Lewisham should encourage, at the moment in words at least, hydrogen fuel cells for cars. The waste is … water. It would avoid the current future of mountains of unwanted electrical batteries, that we have ahead of us with this ridiculous craze for electric vehicles. The country will probably be unable to provide a sufficient supply at an acceptable cost, once this craze really catches on. Electricity is the most expensive fuel of all, so more poverty looms.	The Local Plan is subservient to the London Plan which sets out the future strategy for good growth across the capital. This includes Policy T1 Strategic approach to transport – which states that "Development Plans (such as Lewisham's Local Plan) should support, and development proposals should facilitate: the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041." Hydrogen Fuel cell cars are not in wide spread manufacture and have a number of technical challenges including production, storage and cost. Future updates to the Local Plan may pick this up should this technology advance. It should also be noted that the embodied carbon in the production of any private car is considerable whether it is powered by petrol, electric or hydrogen fuel cell. The London Plan and draft Local Plan is therefore promoting the use of more sustainable modes of transport such as walking, cycling and public transport and discouraging the ownership of cars.	No change.
	2	TR	In terms of Transport and Connectivity, I would like to take this opportunity to comment that the assumptions around new homes and jobs will mean more motorised transport trips across the borough. Drakefell Road in Telegraph Hill ward is already accommodating around 10,000 vehicles per day. This proposed local plan will make traffic worse, congestion worse and emissions worse unless there are interventions to reduce through traffic. Moreover, Drakefell Road was recently assessed on the Checklist for Health Streets and scored very poorly. The assessment was undertaken by a range of Transport, Health and Engineering practitioners, including Lucy Saunders who developed the Healthy Streets concepts for Transport for London. Sadly, the checklist provided robust evidence that Drakefell Road is not a Healthy Street. The footways are blocked to the extent that they are holding back the potential for more walking trips, as it is often easier and safer for residents to drive for short trips. This is surely the wrong approach, over time more residents will (this is already	The promotion of walking, cycling and use of public transport are central to the draft Local Plans ambitions and policies and are set our clearly in policy TR3 Healthy streets as part of healthy neighbourhoods. The supporting Transport Strategy and Local Implementation Plan (LIP) outlines how the Council will work with TFL and other key stakeholders to assist with delivering the outcomes, policies and proposals within the London Plan, the Mayors Transport Strategy and the Local Plan. The document also sets out details of local priorities and targets including improvements to local streets. We note your comment on Drake field Road and will pass your comment on to our Transport and Highways team. In response to funding the Council will continue to secure funding from development through Community	No change.

			happening) start to switch back to cars and avoid walking. The effect of this will be to increase inequalities and lead to a more segregated community. In order to mitigate these effects, the current layout of the street which encourages pavement parking to accommodate though traffic; and the poor environment should be prioritised for infrastructure investment and a new approach to street design as per the Healthy Streets approach set out in the Mayor's Transport Strategy and the Local Transport Plan. With the increase in home working, for those who can; and the likely fact that public transport patronage will never recover to pre-covid levels, we sadly face a future of more traffic, noise and emissions. This will be further exacerbated with the Mayor of London's plans to build the Silvertown Tunnel which is in direct conflict with other Mayoral goals. In Lewisham, pavement parking should be phased out at the earliest opportunity. The highest transport priority of this plan should be to enable people to walk. There is a very strong evidence base which demonstrates walking has a key role to play in improving both physical and mental health. This plan should be much more explicit in acknowledging the role of walking in the creation of healthy urban environments and include a modal hierarchy. Unless streets are improved across Lewisham to encourage active travel as well as measures to reduce traffic on B/minor roads, it is difficult to see how the measures proposed are going to facilitate sustainable transport? The plan as it stands is too reliant on unconfirmed investment, it is not clear how current proposals would be sufficient to deliver more homes and jobs. Transport for London recently prioritised investment in the tube network in North London over the Bakerloo Line extension and therefore it does not seem realistic to expect the Bakerloo Line extension to be a serious option to underpin the plan. I offer this consultation response in the hope that these issues will be fully considered and incorporated into the draft plan as it develops. Lewisham has an opportunity to use the Local Plan as a way of promoting and prioritising walking for both health and transport as part of healthy urban development and the wellbeing of citizens. These principals should be guiding decision making, all forms of active travel must be prioritised if the council is serious about the health of its citizens and sustainable development.	Infrastructure Levy (CIL) and S106 agreements where appropriate and will work with TFL and the Department for Transport to secure funding packages for sustainable transport and street improvements. Whilst the level of growth within the plan is not predicated on the delivery of the Bakerloo Line Extension the Council continues to be confident that the business case for the BLE is robust and we will continue to promote the project to secure the necessary funding.	
	2	TR	The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	Whilst broader infrastructure improvements are outlined within the plan and the supporting IDP, specific and detailed infrastructure improvements for individual schemes are assessed at application stage when a more detailed assessments can take place.	No change.

	2	TR	Traffic and Transport: The draft plan seems to recognise that public transport capacity in the borough is now overstretched with overcrowded trains and platforms and a poor service on several lines. Much of the restriction on rail capacity is, I think, caused by the capacity and signalling issues near Lewisham station where various rail lines cross. There needs to be a joined up initiative of the GLA, TfL, and the south London boroughs to identify what improvements could be made to increase capacity and frequency on all the lines. For example, I believe Bexley has a huge potential for additional residential development but needs more and better train services which are constrained by the Lewisham junction. We are aware that dealing with Network Rail, the train operators and the railway jobsworths is a thankless task but there needs to be some serious work and a joined up approach to getting funding and sorting it out. The draft plan and the growth in residential units which it proposes seem to be predicated on the additional capacity afforded by the Bakerloo line extension to New Cross and Lewisham. The damaging effects of Covid on TfL finances make this proposal highly unlikely and even if it does go ahead it is not going to be in the life of this plan. Just see how long Crossrail has taken or the Jubilee line. However, the plan makes no attempt to analyse how all these additional residential units can be serviced and accommodated without a drastic level of improvement in rail and bus transport. The plan shouldn't even mention the extension to Catford as that's definitely not going to happen within the lifetime of the plan and the extra housing outlined in the plan for Catford needs to assess the additional traffic and transport it would generate and require and how it will be serviced. Otherwise the plan is not assessing how these extra units will impact on the existing residents and bus and train users. The plan also makes no mention of the bottleneck caused by the railway bridge at Catford or the restricted pavements on the bridge over the Hayes line. The south circular at this point is pretty much a permanent car park and traffic jam which adds to an awful environment and terrible air quality. Unless active steps are taken to replace the bridge and widen the road under it and provide better wider pavements under it and over the Hayes line bridge and totally review all the junctions, I fail to see how the Wickes sites can be redeveloped for high density housing. Traffic out of the site from the exit nearest the bridge regularly ignores the left turn only requirements and blocks traffic by turning right. The plan should be making clear proposals as to what solutions are available. Likewise, we fail to understand how any proposals are going to come forward during the life of the Plan to realign the South Circular. TfL have	The Council is working with infrastructure delivery partners TFL and Network Rail to improve the boroughs public transport provision including upgrades to the Overground, a new station at Surrey Canal triangle, DLR capacity upgrades and bus service improvements. We are also working together on a new station for Lewisham Town Centre which will fundamentally improve capacity and passenger experience. The Council is a strong advocate of the BLE and the benefits that this will bring to Lewisham residents. However the planned growth within the Local Plan is not predicated on the delivery of the BLE. The housing figures and resulting population growth set out in the London Plan for the borough has been tested by TFL through the London Plan process and through Lewisham's Transport assessment which accompanies the Local Plan. These both demonstrate that there is sufficient capacity across existing and committed improvements to the transport network to accommodate this growth. The Catford Framework sets out the Councils aspirations for Catford Town Centre and outlines a number of transformational transport projects. We are currently working with our partners TFL and Network Rail to deliver these improvements.	No change.

			failed for the last umpteen years although I am aware they have not allowed the Council to remove the proposals from the plan. Perhaps the council should indicate a plan B and give a time limit on the period for the life of the realignment.		
Blackheath Society no 2	2	TR	We broadly agree with the Main issues. We would add (perhaps to Environmental impacts) the impacts on health and well-being of pollution and noise from vehicle use which also deters walking and cycling and damages the public realm.	Noted. The Local Plan broadly addresses environmental and amenity impacts, and the transport policies are a key means to address poor air quality locally.	No change.
Blackheath Society no 2	2	TR	We broadly agree with the headline proposals. We would place greater emphasis on the Lewisham station/interchange upgrade (<10 mentions in the Plan, despite upgrade looking quite likely and relatively early in the Plan [2027]) and on other upgrades to the existing rail and river networks; and less emphasis and dependence on the BLE (750+ references despite it looking less likely at present, certainly not until late in the Plan [post 2030], and then probably only as far as Lewisham).	Noted. Both the Lewisham interchange and BLE are included in the list of key priority transport projects. Whilst the level of growth within the plan is not predicated on the delivery of the Bakerloo Line Extension the Council continues to be confident that the business case for the BLE is robust and we will continue to promote the project to secure the necessary funding.	No change.
Blackheath Society no 2	2	TR	We would add to proposals to Make neighbourhoods healthier and more liveable the idea of the '15 minute city' to improve health, encourage localism in transport and the economy, and reduce the need for motorised transport, especially by road.	Noted. This is reflected in the spatial strategy although it is agreed a reference to 15 minute neighbourhood could be added.	Policy OL1 spatial strategy supporting text amended to refer 15-minute neighbourhood concept.
Brockley Society	2	TR	3.Effective, concrete measures for reducing car use in the borough are needed urgently Chapter 12 of Part Two (Transport and Connectivity) states the aim of reducing car use. Chapters 8 (Economy and Culture) and 11 (Sustainable Design & Infrastructure) support this by noting the benefits of "walkability", the urgency of climate change and the air quality problem in parts of the borough. Despite this, the draft includes no credible measures for reducing car use. Many of the measures proposed, such as improvements to stations and bus stop infrastructure, are already in place in the areas worst affected by car congestion – it is notable that the areas shown in Figure 12.1 as having the best PTALs also have the worst traffic congestion, parking congestion and air quality in the borough and are the least walkable. The Council must consider more effective measures to reduce the environmental and health impact of car use in Lewisham, such as: • Creating low-traffic neighbourhoods that are protected from motorised through-traffic (as proposed by London Living Streets in response to the Council's consultation in November 2018). • A comprehensive borough-wide approach to residents'-only parking zones (subject to appropriately limited hours of operation, visitors' permits, etc.). This is important in order to	The Local Plan sets out this holistic approach and is supported by the Transport Strategy and Local Implementation Plan (LIP). This document outlines how the Council will work with TFL and other key stakeholders to assist with delivering the outcomes, policies and proposals within the London Plan, the Mayors Transport Strategy and the Local Plan. The document also sets out detail of local priorities and targets. Low Traffic Neighbourhoods are outside the scope of the Local Plan. The Council has piloted LTNs and the Council's Transport service should be contacted for further details. The Council has recently committed to rolling out CPZs across the borough where they are supported. Implementing 20mph speed limits has been proven to improve road safety and reduce serious injuries from road traffic accidents. Whilst there is less evidence on the impact of 20mph speed limits on air quality the studies that have been conducted or include this analysis show impacts as negligible or slight improvements. Research into the impact of 20mph speed limits on active travel show higher levels of walking in cycling in areas after the implementation of 20mph speed limits.	Local Plan parking policies amended to fully align with London Plan parking standards.

			avoid traffic and parking problems simply being redirected from one part of the borough to another – as has been seen in Brockley following the introduction of the Ladywell CPZ. Lewisham can learn from the positive experiences of other inner-London boroughs such as Hackney. • Pedestrianised entertainment / retail areas. For example, the immediate vicinity of Brockley station has been temporarily pedestrianised to allow local cafes and restaurants to offer socially distanced outdoor seating. This has been very successful and should be made permanent. Simply reducing vehicle speeds further (as suggested at paragraph 3.34 of page 72) would merely increase the number of vehicles on a given road at any given moment, which would only worsen congestion issues and the borough's air quality. Increasing provision of electric charging points (per policy TR4 on page 456) would similarly do nothing to reduce the number of cars on the road, which is crucial to reducing congestion and increasing walkability.		
Climate Action Lewisham	2	TR	**Transport and connectivity** We strongly support Lewisham's ambitious target of 90% of journeys being by active travel or public transport by 2041, which exceeds the London-wide target of 80%. This is ambitious but the council must consider the whole borough and absolutely all development decisions if they are to have the possibility of achieving this target, and to prioritise how they support residents to use active travel and public transport in place of private vehicles. We applaud plans to ensure that blue badge access is protected and prioritised in all decisions, and the emphasis given to cycling facilities. The requirement on developers to submit healthy streets assessments (Policy TR3 B p.451) is excellent, and we would like to see the details of what stringent standards developments are required to reach and have a clear indication of the consequences of failure to meet them. Council clarity of priority and leadership in creating the kind of urban spaces that encourage and enable sustainable transport options is crucial.	Noted. The Local Plan uses the London Plan target of 90% journeys by walking, cycling and public transport for inner London boroughs as the policy basis – the 80% target is London-wide. Please refer to Policy TR1 Sustainable transport and movement and explanatory text paragraph 12.1. This is an ambitious target and will require substantial investment and support at regional level as well as at a local level. The supporting Transport Strategy and Local Implementation Plan (LIP) outlines how the Council will work with TFL and other key stakeholders to assist with delivering the outcomes, policies and proposals within the London Plan, the Mayors Transport Strategy and the Local Plan. The document also sets out detail of local priorities and targets.	No change.
Culverley Green Residents Association	2	TR	**Traffic and Transport** The draft plan seems to recognise that public transport capacity in the borough is now overstretched with overcrowded trains and platforms and a poor service on several lines. Much of the restriction on rail capacity is, I think, caused by the capacity and signalling issues near Lewisham station where various rail lines cross. There needs to be a joined up initiative of the GLA, TfL, and the south London boroughs to identify what improvements could be made to increase capacity and frequency on all the lines. For example, I believe Bexley has a huge potential for additional residential development but needs more and better train services which are constrained by the Lewisham junction. We are aware that	Noted. The Council is currently working with key stakeholders such as TFL, Network Rail and neighbouring authorities to identify public transport capacity and service improvements. This includes upgrades to the Overground, a new station at Surrey Canal triangle, DLR capacity upgrades and bus service improvements. We are also working together on a new station for Lewisham Town Centre which will fundamentally improve capacity and passenger experience.	No change.

			dealing with Network Rail, the train operators and the railway jobsworths is a thankless task but there needs to be some serious work and a joined up approach to getting funding and sorting it out.		
Deptford Society	2	TR	- There is very little cross-reference to Lewisham's separate Transport Strategy and Local Implementation Plan. - There are no mode share targets for new developments as a whole to show how this delivers a proportion of the overall traffic reduction strategy / decarbonisation agenda etc.	Noted. Whilst there are no mode share targets for new development, the Local Plan and the London Plan has stringent policies on car parking, promoting car free development in accessible locations and 'car lite' development elsewhere. This is assessed through the Development Management processes and is supported by Travel Plans and Transport assessments. These measures along with others within the draft Local Plan are and will continue to reduce car borne traffic generated by new development.	Local Plan amended with reference to Lewisham's transport strategy and Local Implementation Plan in supporting text where appropriate.
Lee Forum	2	TR	A holistic approach is needed for transport to allow active travel, reduce car use, and create sustainable delivery options. Better cross borough transport links are needed to provide access to community facilities by public transport.	Agreed. The Local Plan sets out this holistic approach and is supported by the Transport Strategy and Local Implementation Plan (LIP). This document outlines how the Council will work with TFL and other key stakeholders to assist with delivering the outcomes, policies and proposals within the London Plan, the Mayors Transport Strategy and the Local Plan. The document also sets out detail of local priorities and targets. Please refer to strategic objectives as well as policies TR1 Sustainable transport and movement and TR3 Healthy streets as part of a healthy neighbourhoods.	No change.
Lee Forum	2	TR	A key concern in meeting targets for reducing car journeys is the need for the council to actively promote sustainable local delivery options such as pick up points at hubs to avoid additional delivery journeys replacing private car journeys. To encourage sustainable delivery options through hire of delivery cycles or electric vehicles.	Noted. This is captured in Policy TR5 Deliveries, servicing and construction including the explanatory text paragraph 12.29. The Transport Strategy also has further details.	No change.
Lee Forum	2	TR	Lee Forum has made representations to TFL for new bus routes from the Forum area particularly to connect with Greenwich Town Centre and Greenwich Peninsula following a popular local consultation on the subject. The Council, if it is to cut car journeys, must add its weight to improved south/north bus routes, so that journeys do not all have to be made via changes in Central Lewisham.	Agreed. The Council is working with TFL to secure improved bus provision across Lewisham. Details on local priorities and projects can be found in the Transport Strategy and Local Implementation Plan (LIP) which forms a key evidence base for the draft Local Plan.	No change.
Lewisham Cyclists	2	TR	We believe some of the wording in the plan should be revised to bring it in line with existing policies from City Hall, where walking and cycling should be "enabled" as opposed to "encouraged". Lewisham council has been encouraging and promoting cycling for more than a decade, yet still has one of the lowest mode shares for cycling amongst all inner london boroughs, and the worst Healthy Streets Score of any Inner London borough. The key missing element to date has been dedicated infrastructure, creating a fully integrated cycle network which meets London Cycle Design Standards and	Noted.	Local Plan amended to ensure wording of specific policies and aligns more closely with the London Plan e.g. enabling not just encouraging

			enables all residents in the borough to choose cycling as a viable mode of transport.		movement by walking, cycling and public transport. Local Plan amended to include an additional policy point referencing the London Cycle Design Standards.
Lewisham Cyclists	2	TR Figure 12.4	We also note the outline strategic cycle network (figure 12.4) doesn't use current nomenclature for cycleways, instead mentioning the now defunct quietways and cycle superhighways. This figure also shows incorrect routing for the A21 Lewisham Spine which should follow the A21 and A20 as far as Jerrard Street before heading North up Brookmill road. This should be amended along with the terminology used to comply with the Transport for London Cycling Action Plan. Whilst we support the aims of the strategic cycle network mentioned, we would expect this network to now be built to a standard which follows London Cycle Design Standards. It should be noted that Lewisham council has yet to build any protected cycle track of considerable length within the last 5 years. The protected cycle track on Edward street in Deptford is to our knowledge, the only protected space (on a road) in the entire Borough that meets current design standards and was provided as part of Quietway 1 funded through TfL 5 years ago. It is approximately 250m. We would urge the planning department in the council to work more closely with highways in addressing a number of issues throughout the borough which have severed communities for decades and created pinch points, all of which should be addressed in any strategic planning documents for development on a number of adjacent sites. We provide some examples of this further below, although not an exhaustive list. Lewisham Cyclists would urge the council to update the existing borough cycle strategy and transport strategy to meet updated guidance and design principles as detailed in Transport for London's Cycling Action Plan.	Noted. The Council will continue to work with stakeholders including development industry partners and transport for London / London Mayor to deliver cycle infrastructure improvements, having regard to the London Cycling Action Plan, Lewisham Cycle Strategy and Local Implementation Plan. The Local Plan sets out approaches to encouraging and enabling modal shift, including by applying the Healthy Streets Approach and delivering a new Lewisham Links policy.	Local Plan amended to refer 'cycleways'. Local Plan amended to include an additional policy point referencing the London Cycle Design Standards.
Lewisham Cyclists	2	TR	Lewisham's Cycling Strategy (2017) itself informs much of the Transport and Connectivity section, which is welcomed. However, it is important to note that thelast known review of this (https://councilmeetings.lewisham.gov.uk/ieListDocuments.aspx?CId=136&MId=5566) reflected the significant challenge of targets already set , most of which were under-achieved at this review, and remain so eighteen months later. Ambitious	Noted. Not specific to the Local Plan but we will pass on your comment to the Strategic Transport and Highways team.	No change.

			targets of doubling the number of cycling journeys; increasing the proportion of people cycling to work to 10%; halving casualty rates of cyclists; and increasing the proportion of children cycling to school to 50% remain, and the gap towards closing in on those laudable metrics is as challenging as ever. Out of the 21 “quick win” cycle contra-flows identified, only 3 have been implemented in the period since the review.		
Lewisham Cyclists	2	TR	More positively Lewisham has made progress with school streets but there are many more significant and structural interventions required before Lewisham becomes an active travel exemplar. Securing these will require a more joined-up strategic approach where the Borough can apply an organisation wide culture of thinking beyond the car, amongst all its officers and members.	Noted. Not specific to the Local Plan but we will pass on your comment to the Strategic Transport and Highways team.	No change.
Lewisham Cyclists	2	TR	Despite our obvious reservations on the scale of the challenge ahead, we remain committed to supporting Lewisham where there is commitment to real and lasting change. Anecdotally the number of people cycling, and crucially the number of people who would cycle if it was safe, have grown during the pandemic. Despite the hardships and tragedies of the past year, most of us have significantly changed our behaviour in our daily lives. We want a new normal which enables more people to walk and cycle in a safe and pleasant surrounding that is good for health, and people’s social and mental well being. It will also make them happier and benefit the local economy and cultural life of the Borough.	Noted.	No change.
Lewisham Cyclists	2	TR	**General points about infrastructure schemes:** • The Mayor‘s Streetspace Plan and Transport Strategy relies on a growth in cycle trips to keep London moving. This means infrastructure schemes must be designed to accommodate growth in cycling. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key. • As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in an area. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset. • Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport modes for return on investment according to	These general points are supported by the Council and have informed our policies within the Local Plan.	Local Plan amended to include an additional policy point referencing the London Cycle Design Standards.

			a DfT study. Schemes which promote cycling meet TfL's "Healthy Streets" checklist. A healthy street is one where people choose to cycle. • All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people. • Evidence from TfL and from many schemes in London, the UK and worldwide shows the economic benefits, including to businesses, to be found from enabling a wider range of people to cycle more. Further evidence shows how cycling schemes also benefit air quality and reduce climate changing emissions, as well as improving resident health outcomes and reducing inactivity, as mentioned above. • LCC wants, as a condition of funding, all highway development designed to London Cycling Design Standards (LCDS), with a Cycling Level of Service (CLoS) rating of 70 or above, with all "critical issues" eliminated. Above 2,000 Passenger Car Unit (PCUs) motor vehicle movements per day, or 20mph motor traffic speeds, cycling should be physically separated from motor traffic.		
Lewisham Liberal Democrats	2	TR	6. Consideration should be given to new modes of transport in the borough in general, such as a tram system. There is practically no mention of facilities for electric cars (extra charging points) or the impact of extending the Bakerloo line to Lewisham. In the Lewisham south plan, the Bakerloo Line extension is an integral part of the anticipated development at Bell Green. Would the latter go ahead if the extension does not materialise, because without it there would not be adequate transport links for this proposed development?	Noted. The draft Local Plan identifies and seeks to secure the delivery of transport projects identified in the Local Implementation Plan and the Mayor's Transport strategy. The delivery of the Local Plan is not contingent on the delivery of the BLE. The Phase 2 of the BLE would help to enable a significant uplift housing in the Bell Green area with improved transport access providing for higher densities.	No change.
Lewisham Pedestrians	2	TR Infrastructure Delivery Plan	**Transport infrastructure schemes** The opportunity to make our streets and open spaces safer for everyone now exists through improved lighting, safety campaigns, emergency facilities, wider footways that are clear of clutter and well maintained etc. Walking networks should be the norm with supporting measures on main roads with safe crossings that follow desire lines. Examples of schemes that we would like funded through the CIL and included in the IDP: • Safe crossing places on all the main roads (designated A or B) in the borough following desire lines and at intervals of no less than 100 metres. These roads include TfL's TLRN as well as a number of council roads. • A pedestrian phase on all arms of all signalised junctions in the borough. These should be straight across (never leaving people standing in the centre of a	Noted. These general principles are picked up through policy QD3 Public realm and connecting places, TR3 Healthy streets as part of healthy neighbourhoods and London Plan policy T2 Healthy streets. The Infrastructure Delivery Plan identifies specific infrastructure projects needed to sustainably support future population growth and housing delivery in Lewisham. If groups have specific community projects they wish to promote these can be submitted through the Neighbourhood CIL process.	No change.

			busy road), provide enough time to cross (based on 0.6 m/s) and with fair waiting time (based on actual user counts, modal encouragement, comfort and behavioural safety analysis). • Provision of appropriate resting point seats for people who cannot walk far. • Far wider footways around bus stops and especially those that are busy at public transport interchange points and in commercial and leisure centres. • Schemes should enable the council to clear pavement clutter (using contractors or using/threatening Enforcement Notices). • Schemes should enable auditing of footway quality (surfaces and useable widths). • Schemes should speed up the repair of reported damaged/dangerous footways (using additional contractor capacity). • Schemes should support the improvement of the de-icing/gritting regime (see this **TfL document** for further information). • Removal of pavement parking in the borough so that vehicle parking is in the roadway. This can be done using a programme of new traffic orders and re-positioning of road markings. Pavement parking discourages walking because it is dangerous and restricts the footway. • End illegal pavement parking in the borough through public information and enforcement. Pavement parking discourages walking because it is dangerous and restricts the footway. • Development of a borough-wide walking network that links likely places of origin and destination for walking journeys.		
Lewisham Pedestrians	2	TR	We support the extension of bus services over all other forms of public transport. Bus services can be more easily extended, have much better reach, are flexible, cheaper and have the potential to provide zero (or near zero) carbon emissions.	Noted.	No change.
Lewisham Pedestrians	2	TR	We support the ending of the use of minor roads (those not designated A or B) as cut-throughs by vehicles. This makes all roads safer with the additional benefit of reducing turns in, and out, from main roads and the further provision of continuous pavements where roads are closed off.	Noted.	No change.
Lewisham Pedestrians	2	TR	Additionally, we wish to draw attention to the Doggett Road footbridge that appears to currently have inadequate funding despite the allocation of a large amount of s.106 monies. We would like to see this scheme funded as soon as possible from unspent transport infrastructure allocation. A bridge with lifts would cost no more than £2m and the budget allocated is already in excess of £1.5m – Lewisham Pedestrians has met with architects working with Network Rail on footbridge design	Noted. At its meeting on 16th September 2020 Mayor & Cabinet agreed the transfer of S106 funding originally proposed for the delivery of a footbridge between Doggett Road and the Barratt's development on the former Catford Greyhound Stadium site to be used to deliver a programme of public realm and accessibility improvements to Catford Station areas. See M&C report for further details.	No change.

			regarding this matter and are exploring how to progress this scheme.		
Lewisham Pedestrians	2	TR Infrastructure Delivery Plan	**Social and green infrastructure schemes – health and care facilities** Walking provides effective and sustainable physical activity and wider healthy lifestyle opportunities for everyone who lives, works or learns in Lewisham. Walking is a 'miracle cure' in terms of a truly equitable and inclusive measure that helps to provide ill-health prevention along with longer, fitter lives. Current research is confirming the mental well-being and cognitive benefits of simply getting up and putting one foot in front of the other. We have identified that *everyday walking* is a physical and mental activity that fits nearly every aspect of the borough's healthy lifestyles strategy aims. *Everyday* walking allows everyone in the borough to explore, relax, unwind, be challenged, achieve well-being, acquire fitness, control or reduce weight, meet other people, experience adventure and have fun. Walking is linked with all the travel, work, leisure and learning activities that take place every minute of every day in every part of the borough. *Everyday walking* compares well with every alternative form of physical activity – no assisted travel is required to other locations, there are no parking issues, walking creates no pollution, it is affordable for everyone, every part of the borough is covered, no one is left out, local authority resources go a long way and walking facilities are open all day, every day. Examples of schemes that we would like funded through the CIL and included in the IDP: • Park entrances safer, more easily identified and inviting for people walking by creating new zebra crossings at entrances and access points. This will encourage park use for walkers and make access safer. • All Lewisham residents and learners should be familiar with and have access to a pedometer, activity tracker or smartphone app. This will help encourage walking, improve health and reduce obesity. • Provision of dedicated walking exercise tracks in parks and open spaces for people walking to keep healthy.	Noted. These general principles are picked up throughout the Local Plan including policy TR3 Healthy streets as part of healthy neighbourhoods and London Plan policy T2 Healthy streets. The Infrastructure Delivery Plan identifies specific infrastructure projects needed to sustainably support future population growth and housing delivery in Lewisham. If groups have specific community projects they wish to promote these can be submitted through the Neighbourhood CIL process.	No change.
Make Lee Green	2	TR	**Low Traffic Neighbourhoods Work** As a group that was formed to support the introduction of an LTN, it should not be a surprise that *Make Lee Green* would like to see LTNs introduced more widely across Lewisham. The evidence from academic research and the Council's own monitoring in Lee Green have shown that LTNs can dramatically improve the quality life for residents, reduce air pollution, lower crime and improve road safety. All of this	Noted. Low Traffic Neighbourhoods are just one of many measures that Local authorities are exploring to make it safer to travel by foot or by bike and contribute to the achievement of the London Plan target for 80% of all Journeys in London to be made by walking, cycling or public transport by 2041.	No change.

			without raising traffic or pollution levels on surrounding roads. The statistics from other inner London LTNs are compelling. Reallocating road space to walking and cycling reduced traffic by 21.9% on average and the surrounding areas saw no additional traffic - Lambeth's LTN has seen traffic fall by 35% and cycling increase by 69% - The Dulwich LTN saw a 700% increase in children cycling to school - Railton Road had a 175% increase in women on bikes - Research has demonstrated that LTNs lead to a 10% reduction in street crime The Lewisham and Lee Green LTN has transformed the area. We had streets that we experiencing 3 million cars per year. That is the equivalent of every car in London driving past some homes. While we still see spikes in traffic as a result of the partial reversal of the LTN, overall traffic remain substantially lower and according to the Councils own data there has been no impact on air quality on surrounding roadsviii. Instead we have seen huge increases in children walking and cycling to school. The streets are safer and more walkable. Local shops are seeing the benefits of increased trade. What has happened in Lee Green could be replicated across Lewisham. There is a clear need to reduce traffic on the minor and residential streets where 90% of Londoners live. According to Department for Transport analysis these streets have seen a 72% increase in traffic over the last decade, while A-roads have seen traffic decline slightlyix. This is unsustainable and unfair. Driving is a minority activity in Lewisham. 55% of households do not have access to a carx yet we all suffer the consequences of uncontrolled car usage. Every properly conducted poll has found that there is overwhelming support for LTNs. Redfield & Wilton's latest results are that 47 per cent of Londoners either support or strongly support them compared with just 16 per cent who oppose or strongly oppose themxi. Fundamentally, Lewisham needs streets for people not roads for cars. Streets where people live and work and shop and play. That's the overarching goal of Low Traffic Neighbourhoods - to turn roads that are used as a shortcut to somewhere else back into streets that serve the communities that live along them. Tackling unsustainable traffic is key to solving so many other objectives of the Plan and we believe action on LTNs is an essential component in delivering a greener, healthier and more equitable Lewisham.	Low Traffic Neighbourhoods are outside the scope of the Local Plan. The Council has piloted LTNs and the Council's Transport service should be contacted for further details. We will pass your comments on to our Transport and Highways team who are currently working on the LTNs.	

Make Lee Green	2	TR	**Action on Main Roads** The Plan recognises that the "strategic corridors", the A20, A21 and South Circular are major barriers to progress and are the cause of significant health, social and environmental problems in the Borough. We support the stated aim of transforming them in to "well functioning and healthy streets". But no solutions are proposed in the Plan. These roads should not be A-roads. They are not fit for purpose. The plan needs to recognise them for what they are – in large part residential roads with excessive traffic on them. Diverting this traffic on to B and unclassified streets is not a solution. A radical re-think is required. Either they need to be reclassified and traffic managed down to normal levels, or they need to radically upgraded to cope with the volumes of cars on them. All three of these roads are planning errors from the 1960s that need to be corrected, and a failure to acknowledge this will seriously hamper the ability of the Council to deliver on the objectives of the Plan.	Noted. As you have noted the Local Plan acknowledges these as strategic corridors and the challenges that these streets bring. These 'red routes' are in the ownership and control of TFL and are key arterial routes in TFL's road network. The Council will continue to work with TFL to improve these corridors and transform them into well-functioning and healthy streets.	No change.
Make Lee Green	2	TR TR 03	**Action on Cycling** Lewisham's record on safe cycling is particularly poor and this needs to change urgently. - Segregated cycle lanes should be installed on all main roads under both TfL and Council control. All new developments along corridors such as the A21, A20, A205 and A2212 should have strategic planning conditions required by S106 or CIL contributions from developers to provide funding for necessary infrastructure to meet Council Transport and Cycle Strategies. - Cycling infrastructure should be fully integrated with the public transport network. There should be safe cycling routes to and from all train and tube stations. This should be designed in line with TfL Cycling Action Plan requirements, meeting or exceeding London Cycle Design Standards. - Adequate, secure bike racks should be installed at every station, high street, residential development and school exceeding current London Plan requirements. - The Plan should incorporate the recommendation of the London Cycling Campaign's *Climate Safe Streets* reportxii.	Noted. The Council will continue to work with TFL to improve these corridors and transform them into well-functioning and healthy streets. The feasibility and financial viability of segregated cycle lanes will continue be explored. The draft Local Plan Transport policies broadly support the delivery of high quality public realm as part of the integrated approach to transport, and rebalancing the transport system away from car use to more sustainable modes.	Local Plan amended to refer London Cycle Design Standards. Local Plan amended to make clearer the priority afforded to movement by walking, cycling and public transport, including revised parking policies to reflect the London Plan parking standards.
NHS (HUDU)	2	TR	**Sustainable Transport and Connectivity** We broadly welcome this section. However, we would highlight the importance of ensuring that the design of new developments ensures adequate access for emergency vehicles, and the transport network allows good access for emergency vehicles to get to their destination within the necessary timescales.	Noted	TR5 amended to include reference to emergency vehicles as suggested.

NHS (HUDU)	2	TR	Reference is made to the A21 and TfL Healthy Streets, however, this should apply more widely including across Lewisham Town Centre, as it and other areas lack green infrastructure with few trees and large areas of hard landscaping. The positive impact of greening urban area on health, particularly mental health is well documented.	Noted. Draft Local Plan Policy TR3 Healthy streets as part of healthy neighbourhoods covers all streets within the borough including those within Lewisham Town Centre. Local Plan Part 3 on Lewisham's North Area sets out further detailed requirements for Lewisham town centre, including site allocations within it.	No change.
Telegraph Hill Society	2	TR	We believe that the Plan considerably misestimates the changes which will occur during the period of the Plan. Clearly demand will increase, if the increase in population for the Borough actually materialises; on the other hand, changes in demographics as regard home working and the attractiveness of the City centre may reduce radial transport, whilst increasing home delivery demand may affect cross-London and local journeys.	In accordance with the NPPF the Local Plan will be reviewed and updated every 5 years. Any significant changes that have not been anticipated through the plan preparation process and the transport assessment will be picked up then.	No change.
Telegraph Hill Society	2	TR	The key issue with connectivity within the Borough is that all public transport modes(and many of the main roads) are radial, severely limiting cross South London journeys. This is particularly apparent with the rail links. A journey, for example, from New Cross Gate to Dulwich might take 20 minutes by car but can take an hour by train or bus with the changes and walking involved and not all residents have the ability or desire to cycle.	The Local Plan has been prepared in collaboration with our transport team and informed by evidence base documents such as the Transport Assessment, Train strategy etc. The Council acknowledges the current issues with east west public transport connectivity and is working with transport providers to make improvements.	No change.
Telegraph Hill Society	2	TR	We are not sure that the Plan adequately caters for a change to electric vehicles. We would see the demand for these, over the life of the Plan, and particularly with target of phasing out diesel and petrol vehicles by 2030, increasing substantially. Given the poor public transport connectivity on non-radial routes, we do not necessarily see car usage falling drastically, despite the current Mayor of London's ambitions.	The Local plan responds to the London Plan target of significant model shift.	No change
Telegraph Hill Society	2	TR	We note **TR4.I** but consider that more thought needs to be given in the Plan for the need for electric charging points and garaged accommodation in new developments, especially given that such developments will have a life longer than that of this Plan. The Plan also needs to set out how local recharging points will be created in existing areas to facilitate the changeover of current residents from petrol/diesel to electric, particularly given that the overwhelming majority of properties in the north of the Borough do not have garage accommodation.	The Local Plan supports the parking standards set out in the London Plan which promotes car free or car lite development. Whilst we acknowledge the need for car charging points we recognise the need to dramatically reduce the number of trips by private vehicles.	No change
Telegraph Hill Society	2	TR	The Plan at **§ 12.26** states that *"it is recognised that that some residents and commercial uses in less well-connected areas will continue to rely on vehicles".* As we have indicated in examples above, "well-connected" is a widely misused term. New Cross Gate, for example, is well-connected with certain areas but not well-connected to many destinations either west or east. Nor is it currently well-connected with a range of shops other than for food provision (see our comments on policy **EC12** at paragraphs 169 to 173). Furthermore, lack of connectivity itself is only one reason why vehicle use remains popular: cars are convenient. Public transport lacks door-to-door convenience and immediate availability. There is also the need to carry	Whilst we accept that PTAL is a blunt tool it is recognised as an indication of how well a place is served by public transport. New Cross Gate is a well-connected neighbourhood and as such new development should be car-free. In order to improve air quality, reduce traffic congestion and meet the London Plan targets for modal shift we must reduce the reliance on private vehicles.	No change.

			luggage and goods to and from a station or bus stop. These, together with the often wet weather in the UK, are some of the main reason why cars will remain attractive. Merely looking at PTAL ratings and the traffic network does not provide an adequately grained understanding of why private vehicles are still used even in areas which are apparently well-connected with public transport.		
Telegraph Hill Society	2	TR	Pool cars may alleviate part of the problem but to suggest that it is only *"some residents"* in *"less well-connected areas"* who *"will continue to rely on vehicles"* demonstrates a significant misunderstanding of the issues.	In order to improve air quality, reduce traffic congestion and meet the London Plan targets for modal shift we must reduce the reliance on private vehicles.	No change.
Telegraph Hill Society	2	TR	In particular, permitting or encouraging developments of large numbers of units with no parking provision will ensure that **Strategic Objective D3** (to ensure that housing needs the needs of all age groups at different stages of life, particularly families) not be realized as the compelling need for families, for the elderly and others who rely on the convenience and safety of motor vehicle travel will need to move to homes better served for car use.	Parking requirements within the Local Plan are consistent with the London plan	No change.
Telegraph Hill Society	2	TR	For businesses we would see an increasing need for vehicles as the demand for on-line and home shopping increases, with this, according to some retail estimates, being the major way of shopping in the future. Whilst this could see a decrease in the use of private vehicles for shopping trips, it will bring with it its own issues which this section does not adequately cover (see our comments on **TR5** below).	Noted – comments below	No change.
Telegraph Hill Society	2	TR	Although there are policies supporting safe streets and pedestrian connectivity, gaps remain within the policies as the main elements of the policies set out in Plan only deal with new developments. This alone will not deal with the Strategic Objectives (in particular **Strategic Objectives G17 and G19**) set out in the Local Plan especially as the majority of streets are already in the Council's care. The Council should commit itself to re-introducing an updated version of its discarded Streetscape Manual and set out clear parameters for the improvement of poorly maintained pavements, excess signage, the placement of street furniture (including electric charging points) etc.	We will pass this comment on to our highways team.	No change.
Telegraph Hill Society	2	TR	Policies also need to cover facilities to make walking easier for the less-abled and the elderly, including provision of toilet facilities and, critically, more street benches and places to rest. These policies should apply to new developments (as **QD3.G** does) but there should also be a commitment by the Council to put such facilities into other areas to meet **Strategic Objectives E11 and G17.** Merely requiring these features in new developments will not meet those objectives or make up the deficit in present provision.	The Local Plan is primarily focused on policies covering new development. However we will pass this suggestion on to the relevant department.	No change.
Telegraph Hill Society	2	TR	We appreciate that the funds may not be available to do all these things in the immediate future, although some could be provided through s106 and CIL, but this is meant to be a Plan	Noted	No change.

			covering how Lewisham expects to evolve and meet residents' needs to 2040.		
Transport for London	2	TR	We recommend that 'car-lite' is used instead of 'car-capped' for consistency with the London Plan. PTAL is Public Transport Access Levels and not 'Accessibility' The local plan is well articulated, but it is very long and repetitive at times. It might be helpful to make it more concise. Throughout this appendix, new text suggestions are made in **'bold underlined'** and text to be deleted is ~~**'bold strikethrough'**~~.	Noted	Local Plan amended to reflect terminology changes suggested.
Transport for London	2	TR	Thank you for giving Transport for London (TfL) the opportunity to comment on Lewisham Regulation 18 draft local plan. We will be using the London Plan 2021, which was published on 2nd March 2021 to assess and respond to local planning policy consultations, including Lewisham's local plan review. Local plan policies should be developed in line with relevant London Plan policies and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network. We are therefore happy to see that the Lewisham draft local plan (2020-2040) includes a number of policies and broader themes that strongly support these aims. There are a few areas that we would like to highlight, related to car parking policies and the Bakerloo line extension (BLE), among others, where the local plan can be further strengthened to align with the Borough's vision and address some potential inconsistencies. However, we strongly welcome the intention to follow the London Plan parking standards and believe this will ultimately lead to much more sustainable growth than would otherwise occur.	Noted. The draft Local Plan has been prepared having regard to the London Plan, Mayor's Transport Strategy, the Healthy Streets Approach and Mayor's Vision Zero. However it is acknowledged that amendments to the Local Plan transport policies will ensure the plan better aligns with the London Plan. Further details are set out elsewhere in this consultation statement, in response to TfL detailed representations.	No change.
Transport for London	2	TR	We commend the local plan for giving a good sense of local character and identifying opportunities for growth. We also highly encourage inclusion of good growth principles, including Healthy Streets Approach and Vision Zero as well as strongly responding to climate change. We appreciate the policies of inclusive and sustainable travel modes and addressing severance through specific transport improvements. The local plan does mention a partnership approach and planning contributions for many such interventions. We would like to see further detail of how interventions to enhance walking and cycling, and create	Support noted. With regard to enhancing walking and cycling, and creating healthy streets the Council has prepared or is preparing a number of Framework documents which provide further detail on key projects. These include the North Lewisham Links, the Catford Framework, New Cross Area Framework and the A21 Development Framework. The Local Plan also provides details on key walking and cycling routes in Fig 12.4 supporting Policy TR3 Healthy streets as part of health neighbourhoods. This in turn feeds into Lewisham Links policies, where development proposals	Officers have reviewed the Lewisham Links policies and strengthened development requirements within site allocations to contribute to the coordinated

			Healthy Streets, will be delivered. We would also like to see detail on how interventions will be coordinated among site allocations, through which key corridors can be improved. Similarly, we appreciate a commitment to greening, improved public realm, and pedestrianisation, but more specificity would be helpful. Through traffic is mentioned as a problem, no specific solutions are set out for reducing it. For example, the plan includes an aim to reduce the dominance of vehicles at the A20 Lee Green (Tigers Head) junction but does not set out how this should be done. There is very little said about development of the bus network and its role in encouraging walking trips in town centres as well as supporting growth. Bus reliability schemes are mentioned, but without any detail. Overall, the draft plan can be further strengthened to prioritise competing road space use to support sustainable travel and transport. Generally, all parking references such as for gypsy and travellers, visitors, students, and specialist housing, etc. should cross reference local plan policy TR4 or the London Plan standards to avoid confusion that unrestrained parking will be allowed. Since the adoption of the new London Plan on 2 March 2021, 'draft' should be deleted from 'draft London Plan' throughout the document.	will be expected to facilitate the creation and enhancement of the Lewisham Links, a connected network of high quality walking and cycle routes linking key routes, public open spaces and other key destinations. This is then fed into individual site allocation development requirements and guidelines.	delivery of these routes. References to TR4 or London Plan standards have been added. Local Plan amended to ensure appropriate reference to London Plan (2021).
	2	TR 01	I am really excited about the redevelopment plan and think it will be a fantastic update for the area. I understand from Councillor James Walsh (cc'ed) that the formal consultation window has now closed however I was keen to still put in a thought and request if possible. I am a resident on Sangley Road and at the moment traffic on Sangley Road is regularly congested by a combination of too much traffic; poor road structure causing back ups and people using the road as a cut through. My concern is that the redevelopment plan and the rerouting plan for the South Circular will dramatically increase these problems. I am worried that it will make Sangley Road a 'rat run' for even more people trying to find a quick way through. This will increase congestion and pollution for residents, increase pollution around the Holy Cross School and cause delays to public services e.g. deliveries and buses. Has any thought been given to how this can be avoided? Have we considered options such as restricting access, putting in speed bumps or any other measures to dissuade people	Noted. Whilst the draft Local Plan seeks to enable the re-routing of the South Circular at Catford, the specific nature of the design and any additional works on neighbouring roads or other parts of the public realm will be considered through the planning approvals process, taking into account the Transport Assessment that would need to be submitted with the application.	No change.

			from using it as a rat run? On the speed bumps in particular, the road has already got these installed when it turns into Sandhurst Road however if somebody cuts off Brownhill Road down St Fillans Road, and then turns right onto Sangley Road, they have a 'clear run' through to rejoining the A205 avoiding several sets of traffic lights and queues. It would be great to get an update on any actions already in process or being planned for these issues. Or if not already then please could they be addressed?		
	2	TR 01	The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	Noted. Whilst broader infrastructure improvements are outlined within the plan and the supporting IDP specific and detailed infrastructure improvements for individual schemes are assessed at application stage when more detailed assessments can take place.	No change.
	2	TR 01	The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	Noted. Whilst broader infrastructure improvements are outlined within the plan and the supporting IDP specific and detailed infrastructure improvements for individual schemes are assessed at application stage when more detailed assessments can take place.	No change.
	2	TR 01	New Cross Road has the worst pollution in London. Plans in the LLP to improve the air quality directly contradict the expansion of residential properties in the area by more than 6000 residential unit that will bring their carbon footprint in extended vehicle use, services and domestic energy use. The plan cannot claim Green credentials whilst contradicting itself in its methods and aspirations for the area.	Noted. Lewisham must plan for the growth required to meet its London Plan target of 1,667 new homes per year. Our view is that these homes are best located in areas which have good access to public transport, services and job opportunities to reduce the need for car use. New Cross is one of a number of areas where the Local Plan promotes significant development. The Local Plan also sets out policies to reduce car use, insisting on car free development in accessible locations, promoting the use of sustainable forms of transport and identifying significant improvements to public transport.	No change.
	2	TR 01	The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	Noted. Whilst broader infrastructure improvements are outlined within the plan and the supporting IDP specific and detailed infrastructure improvements for individual schemes are assessed at application stage when more detailed assessments can take place.	No change.
	2	TR 01	The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	Noted. Whilst broader infrastructure improvements are outlined within the plan and the supporting IDP specific and detailed infrastructure improvements for individual schemes are assessed at application stage when more detailed assessments can take place.	No change.
	2	TR 01	The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	Noted. Whilst broader infrastructure improvements are outlined within the plan and the supporting IDP specific and detailed infrastructure improvements for individual schemes are assessed at application stage when more detailed assessments can take place.	No change.
	2	TR 01	3. Please encourage some body to provide step-free access to Catford train station. I guess Nunhead station, being in Southwark, is outside your remit, but step-free access there would be great. It is within a few hundred metres of Lewisham.	Noted. At its meeting on 16th September 2020 Mayor & Cabinet agreed the transfer of S106 funding originally proposed for the delivery of a footbridge between Doggett Road and the Barratt's development on the former Catford Greyhound Stadium site to be used to deliver a programme	No change.

				of public realm and accessibility improvements to Catford Station areas. This includes looking at options to provide step free access at Catford Station. See M&C report for further details.	
	2	TR 01	4. Crofton Park station has a curved platform on both sides. The northbound/City-bound platform has a huge, cavernous gap to the floor/door of some trains. It is very dangerous.	Noted. Not specific to the Local Plan but we will pass on your comment to the Strategic Transport and Highways team.	No change.
	2	TR 01	The infrastructure improvements needed for Lee Green's development shouldd be explicitly outlined in Lewisham's Local Plan.	Noted. Whilst broader infrastructure improvements are outlined within the plan and the supporting IDP specific and detailed infrastructure improvements for individual schemes are assessed at application stage when more detailed assessments can take place.	No change.
	2	TR 01	**Transport** The council has an ambitious target of becoming carbon neutral by 2030, but it currently has little prospect of meeting this target and it lags well behind its Inner London peers in terms of active travel mode shares. If it have any hope of meeting this target the council must "enable" cycling by providing a cohesive, borough-wide network of protected cycle lanes on main roads, rather than "encouraging" cycling on manifestly unsafe roads as the current wording implies.	Noted.	Local Plan amended to ensure wording of specific policies and aligns more closely with the London Plan e.g. enabling not just encouraging movement by walking, cycling and public transport.
	2	TR 01	The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	Noted. Whilst broader infrastructure improvements are outlined within the plan and the supporting IDP specific and detailed infrastructure improvements for individual schemes are assessed at application stage when more detailed assessments can take place.	No change.
	2	TR 01	The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan. Please keep me updated on developments and any further key stages in the consultation process.	Noted. Whilst broader infrastructure improvements are outlined within the plan and the supporting IDP specific and detailed infrastructure improvements for individual schemes are assessed at application stage when more detailed assessments can take place.	No change.
	2	TR 01	I would also like planned infrastructure improvements for the Lee Green area to be included in the Local Plan.	Noted. Whilst broader infrastructure improvements are outlined within the plan and the supporting IDP specific and detailed infrastructure improvements for individual schemes are assessed at application stage when more detailed assessments can take place.	No change.
	2	TR 01	The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	Noted. Whilst broader infrastructure improvements are outlined within the plan and the supporting IDP specific and detailed infrastructure improvements for individual schemes are assessed at application stage when more detailed assessments can take place.	No change.
	2	TR 01	I would also like planned infrastructure improvements for the Lee Green area to be specifically included in the Local Plan	Noted. Whilst broader infrastructure improvements are outlined within the plan and the supporting IDP specific and detailed infrastructure improvements for individual	No change.

				schemes are assessed at application stage when more detailed assessments can take place.	
	2	TR 01	The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	Noted. Whilst broader infrastructure improvements are outlined within the plan and the supporting IDP specific and detailed infrastructure improvements for individual schemes are assessed at application stage when more detailed assessments can take place.	No change.
	2	TR 01	The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan, and the impact that the proposed development would have on traffic flow in the area would need to be carefully considered and taken into account.	Noted. Whilst broader infrastructure improvements are outlined within the plan and the supporting IDP specific and detailed infrastructure improvements for individual schemes are assessed at application stage when more detailed assessments can take place.	No change.
	2	TR 01	A well connected borough. Our local economy will only thrive if the borough is well connected with routes that are accessible and un-congested. New developments must be "car-capped" and support for motor vehicle free households must be prioritised. Implementing actively enjoyable "active-travel" solutions is an essential part of this process.	Noted. The Local Plan and the London Plan have stringent policies on car parking, promoting car free development in accessible locations and 'car lite' development elsewhere. This is assessed through the Development Management processes and is supported by Travel Plans and Transport assessments. These measures along with others within the draft Local Plan are and will continue to reduce car borne traffic generated by new development.	No change.
	2	TR 01	I am deeply concerned by the lack of commitment to cycling - including a reluctance to incorporate cycling facilities where it would be easy to do so (e.g. where you are trying to narrow a road anyway you could put in a bespoke bike lane instead of widening the footpath). The fact that this didn't happen when you recently overhauled Crofton Park centre was a significant shame - as a cyclist I'm now faced with weaving between cars and vans through the centre on my way to work. This is a mistake that needn't be repeated. More generally, there's just a real lack of commitment to make bespoke bike lanes.	Noted. The Local Plan sets out the broad objective and development management policies to promote walking and cycling in the borough. The Local Plan is supported by the Transport Strategy and Local Implementation Plan (LIP) and Lewisham Cycling Strategy. These documents outline how the Council will work with TFL and other key stakeholders to improve Lewisham's cycling infrastructure and provides detail of local priorities and targets.	No change.
Blackheath Society no 2	2	TR 01	**TR1 Sustainable transport and movement**. We strongly support the policy aim, which seems sensible overall.	Support noted.	No change.
Blackheath Society no 2	2	TR 01	**TR1** . It would be helpful if the Timeframes in Table 12.1 were explained more clearly (date ranges) and an indication of likelihood of delivery (especially in terms of cost/financing) was added, as well what degree of influence LBL has over whether schemes go ahead. The listed schemes are deemed 'critical to the delivery of the spatial strategy for the Borough' para 12.3..	Noted. Further details are set out in the Infrastructure Delivery Plan. The intention of this table is to set out key priority projects to support the delivery of the spatial strategy.	No change.
Blackheath Society no 2	2	TR 01	**TR1**. In respect of I, where there are identified capacity issues, planning permission should be contingent on provision of the necessary public transport (1) with a high degree of certainty and (2) in time to relieve existing and forecast capacity issues, as well as to cope with any addition to them caused by occupation of the scheme. This has NOT been the case for a number of recent approvals in Lewisham town centre.	Noted. The draft Local Plan policy TR1 includes a reference to London Plan policy TR4 (Assessing and mitigating transport impacts). This will help to ensure conformity with the London Plan on this matter. Previous planning decisions are outside the scope of the Local Plan.	No change.
Brockley Better Streets	2	TR 01	Chapter 12 of Part Two (Transport and Connectivity) states the aim of reducing car use. Chapters 8 (Economy and Culture) and 11 (Sustainable Design & Infrastructure) support this by noting the benefits of "walkability", the urgency of climate change	The Local Plan is a strategic policy document that provides guidance for future development. It contains policies which support the London Plans aspiration for significant modal shift.	No change.

			and the air quality problem in parts of the Borough. Despite this, the draft includes no credible measures for reducing car use and improving walking and cycling infrastructure. Many of the measures proposed, such as improvements to stations and bus stop infrastructure, are already in place in the areas worst affected by car congestion – it is notable that the areas shown in Figure 12.1 as having the best PTALs also have the worst traffic congestion, parking congestion and air quality in the borough and are the least walkable. The Council must consider more effective measures to reduce the environmental and health impact of car use in Lewisham, such as: Creating low-traffic neighbourhoods that are protected from motorised Through-traffic (as proposed by London Living Streets in response to the Councils consultation in November 2018). Increasing the use of non A & B roads for pedestrianised entertainment / retail areas / pocket parks. For example, the immediate vicinity of Brockley station has been temporarily pedestrianised to allow local cafes and restaurants to offer socially-distanced outdoor seating. This has been very successful and 2 should be made permanent. Furthermore it should be considered as a role model for other similar areas.	The plan also identifies a number of infrastructure projects to improve public transport within the borough. With regard to walking and cycling the Local Plan is underpinned by more detailed strategies such as the cycling strategy, transport strategy and Local Implementation Plan which have further detail on transport projects. Further information on the councils approach to LTNs can be found on the Council website	
Brockley Better Streets	2	TR 01	We note that other London boroughs have made significant progress in these areas over the last 18 months, successfully rebalancing road use away from cars towards cycling, walking and public transport. Proven templates exist that can easily be applied throughout the Borough as well, in particular in Brockley and Ladywel wards, where the traditional residential road grids in the conservation areas were designed to support local means of transport. These residential roads were never designed to support rat-running car traffic looking for the shortest route from A to B, which is always to the detriment of all residents along those routes.	Information on the councils approach to LTNs can be found on the Council website	No change.
Hither Green West Campaign Group	2 3	TR 01 LCA	Low Traffic Neighbourhood (LTN) for Hither Green West. The Plan notes the highly residential nature of Hither Green West but does not explicitly state our residential streets should be for people, not for cars. We want to reclaim our unclassified residential streets from commuter through traffic, to create spaces outside our homes where children can play and people can meet with their neighbours. Hither Green West campaign group fully supports the Council's drive to develop quieter, safer residential streets and to promote active travel. We have presented separately to Lewisham Council proposals for an LTN here, which, to date, is supported by a 765 signature petition. See: https://you.38degrees.org.uk/petitions/hither-green-west-catford-north-cell Creating a Low Traffic Neighbourhood here would:	Noted. The draft Local Plan broadly supports these aims, as helps give effect to the London Plan target for 90% of journeys made in inner London by walking, cycling and public transport. Low Traffic Neighbourhoods are outside the scope of the Local Plan. Comments will be forwarded to colleagues in Council's transport service. Further information on the councils approach to LTNs can be found on the Council website	No change.

			Extend to Hither Green West the benefits of quieter, safer streets which are currently being experienced by their neighbours in Lee Green. • Remove up to 5 million vehicle movements and 400 thousand lorry movements from Hither Green Lane alone. • Resolve the significant increase in traffic volumes on Hither Green Lane and their attempts to use the very narrow junction to exit onto the South Circular, and the negative knock-on negative impacts on nearby narrow residential roads such as Torridon Road, Springbank Road, Ardgowan Road and Minard Road etc. • Would create a flagship low traffic neighbourhood with Hither Green Train Station symbolically at its heart.		
London Wildlife Trust	2	TR 01	We support in principle this policy. However, in Part E (or supporting para 12.5) we would suggest explicit reference to Policy GR3 as well; cycling infrastructure in our experience is not necessarily biodiversity sensitive in its design or location, and new routes need to take much better account of the needs of some wildlife.	Support noted.	Supporting text amended to include a point about public realm and open spaces and biodiversity sites.
Port of London Authority	2	TR 01	**9. Policy TR1: Sustainable Transport and Movement.** Support the reference to the promotion of the use of the river for passenger transport within the policy	Support noted.	No change.
South East London Labour for a Green New Deal	2	TR 01	"There is a need to support the modal shift away from use of the private car, in light of the London Plan target for 80% of all journeys in London to be made by non-car modes by 2041, including by supporting a more compact urban structure with a well-linked network of places and finer grained integration of land uses." Does Lewisham have a traffic reduction target and how will it get there? What about HGVs which are highly polluting? The plan could be stronger on the need for major developments, construction and deliveries to provide freight consolidation strategies, potentially connecting with London-wide facilities and working with neighbouring boroughs where possible.	Noted. The London Plan sets a target for 90% of all journey in inner-London to be made by walking, cycling and use of public transport. The Local Plan helps give effect to this target with policies centres on encouraging modal shift and reducing car use. Draft Local Plan Policy TR5 Deliveries, servicing and construction addresses the points raised. The specific nature of proposals will be considered on a case by case basis as new development comes forward.	No change.
South East London Labour for a Green New Deal	2	TR 01	Similarly north-south directions in Lewisham are better served by public transport and east-west connections are also poorer; as a result far more trips are made by car and motorcycle to compensate for these deficiencies. Apart from increasing traffic, it also increases inequality as poorer people are far less likely to own cars. Reducing this car use depends not only on the BLE but also on improving bus and Network Rail services in these areas of poor PTAL (for example the riverside area where significant development is planned). They are similarly threatened by the funding crisis and because money is being spent on the Silvertown Tunnel which could be spent on these services. It could also be spent on decarbonising the bus fleet.	Noted and agreed. The draft Local Plan therefore includes policies which seek to improve public transport access across through Borough. The Council will continue to work with the Central Government, Mayor of London and developers to secure funding for new and improved transport infrastructure.	No change.
Telegraph Hill Society	2	TR 01	A key policy should be that any proposals to reduce traffic flows which have an effect on the redistribution of traffic across other roads should not result in an increase in traffic on roads which are primarily residential roads, etc. It was said	The Local Plan is seeking to support the London Plans target of modal shift over the plan period. To reduce car traffic and increase more sustainable modes.	No change

			during the on-line consultation sessions that there was no intention to divert traffic away from the main roads onto residential roads, but extreme care must be taken in this respect to ensure that it does not unintentionally do so. If traffic calming measures result in the creation of bottlenecks or a significant slowing of the traffic flow, it is naïve not to anticipate that through traffic, assisted by sat. nav. technology, will find alternative routes through residential streets. Attempts to block off those alternative routes merely cause the same problem elsewhere. The issues with some of the COVID-19 related traffic schemes have graphically illustrated these problems, with some residents caused to suffer additional traffic, noise and air pollution, in order to "calm" other roads. The policy should therefore expressly set out that the Council will not approve schemes (development schemes, traffic "calming" schemes or otherwise) that result in an increase in traffic on residential roads and that any proposed scheme will be required to demonstrate by robust, well-informed and transparent modelling that there will be no such effects. The Council should further require before-and-after studies for any implemented schemes with a commitment to reverse or modify such schemes if the modelling proves to be incorrect.	Any proposals for road improvements will be thoroughly assessed so they do not have an adverse impact on residential streets.	
Telegraph Hill Society	2	TR 01	Specifically, in the context of paragraph 211 and Telegraph Hill, the Plan includes a proposal to remove the A2 New Cross Road/Amersham Gyratory system and we would hope that the modelling for this does not show an increase in traffic already voiding the system by using Telegraph Hill to access the A2 from the A21. We understand that this issue is already a matter of discussion between the Council and the Malpas Road Healthy Streets Group. We will strongly resist any proposal to modify that traffic system which results in an increase in traffic through Telegraph Hill.	Outside the scope of the Local Plan.	No change
Telegraph Hill Society	2	TR 01	As noted in our general comments in paragraphs 200 and 201 above, a major shopping issue with connectivity from New Cross Gate and Brockley is the lack of cross-Borough rail links to Lewisham and Catford. At present, in effect, the Borough is divided into two in terms of access by rail. Whilst, for New Cross Gate the link to Lewisham will be improved when the first stage of the BLE is built, the other issues will remain. The creation of a linking station at Brockley would be extremely useful in this regard and is considerably cheaper to implement than the BLE. We have been lobbying for this for at least 20 years with no success to date.	The Local Plan has been prepared in collaboration with our transport team and informed by evidence base documents such as the Transport Assessment, Rail Strategy etc. The Council acknowledges the current issues with east west public transport connectivity and is working with transport providers to make improvements.	No change.
Telegraph Hill Society	2	TR 01	We are pleased to note **TR1.I** which, given the concerns over the pre-pandemic levels of overcrowding on the platforms at New Cross Gate station, we strongly support.	Support noted.	No change.
The St John's Society	2	TR 01	The 15-minute city would help promote local amenities and reduce car dependence.	Noted. The spatial strategy broadly supports this approach however it is acknowledged that this could be made more explicit.	Local plan amended to refer to 15-minute neighbourhood

					approach in supporting text to Policy OL1.
The St John's Society	2	TR 01	Rail infrastructure improvements needed urgently – accessibility, orbital connectivity, station improvements. Lewisham station needs a complete overhaul – the 'interchange upgrade' must not be dependent on the BLE going ahead.	Noted. Rail infrastructure improvements are signposted in the key list of priority projects in Policy TR1, and also listed in the Infrastructure Delivery Plan. The Local Plan is not contingent on the Bakerloo line extension however it does set the policy framework to enable its delivery.	No change.
The St John's Society	2 2	TR 01 TR 03	How will Lewisham Way (A2) realistically become a low / traffic route / healthy street? Much conflict between being a busy arterial route and the need for reducing local and overall pollution from traffic. Objectives like the above will require reallocation of road space to public transport/pedestrian/cycling – more commitments needed. Needs to be a strategy for e-scooters and cycling effect on pedestrians and pavements. There is not enough capacity for both. There needs to be an overall strategy for reducing car dependency and therefore traffic and air pollution.	We recognise that some streets will still function as roads for carrying significant volumes of traffic. However we also believe that these streets can still be significantly improved to make the walking and cycling more attractive.	No change.
Transport for London	2	TR 01	We support the objectives cited for Lewisham station and interchange, and the provision of platforms at Brockley High Level. New Cross to Lewisham Overground extension: TfL does not currently support this scheme, as we do not consider that it is justified on its merits. We have concerns about adverse impacts on other rail services as a result of implementation of this scheme; this would entail reductions in capacity on Southeastern services which are considered to have greater utility. Equally, significant new infrastructure would be required, which is not good value for money, given that East London line (ELL) services can already be accessed from Lewisham through a single interchange at New Cross, and the service between the two stations is frequent.	Noted. The New Cross to Lewisham Overground route is an aspiration set out in Lewisham's Vision for Rail, which the draft Local Plan reflected. This will be removed from the strategic transport priority list in the Local Plan, however the Council will continue to engage with GLA/TfL to understand and investigate feasibility of delivering this and other key transport projects.	Table 12.1 amended to remove the New Cross to Lewisham Overground extension scheme.
Transport for London	2	TR 01	We welcome the policy explanation to safeguard sites for construction and delivery of the critical transport improvements and permanent infrastructure, to enable the Borough to deliver its spatial objectives. A distinction should be made between safeguarding as a matter of planning policy, and the formal safeguarding directions made by Secretary of State (Transport) on 1 March 2021 in respect of the BLE. They are a material consideration for any planning application which falls within the safeguarding limits. In relation to policy safeguarding on a strategic basis via	Noted.	Local Plan policy and supporting text amended as suggested.

			the London Plan, and at a more detailed local level via this local plan, we think further specificity is desirable. In particular, the draft local plan is not sufficiently granular and should set out more clearly the reasons for safeguarding for the BLE, and the implications thereof, on a site by site basis. This should cover stations, work sites, the line and corridor, and associated works. (TfL can provide more detail upon request.) While the purpose of safeguarding and how it will benefit the borough is mentioned in the area visions, reference should be made to the formal safeguarding directions, and the definition of 'Safeguarded Area' should be added to TR1, TR2 or OL1. An example of appropriate wording is provided below. **'The Secretary of State has made formal safeguarding directions for the Bakerloo line extension which will support the project in safeguarding sites and routing alignment. The Bakerloo line extension will make a higher number of homes possible within the existing Opportunity Area and that proposed at Bell Green/Lower Sydenham. As such, the extension is a catalyst for change, providing an opportunity to enhance the transport offer at Lewisham town centre which will support and enable growth while also enhancing the public realm and connectivity. At Lewisham, it will also provide an improved strategic public transport hub with improved National Rail and DLR stations and bus services. The directions require the local planning authority to consult TfL on planning applications within the safeguarding zone'.** Suggested additions for TR1 paragraph C and F: 'C The land, buildings, space and supporting infrastructure required for the construction and operation of Lewisham's network of strategic and other transport infrastructure will be safeguarded, including for the schemes identified in Table 12.1. New development proposals will be required to provide adequate protection for, and respond positively to the need to facilitate the delivery of the Borough's network of transport infrastructure. **To support the Bakerloo line extension, developments will not preclude or delay the delivery, will not lead to excessive cost in the delivery, and must be compatible with the BLE (e.g., in relation to vibration from the tunnels), both during construction and in operation. Foundation and basement design will be particularly critical for over tunnel alignments, ground level needs at stations and for other work sites.'** 'F Transport Assessments, Transport Statements and/or Travel Plans must be submitted with applications for Major development and other development proposals that are likely to impact on the capacity and functioning of the transport		

			network (including the walking and cycling networks**, <u>deliveries and servicing, and the Bakerloo line extension</u>**)….' The formal safeguarding zone is now publicly available (https://content.tfl.gov.uk/ble-safeguarding-plans-march-2021.pdf), so we recommend these limits, specific sites and routing of any new infrastructure are set out in the policy maps.		
Transport for London	2	TR 01	G - Clarify that 'B' also includes walking and cycling transport infrastructure, as it could be understood to be limited to just public transport. TfL should be clearly identified as a consultee to evaluate the impact of development on transport infrastructure in addition to being consulted for alternative mitigation measures.	Agreed.	Local Plan amended with clarifications, as suggested.
Transport for London	2	TR 01 Para 12.3	TR.3 should just state Bakerloo line extension, as the point is valid regardless of whether the scheme terminates at Lewisham or Hayes and Beckenham Junction. A suggested edit is below. '12.3 The Bakerloo line extension ~~<u>to Hayes and interchange upgrades at Lewisham and Brockley stations are noteworthy as they are is</u>~~ vital to ensuring the development capacity of sites is optimised, and to addressing the increase in passenger demand arising from London's growth'. This statement in 12.3 is incomplete: 'An indicative list of strategic transport schemes is set out in...'	Noted.	Local Plan amended as suggested.
Transport for London	2	TR 01	In paragraph D, add the item below to the list: **'d. Expansion of cycle hire'**	Agreed.	Local Plan amended as suggested.
Telegraph Hill Society	2	TR 01	The site considerations also need to take into account transport capacity issues, particularly with reference to **TR1** and, specifically, **TR1.I.**	Noted. Policy TR1 will need to be considered alongside the site allocations for planning applications and decisions, and it is not considered necessary to include additional site considerations in this respect. The plan must be read as a whole.	No change.
Transport for London	2	TR 01 Figure 12.2	The 400m catchments around the stations in Figure 12.2 are not justified. If they are intended to be walking catchments, then a 960m walk network (12-minute walk and that used in PTAL) or 800m crow flies (consistent with the London Plan and a proxy for a networked 960m catchment) would be more appropriate. In addition, Figure 12.2 shows a BLE catchment around St John's station. This station is not a proposed BLE station and thus should not have a catchment around it. This will remain a National Rail station.	Noted. The 400m catchments have been included on the map to illustrate the area to which draft Local Plan Policy TR02.C relates. However for clarity the map will be amended to show the BLE phase one and indicative phase 2 routes only.	Diagram 12.2 amended to remove 400m catchments around stations.
	2	TR 02	The Bakerloo line extension has been shelved. This new reality needs to be reflected in the final edition of the plan and not be used as an excuse for overly intensive developments.	Noted. The Council is a strong advocate of the BLE and the benefits that this will bring to Lewisham residents. The BLE is included in the London Plan as a key transport project, which is also reflected in the Local Plan. We will continue to work with TFL and other key stakeholders to promote the strong business case and placemaking benefits of the BLE to secure future funding.	No change.

				However it is important to note that the planned growth within the draft Local Plan is not predicated on the delivery of the BLE. The housing figures and resulting population growth set out in the London Plan for the borough has been tested by TFL through the London Plan process and through Lewisham's Transport assessment which accompanies the Local Plan. These both demonstrate that there is sufficient capacity across existing and committed improvements to the transport network to accommodate this growth. This is outlined in Part 1 section 3 of the draft Local Plan Spatial strategy options and the preferred approach.	
	2	TR 02	The main positive from the LLP is the central preservation of the Bakerloo Line Extension as it's central premise and the safeguards the area currently owned by Sainsbury's for the construction and excavation of the tunnels.	Noted.	No change.
	2	TR 02	Delivery of the Bakerloo Line the New Cross appears include a mass housing project on top of the planned station. The LLP appears to be obsessed with an exaggerated residential development that is justified by the arrival of the BLE. There is much less emphasis retail or business opportunities. More over there is also an absence of green or public space, which is mentioned on the LLP but contradicted by the proposal to home vast number people on top of the Bakerloo Line Extension. The site cannot satisfy all needs. It cannot be a transport hub, mass housing project, retail estate and urban meeting place. Planners have to be realistic in what the site can be used for.	The site allocation for the former Hatcham Works, New Cross Road site in the draft Local Plan was informed by the New Cross Development Framework. This study outlines the aspirations for the site as a new mixed use, urban development which incorporates a new BLE station, employment and other main town centre uses. Given the sites excellent access to public transport and local facilities it is envisaged that the site will be fairly high density. Details can be found in the New Cross Development Framework.	No change.
Blackheath Society no 2	2	TR 02	**TR2 Bakerloo line extension**. See first points above under proposals and TR1. We agree that developments should facilitate and safeguard and not preclude, prejudice or delay development of the BLE and particularly its stations. Developments in proximity to BLE sites should also be phased appropriately to assist with this. However, they should not require that it will delivered, or be 'optimised' on the basis that it will be delivered by 2030, as that is uncertain.	The London Plan makes clear that where development proposals are emerging and transport investment is not yet fully secured, delivery of the long-term capacity for homes and jobs will need to be phased in a way that maximises the benefits of major infrastructure and services investment whilst avoiding any unacceptable effects on existing infrastructure before schemes are delivered. The draft Local Plan policies are considered to be consistent with the approach.	No change.
Deptford Society	2	TR 02	**Page 447** TR2 What is the council's fall-back plan if delivery of the Bakerloo Line Extension is significantly delayed or even cancelled?	The Council is a strong advocate of the BLE and the benefits that this will bring to Lewisham residents. However the planned growth within the Local Plan is not predicated on the delivery of the BLE. The housing figures and resulting population growth set out in the London Plan for the borough has been tested by TFL through the London Plan process and through Lewisham's Transport assessment which accompanies the Local Plan. These both demonstrate that there is sufficient capacity across existing and committed improvements to the transport network to accommodate this growth.	No change.

				This is outlined in Part 1 section 3 of the draft Local Plan Spatial strategy options and the preferred approach.	
Lewisham Cyclists	2	TR 02	Bakerloo Line Extension - we're supportive of the extension (as mentioned at consultation) but consider cycle hubs are needed at strategic interchanges, especially New Cross, Lewisham, and Catford. Secure cycle parking is essential to promote onward public transport access and avoid the current car park dominated areas outside stations. We believe this should be provided as part of S106 agreements for all development within 100 metres of a station entrance.	Agreed.	Requirement for a cycle hub included within site allocation – Former Hatcham Works site. Borough-wide cycle parking policies updated in line with the London Plan and London Cycle Design Standards, including reference to the higher standards for inner-London.
London Borough of Bromley	2	TR 02	Draft policy TR2 states that development proposals on sites located within 400m (5 min walk) of a proposed Bakerloo Line Station must demonstrate that development will not preclude or delay the delivery of the Bakerloo Line extension. While we have no objection to this policy, we note that this buffer could in some instances crossover into Bromley. While Lewisham policy would not be relevant to applications within Bromley, we would welcome an explicit reference in the supporting text noting that the policy has no relevance where the buffer crosses the Borough boundary.	Noted. The approach is considered to be in general conformity with the London Plan.	Policy supporting text amended as suggested.
London Borough of Southwark	2	TR 02	LB Southwark is supportive of the Bakerloo Line Extension. Policy TR2 Bakerloo Line Extension is supported. Southwark will continue to support Lewisham in supporting the business case for the Bakerloo Line Extension in order to unlock a greater number of jobs within Southwark and Lewisham. With regard to allocation of land for uses and delivery, the general approach taken by Lewisham is supported.	Support noted.	No change.
South East London Labour for a Green New Deal	2	TR 02	The local plan to reduce car use appears very dependent on the Bakerloo Line Extension (BLE). Following Covid and the financial crisis at TfL the BLE is on hold and may not go ahead. However the Silvertown Tunnel is going ahead at a cost of £2b. Lewisham initially opposed the Tunnel because of concerns it would increase traffic on the A2 and South Circular, but have failed to voice opposition in recent months. All evidence is that Silvertown will increase traffic through Lewisham via the induced traffic effect, at a time when Lewisham are committed	Noted. The Local Plan is not contingent on the delivery of the BLE. A Transport Assessment of the Local Plan will be prepared and published as part of the evidence base.	No change.

			to a rapid reduction. Additionally it will open lanes specifically for HGVs, increasing this traffic flow across south east London		
Telegraph Hill Society	2	TR 02	We also strongly support policy **TR2.C** given the previous proposals to build on the Hatcham Works site which could, if they had gone ahead, have jeopardised the construction of the line.	Support noted.	No change.
The St John's Society	2	TR 02	TRANSPORT & CONNECTIVITY The Bakerloo line extension is stated as 'fundamental' to the borough's transport strategy, but it is far from being a certainty, and its fate is beyond LBL's control. What are the alternatives being considered for the borough if the project fails to materialise?	Noted. The Local Plan is not contingent on the delivery of the BLE. Part 1 of the Draft Local Plans set out a number of options considered for the spatial strategy, including options without the BLE. This is discussed further in the Integrated Impact Assessment.	No change.
Transport for London	2	TR 02	This policy supports the BLE wholeheartedly and is welcomed. Wording has been put into the policy regarding the potential need to phase development to avoid excessive strain on the existing public transport network. It would be beneficial to understand clearly how phasing might work, as it is not stated within the local plan. A map should be included showing the definitive formal safeguarding area for applications, on which TfL must be consulted under the formal safeguarding directions. Safeguarding matters, as discussed above, should be incorporated further into the local plan. Developments along the route alignment and above proposed BLE infrastructure will require their foundation and basement and other below ground works design, noise and vibration mitigation discharged by the Council and following consultation with TfL. This is common practice and reflects the procedures agreed with the London Borough of Southwark, and some development in Lewisham as done with Carpetright. The benefits of BLE set out here are good, but the text could also link them to sustainability and other environmental benefits including reduced carbon emissions and improved air quality (due to the BLE enabling more public transport journeys). This should also be noted in local plan policy SD6 (Improve Air Quality).	Support noted.	Local Plan amended to include new Schedule in Part 5 – formal safeguarding area. Safeguarding requirements have been amended to reflect suggested wording in previous comment. Also policy amended to make clearer arrangements for phasing of development. Text added to supporting text of policy TR2 Bakerloo line extension to highlight link between BLE and environmental benefits.
	2	TR 03	1. I support all moves to improve air quality and ease of movement and access for walkers and cyclists.	Support noted.	No change.
	2	TR 03	5. Drakefell Road is on the B2142. It needs to have the speed limit of 20mph enforced better. More speed cameras. I also think more signage on A roads that Drakefell Road is impassable, with a width-restrictor gate, to vehicles with an	Noted. Speed limits, road signage and restrictor gates are outside the scope of the Local Plan. We will pass your comment onto the transport and highways team.	No change.

			axel width greater than 7.7feet would stop the frequent problem of HGVs passing through having to U-turn at the gate.		
	2	TR 03	Policy TR3 would be strengthened if the Council developed a strategic understanding of how each major development can contribute to a network of cycling infrastructure and tailored its masterplans and planning requirements accordingly.	The Local Plan provides details on key walking and cycling routes in Fig 12.4 supporting Policy TR3 Healthy streets as part of health neighbourhoods. This in turn feeds into Lewisham Links policies where development proposals will be expected to facilitate the creation and enhancement of the Lewisham Links, a connected network of high quality walking and cycle routes linking key routes, public open spaces and other key destinations. This is then fed into individual site allocation development requirements.	Officers have reviewed the Lewisham Links policies and strengthened development requirements within site allocations to contribute to the coordinated delivery of these routes
	2	TR 03	The almost religious fervour of cars bad walking/cycling good is not matched, we believe by the average resident. Yes we want more areas top walk and cycle BUT not at the expense of ambulances/fire engines being able to get at speed to people in need. The LTNs aren't working and are moving solution to another area. Our neighbours are 88 and 90 will they be expected to walk or cycle?	Noted. Low traffic Neighbourhoods are just one of many measures that Local authorities are exploring/utilising to make it safer to travel by foot or by bike and contribute to the achievement of the London Plan target for 80% of all Journeys in London to be made by walking, cycling or public transport by 2041. LTNs are however outside the scope of the Local Plan. We will pass your comments on to our Transport and Highways team who are currently working on the LTNs.	No change.
	2	TR 03	Traffic calming The residential areas of Lee Green and Hither Green are flanked by some of the busiest roads in South London. Cycling is still dangerous on these surrounding roads and speeding is rife on the side roads still open. LTNs have started to help to readdress this but more is needed. Infrastructure is needed to change behaviour to calm speeding and encourage more cycling where possible. The speeds the cars travel within side roads is prohibitive to young families cycling together as is the inability to traverse the crazily busy main roads. I appreciate cars still need to use roads but a levelling of the playing fields will allow everyone to travel safely. The Local plan should look at how the council can place the emphasis on TFL to address the traffic that is using the roads they have responsibility for.	For arterial routes, also known as 'red routes' that fall under the ownership of TFL, the Council will continue to work with TFL to improve these corridors for cycling and public transport provision.	No change.
	2	TR 03	Questions: What is meant by 'Healthy streets'? You mention this phrase a number of times in the 'Local Plan' vision. To take one of your examples: Transform the South Circular (A205) and Brockley Rise / Brockley Road (B218) into 'healthy streets' with public realm improvements that make walking, cycling and use of public transport safer and more convenient.	A definition of the Healthy Street approach is outlined in the explanatory text to Policy TR3 para 12.13 onwards. The Local Plan together with the supporting Transport Strategy and Local Implementation Plan outlines how the council will contribute to the London Plans target of 80% of all Journeys in London to be made by walking, cycling or public transport by 2041.	No change.

			This seems to suggest that the South Circular, among the most important arteries in the area, is going to be carved up for cyclists and walkers? Surely Emergency vehicles must have unfettered access everywhere, be they fire engines, ambulance and/or police. If making places cycle safe relates to the closing of access to whole parts of the streets this will backfire. It has become clear that blocking roads, or narrowing them down substantially to create 'pedestrian and/ or cycling friendly areas'… is a failure. Traffic is merely shunted onto other streets and these become dangerously congested, with the same number of cars producing considerably more pollution than before. This is because as we all know: -Moving traffic reduces pollution while static, static and congested traffic increases it!, even with the same number of vehicles. EXAMPLE: The best recent example is the fracas around the Elephant and Castle. Removing bus lanes and car lanes to create vast cycle lanes that have, at best, a handful of mostly young cyclists, has simply meant that there are row-upon-row of buses, with large numbers of people aboard, (pre-pandemic, it was around 60 per bus) vans and cars bumper- to-bumper, barely moving, producing phenomenal amounts of pollution. This is clearly a planning failure. Cycle lanes do not need to be wider than 1 metre, max 2 metres if you want to have crossing points going in opposite directions. A whole (CAR) lane wide is absurd and causes more problems than it solves. Results: When bus lanes were first introduced, as a car driver, I was not happy. But I rapidly saw the benefits, as I realized that buses had become a genuine alternative to the tube. They could be reliable and fast. From New Cross Gate into town, for instance, the journey became a 30-minute trip, instead of the best part of an hour, as before. Sadly, since a myriad of cycle lanes started grabbing a lot of the space originally used by the bus lanes, I find I have had to revert to the tube, as the buses are no longer reliable. Being stuck on a bus, while three cyclists saunter past on a huge empty cycle lane is not a good feeling, to say the least! In many German cities, most pavements are slightly wider, with a green-coloured cycle path along them, that measure about a METRE wide- This is for cyclists. Pedestrians soon learn not to walk on the green stripe- Interestingly, this I have seen along the Old Kent Road going up to the Elephant & Castle, Very useful, effective and safe. However, if you are going to encourage cyclists then I suggest they should: - 1. Have number plates so that they can be fined, like cars, for infringing the Highway Code. We are all fed up watching	Details of how cycling infrastructure will be delivered in the borough and in particular along key arterial routes will be brought forward with key stakeholders following Transport for London guidance. This includes following stringent guidance on emergency vehicular access.	

			cyclists break the highway codes time after time with no penalties! 2. Basic 3rd party insurance as it has been shown that they can cause death. 3. A basic cycle-driving licence- This can be just a case of learning the Highway codes, the existence of which too few cyclists seem aware of.		
	2	TR 03	It's shocking that we can't find any plans for you to improve the experience for pedestrians to have beautiful, spacious, unpolluted and safe walking access across the borough….and local people will remain in cars until you do.	Noted. The Local Plan is a strategic document which sets out the council's aspirations and policies for managing change and growth within the borough. It includes policies setting out requirements for developments to deliver new and/or improved public realm, in accordance with the Healthy Streets Approach in the London Plan. Details on local priorities and projects can be found in the Transport Strategy and Local Implementation Plan (LIP) which forms a key evidence base for the draft Local Plan.	No change.
	2	TR 03	CS4 is slowing extending towards Greenwich, which is great and well over due, but I hope that this extends south at some point south through Lewisham borough towards Bromley / Crystal Palace.	Noted.	No change.
Blackheath Society no 2	2	TR 03	**TR3 Healthy streets as part of healthy neighbourhoods**. We support the aim of the policy. We have concerns about how to reconcile the conflict of maintaining flow along major movement corridors, especially those controlled by TfL (A2, A20, A21, A205) with improving walking/cycling/buses, reducing pollution and noise, and creating sense of permeable local places & neighbourhoods of high quality public realm and amenity. The same applies to minor but still busy movement corridors like the B212 through Blackheath. The draft Plan does not acknowledge this conflict or indicate how it is to be resolved when planning decisions are being made.	We recognise that some streets will still function as roads for carrying significant volumes of traffic. However we also believe that these streets can still be significantly improved to make the walking and cycling more attractive. TFL/GLA have detailed guidance on how this can be achieved	Policy amended to make reference to guidance on Healthy Streets.
Blackheath Society no 2	2	TR 03	**TR3**. No mention of Low Traffic Neighbourhoods (LTNs) anywhere in the document, despite their relevance to healthy and safe streets ('liveable neighbourhoods', 'active neighbourhood' and their topicality and indeed controversial status in Lewisham and other boroughs during the covid pandemic. A key issue for LTNs is adequate consultation with residents, with neighbouring boroughs if near a borough boundary (e.g. South Row/Kidbrooke Gardens SE3), and with TfL if near a main route controlled by them (ditto). This is because of their tendency to displace rather than reduce traffic, at least in the short term. Also no mention of School Streets initiative.	Noted. Low traffic Neighbourhoods are just one of many measures that Local authorities are exploring/utilising to make it safer to travel by foot or by bike and contribute to the achievement of the London Plan target for 80% of all Journeys in London to be made by walking, cycling or public transport by 2041. LTNs are however outside the scope of the Local Plan. We will pass your comments on to our Transport and Highways team who are currently working on the LTNs.	No change.
Brockley Better Streets	2	TR 03	Effective, concrete measures for eliminating rat-runs and reducing commuter car use needs to be included in the plan. Road infrastructure in the borough is currently biased towards car use and this needs to be re-balanced urgently. In particular, reducing the flow of vehicle commuter traffic on roads, between outer and inner London should be a specific target. This should be aligned to the London-wide target to	Noted. The draft Local Plan broadly supports modal shift and re-balancing road use as suggested. Further details on the strategic approaches are set out in the Part 2 Transport policies. Details on local priorities and projects being taken forward by the Council can be found in the Transport Strategy and	No change.

			reduce motorised traffic on roads for the Borough and for the Brockley/Ladywell wards specifically.	Local Implementation Plan (LIP) which forms a key evidence base for the draft Local Plan.	
Deptford Society	2	TR 03	**Page 451** TR3 Significant improvements to bus or cycle journeys will require reallocation of road space and measures to calm/curb vehicle use. This section contains little in terms of commitments to reallocating road space.	Noted. Detailed infrastructure improvements for individual schemes are assessed at application stage when more detailed assessments can take place. Details on local priorities and projects being taken forward by the Council can be found in the Transport Strategy and Local Implementation Plan (LIP) which forms a key evidence base for the draft Local Plan. For arterial routes, also known as 'red routes' that fall under the ownership of TFL, the Council will continue to work with TFL to improve these corridors for cycling and public transport provision.	No change.
Hither Green West Campaign Group	2 3	TR 03 LCA	TRANSPORT AND PUBLIC REALM – see also Annex A for further information. The Hither Green West campaign group would also like to see concrete proposals to transform Hither Green Lane into a truly 'Healthy Street' with public realm improvements. These public realm improvements should focus on ensuring walking and cycling and use of public transport safer and more convenient and make it a more pleasant place to shop and socialise. Lewisham has the worst Healthy Streets score of any inner London Borough, and there is an urgent need for a rebalance to prioritise walkers, cyclists and public transport users in Hither Green West. Hither Green Lane should be a strategic walking and cycling corridor connecting communities directly to Catford and Lewisham centres, but our main route through the area is car-dominated. Our residents shouldn't be fearful of crossing Hither Green Lane, choking on pollution outside their homes and our kids unable to play outside just because Google Maps tells truckers and Kent commuters it's 2 minutes 7 faster than using the South Circular. Our residential roads should not be used as a free carpark for commuters continuing their journey into London by train. The car-dominated South Circular also bounds Hither Green West, detracting from our neighbourhood's highly residential, characterful nature. There is an absence of sense of arrival into a residential area, especially at the entrances to Hither Green West from the South Circular, at Hither Green Lane, Torridon Road, Stainton Road, and Laleham Road. Where car use remains essential, it should be environmentally friendly, but there are only three on-street electric car charging points in Hither Green West (see Annex A) The Plan highlights a key part of the Borough's character are residential areas and the need to create "safe and attractive public spaces that are accessible to all". It suggests the delivery of "high quality and effectively managed public realm… both encourages and enables	The Local Plan is a strategic policy document that sign posts key infrastructure required to accommodate the level of growth anticipated across the borough. Its remit and scope is proportionate to a high level strategic planning policy document, and not necessarily to provide concrete proposals on specific transport schemes. We will however pass on your comments to our transport team for consideration in the Transport Strategy and Local Implementation Plan.	No change.

			convenient movement by walking and cycling". However, the Springbank Road entrance to the train station lacks a safe pedestrian crossing, despite being used by thousands of people daily. Torridon Road and Brownhill Road's junction lacks a pedestrian crossing despite several children and elderly adults being killed attempting to cross here. Our main commercial centre, Hither Green Lane, could benefit from many more and safer crossing points. Decades of under-investment in the public realm in Hither Green West have resulted in narrow, uneven and poorly maintained pavements, unregulated and on-pavement parking (including in front of all our shopping parades on Hither Green Lane), and many unsightly residential wheely-bins on pavements and busy roads which cannot be stored off-street. Also, a complete lack of public seating and places for elderly or disabled people to rest, a lack of tree cover and landscaping, all result in a poor pedestrian experience and hinders people with reduced mobility. Cycling is discouraged by the lack of cycling infrastructure, lack of protected cycle lanes and absence of on-street cycle storage facilities. All this is exacerbated by a lack of pedestrian and cycling connections across the railway lines, which often makes otherwise short local journeys on foot or by bike significantly longer. *LB Lewisham officer note: Annex A: Examples of lack of investment in 'Healthy Streets' infrastructure in Hither Green West is included in the original representation. It provides details on on-street cycle storage, trees, benches, electric car charging stations and Mountsfield Park.*		
Lewisham Cyclists	2	TR 03	We also support Policy TR3 and the aim of providing Health Neighbourhoods (HN). Again, there is a significant gap between what has been provided so far (1) and the need which we estimate to be over 100. Similarly, very few modal traffic filters have been installed in the Borough. Pre-pandemic it was one (Prince Street, Deptford) which represents the total number of filters (bollards/planters) installed in the last quarter century. During the first phase of the pandemic other emergency filters were installed but half have since been removed or in abeyance. We believe the council needs to show more political will and coherent commitment in delivering on its own strategy.	Support noted. We will pass your comments onto out Transport and Highways team.	No change.
Lewisham Cyclists	2	TR 03	Although the plan states (page 457) that developers will be expected to submit details of how their proposals will facilitate walking and cycling to and from their site(s), with a Healthy Streets approach, we consider this too discretionary to have a significant impact. In our experience developers simply focus on cycle parking facilities, rather than investing in improved connectivity to and from the site to other destinations. Therefore the plan should stipulate that adopting the Healthy streets approach will be a condition of planning with all new developments required to demonstrate an improvement in the healthy streets score for adjacent streets to development sites.	Noted. The determination of planning applications must be made in respect of the individual site, whilst having regard to its impact on the local area. It is not considered appropriate to require that development proposals individually improve Healthy Streets scores across a wider area, as depending on the nature and scale of development would be unreasonable to expect. However the Local Plan does make clear the expectations around high quality public realm and design applying the Healthy Streets Approach. Officers consider that this goes well beyond the provision of	No change.

			Our view is the Council should take the lead in stipulating strategic active travel corridors, which the site specific developer would be required to link up with. We are hopeful this will happen with the A21 Healthy Streets Corridor (Lewisham Spine) as envisioned. Unless a strategic cycle and active travel network is specifically pursued by the Council, as previously mentioned in the Council's own Transport Strategy, it is unlikely that developers will single handedly secure that crucial piece of sustainable travel infrastructure. In terms of investment, S106/CIL contributions should be ring fenced for enabling active travel to/from areas of development.	cycle parking facilities, which in any case are required as a minimum by virtue of the London Plan parking standards.	
South East London Labour for a Green New Deal	2	TR 03	The second strand of connectivity is transforming high car traffic roads into healthy streets which are greener and safer for walking and cycling. This should not be just for key borough wide cycling routes and "corridors" which appear to have been prioritised. It needs to be for all streets which have heavy car use and prevent local people feeling safe walking or cycling and encourage active choices. Pavements with cars parked on them and a lack of safe crossings are not conducive to people walking. Streets and pavements made narrow by cars parked on both sides are not conducive to active travel or support the independence of vulnerable or disabled users. The other disincentive to active travel (walking and cycling) is the levels of air pollution caused by motor vehicles.	Noted. The Healthy Streets approach is intended to to be applied to all roads in Lewisham. The Local Plan signposts key corridors along which the Healthy Streets will be promoted in particular, given the number of strategic development sites along these and opportunities for new development to deliver significant public realm improvements.	No change.
South East London Labour for a Green New Deal	2	TR 03	We support the commitment in the Plan to making the layout of places and spaces conducive to active travel and to addressing public health and well being in a more integrated and systematic manner and we support the development of LTNs in consultation with local residents Lewisham must create an environment that encourages and enables people to pursue active and healthy lifestyles irrespective of their age, ability or income, with Healthy Streets/biophilic street principles.	Support noted.	No change.
Transport for London	2	TR 03 Para 12.20	12.20 - We appreciate that the local plan identifies reasons for high levels of inactivity and supports 20 minutes of activity in policy. Adding training to address the reasons why people avoid active travel modes, e.g. cycle training to address lack of confidence/skills will complement these policies.	Noted.	Local Plan amended as suggested.
Transport for London	2	TR 03	In part C, the Council mentions the Healthy Streets Approach being applied to key movement corridors as well as corridors in areas of low PTAL. It would be helpful to identify those corridors so that they can be coordinated with other walking and cycling routes referred to in part D. This will enable developments to include appropriate Healthy Streets improvements as part of the scheme or secured through s106 or s278 agreements. A plan led approach to delivery will enable coordination between development and funding for improvements. Amend part D to read:	Noted. Part C refers to the use of the Healthy Streets Approach in corridors of areas of low PTAL. The key strategic corridors, cycleways and walking routes are set out in Figure 12.4.	Local Plan policy TR3 text amended as suggested.

			‘Opportunities to enhance connections between existing and proposed future routes should be investigated and implemented wherever appropriate and feasible**, including supporting cycle hire expansion along these routes.’**		
	2	TR 03	The previous plans did not take the cross roads into account. The pictures look fine but of course they do not include traffic. If the heavy lorries, delivery vehicles and buses are added, let alone the cars, then a less attractive and chaotic picture will emerge. This cross roads is the only one we know of with no box at the junction and never has had.	Too detailed for the Local Plan but we will pass your comment on to our Transport team.	No change.
	2	TR 04	Policy TR4 comes across as positively hostile to car-free developments and protective of on-street parking, at a time when the council should be trying to actively reduce both on-street and off-street parking if it is genuinely serious about meeting its climate targets. If existing 'car-free' developments are leading to more on-street parking then the obvious solution is to introduce CPZs (which are needed anyway to deal with congestion, air pollution and the blocking of pavements by parked cars). The policy should therefore be linked to a commitment to roll out CPZs across the borough (including the extending the hours of existing CPZs to the entire week). It should also be linked to a commitment to enforcing existing requirements for zero-parking on developments, as these are widely flouted at present. Allowing parking in ostensibly "car-free" developments is worse than allowing developers to provide designated parking spaces on-site, as at least when parking spaces are formally provided they usually have to be paid for, while illegally parking is free.	Noted. The Local Plan is subservient to the London Plan which sets out the future strategy for good growth across the capital. This includes Policy T1 Strategic approach to transport – which states that “Development Plans (such as Lewisham’s Local Plan) should support, and development proposals should facilitate: the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.” This includes stringent policies on car parking, promoting car free development in accessible locations and ‘car lite’ development elsewhere. The Local Plan supports the use of CPZs across the borough to manage parking demand. The Council has recently committed to rolling out CPZs across the borough where they are supported	No change.
	2	TR 04	There is no mention of electric charging points, as we move to electric cars with few houses having front gardens which have car park areas (we would want to stop the paving over of these gardens anyway) the new design needs to include areas where charging points can be put in Each area needs to think about how all these electric cars are going to be charged and the plan needs to incorporate this.	Noted. The policy on electrical charging points are outlined in TR4 Parking. It is recognised that there is a role for electric vehicles for certain trips and in locations less well served by public transport. However, even though electric vehicles reduce tailpipe emissions, they are carbon-intensive to produce and still add to congestion, road danger and severance. Equally, they also generate particulate matter through tyre and brake wear. It should also be noted that the carbon savings from mode shift is immediate, whereas the switch to EVs delays carbon savings until that which is involved with the manufacture of vehicles is ‘paid off’.	No change.
	2	TR 04	New developments should provide a percentage of car parking as things stand, with car chargers for overnight charging. Also, with sufficient handicap bays, and above all DELIVERY BAYS. The Besson St development, for instance, when we saw the plans, had none at all, not even for delivery vans, No parking whatsoever …?.... so how are people expected to get their supplies home? Are they only catering for very young single people? No families, no one with the need for a sofa…a wardrobe? a new boiler? … or kids? Are they really be expecting there to be no room at all in their tiny apartments for any furniture or appliances at all?	Noted. Policies on Parking requirements are set out in TR4 and align with London Plan policies. This includes the need for electrical charging points and disabled parking. The Local Plan and the London Plan has stringent policies on carparking, promoting car free development in accessible locations and ‘car lite’ development elsewhere. This is assessed through the Development Management processes and is supported by Travel Plans and Transport assessments.	No change.

			WE D0 NOT WANT OR NEED MORE RABBIT HUTCH DORMITORIES! People are getting older, so the demographics is pretty clear. More, not fewer people will need deliveries, elderly people to be picked up by families or taxis. Access for vehicles is vital for emergencies as well!	In terms of servicing this is outlined in TR5 Deliveries, servicing and construction. All new development is assessed through the DM process and has to demonstrate how servicing and deliveries will be managed.	
	2	TR 04	SHOPPING PARADES NEED ADEQUATE PARKING TO SURVIVE- Like High Streets too. Parking for more than 20 minutes is vital for any parade. It has to be for up to 2 hours. If you go to the launderette, the surgery, your hairdresser… the dentist… you need more than twenty minutes. The loss of our longer-term parking contributed hugely to Barclays removing their last branch from the New Cross Gate Parade because 'quick' ATM, or cashiers paying in or out, did not generate enough money for the bank. If you were going to the bank for a mortgage, take out an insurance, open an account or to see the manager, you needed more than 20 minutes. Also, there is often a need to carry large and bulky items, washing for the launderette, shopping, be that food or other things. So inadequate parking got rid of our bank branch. I spoke to the manager and he told me it was all down to not getting the right kind of custom that led them to close.	Noted. The Local Plan is subservient to the London Plan which sets out the future strategy for good growth across the capital. This includes Policy T1 Strategic approach to transport – which states that "Development Plans (such as Lewisham's Local Plan) should support, and development proposals should facilitate: the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041." This includes stringent policies on car parking, promoting car free development in accessible locations and 'car lite' development elsewhere.	No change.
Blackheath Society no 2	2	TR 04	**TR4 Parking**. We support the policy aim. We are concerned that PTAL ratings can be misleading, especially if they result from nearby transport facilities that have capacity and congestion problems at peak travel times e.g. Lewisham station, bus routes along major movement corridors/red routes e.g. A21 Lewisham to Catford.	Noted. The London Plan includes stringent policies on car parking, promoting car free development in accessible locations and 'car lite' development elsewhere. Whilst recognising that some key transport interchanges and nodes have capacity issues, the draft Local Plan seeks to ensure that appropriate infrastructure is in place to support the demands generated by new developments.	No change.
Climate Action Lewisham	2	TR 04	However, there is a contradiction and a lack of leadership implied in the explanation to Policy TR4 F which says (p.457 12.24) that car-free and car-capped developments will only be 'acceptable in principle where the development is located within a highly accessible location and within an area where there is an existing Controlled Parking Zone'. In reality, this excludes the majority of the borough as the PTAL map on page 442 shows: huge areas of the borough, including Sydenham, Forest Hill, Crofton Park, Downham, Bellingham, Hither Green and Lee Green and Brockley, as well as the far north of the borough, are all low in public transport access. Controlled Parking zones similarly only apply to 23% of the borough (central Lewisham, Blackheath, Lee Green, Hither Green, Rushey Green, Ladywell and part of Catford). It seems that Lewisham is not as committed as it may wish to seem to providing car-free or car-capped developments if its commitment in terms of car-free development is so strongly conditional. Real leadership would be shown by stronger language and more concrete intentions in a holistic and strategic approach to borough-wide sustainable transport and reducing dependence on the car.	Noted.	Local Plan amended in order that parking policies are in general conformity with London Plan policies on car-free and car-lite development.

Climate Action Lewisham	2	TR 04	Policy TR4K states that 'development proposals for residential and commercial uses will be expected to investigate opportunities to implement rapid electric vehicle charging points, having regard to the Council's Low Emissions Vehicle Charging Strategy'. Climate Action Lewisham does not support the uptake of electric vehicles (EV) as a panacea for the issues surrounding over-reliance on personal transport in urban and suburban areas. The environmental problems caused by widespread use of EVs are almost as negative as for petrol cars, in the energy-and-resource-intensive manufacture of EV batteries, and the problems of their end-of-life disposal. The brake dust generated by EVs contributes to PM2.5 particulates, which are the most dangerous for asthma sufferers, and they do nothing to alleviate congestion, parking pressure or safety. We urge Lewisham council to consider supporting them for essential vehicles only, such as ambulances, disabled transport, public transport and works transport and provide charging points for those vehicles, not for public use.	Noted. It is recognised that there is a role for electric vehicles for certain trips and in locations less well served by public transport. However the Council acknowledges the issues raised by the representation in terms of EV, and a carefully managed approach will need to be taken to reduce car use overall.	Local Plan amended in order that parking policies are in general conformity with London Plan policies on EV and low emission vehicles.
Deptford Society	2	TR 04	**Page 455** TR4 Parking. There is no information about the existing stock of on- and off-street parking, although this is one of the areas where the borough actually has real policy levers at its disposal. How will new developments be required to cater for shared modes (cycle and micromobility hire schemes, increase in ride-hailing etc.). There is also no policy detail about how Lewisham will do this on their roads more generally (geofenced parking areas for hire schemes, more drop-off bays and less parking, ultra-short-stay parking etc.).	The Local Plan is a strategic policy document which is underpinned by more detailed strategies such as the cycling strategy, transport strategy and Local Implementation Plan. These documents can be found on the Councils website. When determining planning applications, these will be assessed having regard to a Transport Assessment which will consider parking provision in further detail, both existing and proposed.	Local Plan amended in order that parking policies are in general conformity with London Plan parking policies.
Greater London Authority	2	TR 04 Para 12.22-12.26	12.22 - Assessing parking standards based on whether stations are step free is not the approach set out in the London Plan. As such, we seek clarification as to whether or not this is a consideration limited to areas outside of PTAL 4-6. Providing car parking near stations, even when the stations are not step free, risks creating an environment that is dominated by cars, which is cited as a key barrier to travel by disabled people. It is also contrary to the MTS, which suggests that the public realms around stations should be for active travel and public transport, rather than for cars. This is especially important as transport hubs should always prioritise access by sustainable means and car parking introduces barriers and car dominance which undermines other modes for all people, including those with disabilities. 12.24 - The wording and tone relating to car-free or 'car-lite' development should be more positive. It should also be noted that car-free developments in the London Plan do, in fact, include parking for disabled people. Therefore, we suggest the last statement in this section be deleted: ~~**'In addition, there**~~	Noted	Local Plan amended in order that parking policies are in general conformity with London Plan policies on car-free and car-lite development, and to reflect the changes as suggested.

			~~**may be some circumstances where car-free development is not acceptable, for instance, to ensure the needs of Blue Badge holders are suitably accommodated'.**~~ The statement 'car-free or car-capped development will only be acceptable in principle where the development is located within a highly accessible location and within an area where there is an existing Controlled Parking Zone' does not comply with the London Plan Policy T6C, which states: 'An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets'. Also, Tables 10.3, 10.4, 10.5 in the London Plan clearly identify where car-free or car-lite development is required. 12.26 - We recognise there is a role for car clubs and electric vehicles for certain trips and in locations less well served by public transport. However, even though electric vehicles reduce tailpipe emissions, they are carbon-intensive to produce and still add to congestion, road danger and severance. Equally, they also generate particulate matter through tyre and brake wear. Therefore, in line with other comments, we would strongly recommend that Council's commitment to reducing car use is reflected more strongly in these policies. It should also be noted that the carbon savings from mode shift is immediate, whereas the switch to EVs delays carbon savings until that which is involved with the manufacture of vehicles is 'paid off'.		
Lee Manor Society	2	TR 04	One issue to be addressed is **pavement parking**. If this is to be allowed space clearly needs to be reserved and protected for future tree planting. Ideally we would like to see pavement parking prohibited. It makes pavements almost unusable for pedestrians, particularly the elderly, the disabled, the visually impaired, the blind and parents pushing buggies: it encourages walking in the road – surely not an ideal outcome.	Noted. In line with London Plan and Local Plan policies that enable walking and cycling and encourage tree planting, we recognise that pavement parking in the borough should be reviewed. Our intention is to remove pavement parking where possible with the roll out of new controlled parking zones (CPZs) and the review of existing CPZs. The Council has recently committed to rolling out CPZs across the borough where they are supported	No change.
Lewisham Cyclists	2	TR 04	Car parking, legal pavement parking should be banned for all new development, with controlled parking zones for existing residents implemented as conditions of any planning agreements.	Noted. In line with London Plan and Local Plan policies that enable walking and cycling and encourage tree planting, we recognise that pavement parking in the borough should be reviewed. Our intention is to remove pavement parking where possible with the roll out of new controlled parking zones (CPZs) and the review of existing CPZs. The Council has recently committed to rolling out CPZs across the borough where they are supported	No change.
Lewisham Liberal Democrats	2	TR 04	7. The consequences of providing minimal car parking space need to be thought through. Although it is important to encourage people to walk and cycle, the council has to be aware that there are many people who are not entitled to hold blue badges who nevertheless cannot carry shopping large distances. If	Noted. The London Plan includes stringent policies on car parking, promoting car free development in accessible locations and 'car lite' development elsewhere. Car free development still includes provision for blue badge parking. The Local Plan must be in general conformity with the London Plan. Overall, the spatial strategy for the Borough	No change.

			people continue to organise home deliveries, then large supermarkets will become redundant. However, many would like to shop in a large retail unit if the council or some other organisation were to provide home delivery by electric vehicle, or other less polluting solution. Older and frail customers could shop and arrange for their purchases to be taken home. Some such arrangement will need to be in place if Leegate and the Sainsbury's site, and Catford town centre, are to thrive. It should also be borne in mind that once Covid is over, even the young and fit will not have enough time to walk or cycle everywhere, when their children's busy social lives resume. Cars cannot be simply wished away.	seeks to ensure that people in Lewisham can easily access jobs, services and community facilities, and leisure and recreation opportunities.	
Lewisham Pedestrians	2	TR 04	**Principles for determining planning applications – the Local Plan** • Applications for crossovers and planning applications that include any crossovers must demonstrate the use of both contrasting colour and texture surfaces to indicate a hazard. This will encourage people to walk by reducing the risks arising from the introduced hazard of collision with moving vehicles. This especially applies to children, people with vision impairment and people relying on guide/assistance dogs. • Applications that include kerbed vehicle access across the footway must demonstrate that absolute pedestrian priority is clearly indicated. • Place all residential parking (except disabled parking for residents and visitors) to the edges of housing developments so that if private vehicle ownership declines then that space can be re-purposed as green space. • Residents of new single and multiple dwellings should not be allowed Lewisham residential on-street parking permits. This condition would apply to all future residents and would also exclude those residents from participating in controlled parking zone consultations. • Each off-street motor vehicle parking space must have electric-vehicle charging functionality – this should apply to all applications that include any motor vehicle storage space. We note that the current draft of the Local Plan shows a very disappointing 20% requirement only.	Noted. The parking policies have been updated to align with the London Plan standards, including reference to the London Cycle Design Standards and additional signposting of streetscape guidance documents. These policies, in combination with policies on public realm, are considered to provide a sufficient strategic approach.	Local Plan Parking policies reviewed and updated. Additional signposting of streetscape guidance document.

			• Applications for electric charging facilities on the private realm that has any public pedestrian access must demonstrate that no trip hazards are introduced.		
Make Lee Green	2	TR 04	**Action on Parking** Part of the solution to uncontrolled car use should be to gradually restrict parking. London has two parking spaces for every car and not enough homes for every person. Our priorities need to change. - Car-free residential developments should be the norm rather than the exception. - Residents' car-parking charges should reflect the full cost of the pollution and environmental damage caused by specific vehicle types - Residents should be able to install secure bicycle and mobility scooter parking anywhere that privately owned cars can be parked	Noted. The Local Plan and the London Plan has stringent policies on car parking, promoting car free development in accessible locations and 'car lite' development elsewhere. This is assessed through the Development Management processes and is supported by Travel Plans and Transport assessments. These measures along with others within the draft Local Plan are and will continue to reduce car borne traffic generated by new development. The Local Plan supports the use of CPZs across the borough to manage parking demand. Please see TR4 Parking. The Council has recently committed to rolling out CPZs across the borough where they are supported Car parking charges are outside the scope of the Local Plan.	Local Plan amended in order that parking policies are in general conformity with London Plan policies on car-free and car-lite development.
South East London Labour for a Green New Deal	2	TR 04	The local plan also comes across as weak when it comes to car-free development and reduction in the number of car parking spaces, in particular on-street. A more ambitious strategy of car parking reduction, integrated with LTNs, healthy streets and corridors, and public transport, should be developed for the borough. This is in line with international best practice, using major redevelopment to support active travel and public transport and reducing and consolidating car parking provision (except for disabled parking as per London Plan policies).	Noted. The London Plan has stringent policies on car parking, promoting car free development in accessible locations and 'car lite' development elsewhere. It is acknowledged that amendments to the Local Plan parking policies are required to bring them in line with the London Plan.	Local Plan amended in order that parking policies are in general conformity with London Plan policies on car-free and car-lite development.
Telegraph Hill Society	2	TR 04	The proposal for the Sainsbury's/Mount Anvil development at New Cross Gate generated considerable opposition from residents because of the lack of parking in the development. The creation of Controlled Parking Zones (CPZs) in the local area as a solution to this was felt to be an unacceptable burden to existing residents. It was felt totally unfair that a new development should impose a burden both in cost and inconvenience on existing residents, by taking away, without compensation, their rights to free street parking. The first sentence of policy **TR4.F** therefore gives us considerable concern as it appears not to take into account the impact of such a development on existing residents. Developers should pay for the disadvantages that their development creates for existing residents and this should be made clear in the policy.	The London Plan includes stringent policies on car parking, promoting car free development in accessible locations and 'car lite' development elsewhere. Car free development still includes provision for blue badge parking. The Local Plan must be in general conformity with the London Plan. The Local Plan supports the use of CPZs across the borough to manage parking demand. Please see TR4 Parking. The Council has recently committed to rolling out CPZs across the borough where they are supported	No change.
Telegraph Hill Society	2	TR 04	The first sentence of **TR4.F** should be deleted and the remainder of that policy applied to all developments. If it is to remain, despite our concerns, it should be reworded to say *"Development proposals for car-free development will only be supported where they are located in highly accessible locations and locations well-connected by public transport with suitable capacity to service the demand from the development and it*	Noted	Local Plan amended in order that parking policies are in general conformity with London Plan

			can be demonstrated will have no significant impact on the existing provision of on-street parking" with **§ 12.24** modified appropriately.		policies on car-free and car-lite development.
Telegraph Hill Society	2	TR 04	The statement in **§ 12.24** "Consideration will be given to proposals where it can be demonstrated that a new CPZ will be in place by the time of the occupation of development." should be deleted. It provides a huge incentive for developers to seek to force through CPZs potentially in the face of opposition from residents.	The Local Plan supports the use of CPZs across the borough to manage parking demand. Please see TR4 Parking. The Council has recently committed to rolling out CPZs across the borough where they are supported	No change.
Telegraph Hill Society	2	TR 04	Policy **TR4.G** on CPZs and/or the associated text should include a provision that CPZs will not be introduced without an appropriate and fairly conducted survey of residents' views. It should be noted that on at least two previous consultations about proposed introductions of a CPZ in the Telegraph Hill Conservation Area the overwhelming majority of residents who responded opposed such schemes.	The Local Plan supports the use of CPZs across the borough to manage parking demand. Please see TR4 Parking. The making of CPZs are outside the scope of the Local Plan.	No change.
Telegraph Hill Society	2	TR 04	Policy **TR4.H** relating to Permit Free developments needs to include a proviso that such consideration will take into account the potential impact on existing local provision of on-street parking as it is likely to cause over-flow parking issues.	The London Plan includes stringent policies on car parking, promoting car free development in accessible locations and 'car lite' development elsewhere. Car free development still includes provision for blue badge parking. The Local Plan must be in general conformity with the London Plan. The Local Plan supports the use of CPZs across the borough to manage parking demand. Please see TR4 Parking. The Council has recently committed to rolling out CPZs across the borough where they are supported	No change.
Telegraph Hill Society	2	TR 04	A number of retail studies suggest that on-line and home-shopping will increase dramatically and, post COVID-19 substantially faster than taken into the London Plan. To suggest, as **TR5.A** does, that cargo-bikes will be able to manage this growth is somewhat naive. The idea that Sainsbury's, Tesco or even the local electrical store will deliver by bicycle is not realistic. Even where the local store delivers by bicycle it is unlikely that their wholesalers would be able to deliver to them other than by motor vehicle.	Noted. The intention is for the policy to promote the use of cargo bikes whilst recognising a wide range of vehicles will be needed to support deliveries, servicing and construction.	Policy TR5.A amended to provide that a wide range of modes will support deliveries, servicing and construction.
Telegraph Hill Society	2	TR 04	Whilst **TR5** takes this into account there is nothing in this policy which facilitates or encourages the use of electric vehicles by shops and delivery firms rather than petrol/diesel. The policy should address this issue which is mentioned in the Explanation for **TR4 (§ 12.26)** but not currently included in the policy **TR5**.	Noted. Noted. It is recognised that there is a role for electric vehicles for certain trips and in locations less well served by public transport. However, even though electric vehicles reduce tailpipe emissions, they are carbon-intensive to produce and still add to congestion, road danger and severance. Equally, they also generate particulate matter through tyre and brake wear. A carefully managed approach to EV provision is necessary and where new infrastructure is required to support this, consideration will need to be given to the site context and local character.	Local Plan amended to align with London Plan policies on electric and low emission vehicles.
The St John's Society	2	TR 04	There is a current conflict between the demand for Electric Vehicle charging points and the resistance to installing these in Conservation Areas from the borough. They are integral to the move away from petrol (not gas) fuelled vehicles.	Noted. It is recognised that there is a role for electric vehicles for certain trips and in locations less well served by public transport. However, even though electric vehicles reduce tailpipe emissions, they are carbon-intensive to	Local Plan amended to align with London Plan

				produce and still add to congestion, road danger and severance. Equally, they also generate particulate matter through tyre and brake wear. A carefully managed approach to EV provision is necessary and where new infrastructure is required to support this, consideration will need to be given to the site context and local character.	policies on electric and low emission vehicles.
Transport for London	2	TR 04	As mentioned earlier, we support that the local plan parking policy that 'development proposals will be assessed against, and should not exceed the parking requirements and standards set out in **draft** London Plan'. We do not, however, support a predict and provide approach to car parking that is laid out in parts of TR4F. We consider this to fundamentally undermine the restrictive approach set out in the London Plan and argued successfully at examination. To deliver the MTS and London Plan, we need each local authority in London to move away from predict and provide and towards an approach based on a shared vision and outcomes that will make London a healthier, more liveable city. Any deviation from the London Plan approach must be supported by evidence of need, and crucially, demand does not equate to need (e.g. there is demand for car parking in central London but that does not mean increased supply would be a robust policy approach). The adverse impacts of any deviation need to be addressed in any evidence produced, including, but not limited to the impacts on: congestion, road safety, the reliability of buses, air quality, noise, health and social inequalities and the ability to walk and cycle in attractive environments. For the local plan policies to align with the Borough's vision of reduced car use and sustainable travel, we suggest the following changes to strengthen the parking policy. A & B - We strongly encourage car-free and car-lite development, prioritising active travel and potential public transport improvements over car parking, even in areas of lower PTAL where innovative solutions might exist to enable car-free living (e.g. car clubs, pooled cargo cycles, taxis or PHVs and online shopping for bulkier items). C - This paragraph only mentions PTAL, but it should also include other geographical designations, such as town centres and Opportunity Areas. Existing and future active travel potential should be considered alongside public transport connectivity when determining parking provision, especially given that many trips in London are local and so can be done by walking or cycling, with longer trips being less frequent and possibly done by bus, rail or occasional shared car use. This aligns with aims set out in the MTS as well as the Lewisham Cycle Strategy. Step free access at rail stations is a different, but also important objective .	Noted.	Local Plan amended in order that parking policies are in general conformity with London Plan policies on car-free and car-lite development, and to reflect the changes as suggested.

			D - We commend establishing a parking hierarchy that distinguishes between potentially more genuine need and simply choice. However, in the London Plan, both disabled persons car parking and cycle parking are required, and as such, are equally important. Whilst car clubs can be useful in supporting a car-free lifestyle, they can also result in people switching from more sustainable modes, and for this reason we would urge care in their promotion when compared to active travel and public transport. The best way to implement them is with an attendant reduction in the overall volume of parking spaces in an area because it is likely that a car club car is more intensively used than a privately owned one, and simply adding car clubs into the mix without reducing parking for privately owned parking will risk increasing car travel and dominance. In new developments, car clubs should be deployed where they can provide for occasional car use for households that are prevented from owning their own car. As such, they are best deployed where parking levels are very low. It should be noted that car club bays, as well as Blue Badge parking count towards the maximum car parking quantum set out in the London Plan (10.6.4). We strongly advise clarifying that c, d, e and f need not be part of all developments, which is included in supporting text but requires strengthening. London-wide evidence (LTDS) shows a correlation between income and car ownership, rather than the presence of children in the home and car ownership. This is why the London Plan has departed from the previous approach as it was shown to be not evidence-based. As such, 'family dwelling parking' in (D)(d) should be removed. Any vehicle parking beyond disabled persons parking (a) and car clubs (c) should be allocated on short-term leases as set out in the London Plan (Policy 10.6.14). This is to enable flexibility which is required as circumstances change. Equally, disabled persons parking should not be allocated to a dwelling, but instead cater for parking for a variety of Blue Badge holders, or allocated to a specific person. This is required so that turnover of residents does not lead to a disabled persons parking space being allocated to a household with no Blue Badge holders. F - Car-free development should be the starting point for discussions at all development, as set out in Policy T6B. The wording of this section can be modified to create a more positive parking policy that will help focus on how to plan to create conditions conducive to car-free living rather than being limited by status quo and existing poor conditions. Use of 'highly accessible' in the leading statement may be understood as supporting car-free developments in areas that are accessible for disabled people. Use of 'well-connected' is preferred for clarity. We recommend that the leading statement and subsequent sub items be modified as follows:		

			‘Development proposals for car-free development will be supported where they are located in **highly accessible and** well-connected locations. Elsewhere, car-free developments will ~~**only**~~ be supported where it can be suitably demonstrated that: a. The development is appropriately located at a well-connected **and** ~~**accessible**~~ location **with good walking and cycling access to local services/amenities**; b. **The development is in an Opportunity Area or town centre, or in an area with plans for significant growth or change that will bring about attractive conditions for walking, cycling and access to local services;** ~~b. The development is located within an existing Controlled Parking Zone (CPZ). or it can be demonstrated that there is no capacity on the existing local road network to accommodate the parking demand generated by the development.~~ c. There is sufficient capacity on the public transport network **or potential for active travel interventions or implementation of LTNs** in the locality to **sustainably** cater to the additional demand arising from the development, taking into account existing and planned transport infrastructure; and d. There **is an existing Controlled Parking Zone (CPZ) or a future CPZ can be established through planning contributions**. ~~**will be no adverse impact on existing provision of on-street parking’**~~; We agree with the Council that the status-quo needs to be addressed with positive planning and innovative policies. With ULEX, CPZs will be more important than ever to protect resident amenity and mitigate impacts of growth by minimising any additional vehicular traffic. Provision of off-street parking to address on-street parking stress does not address the challenges faced by existing residents (finding parking or dealing with congestion), nor does it address the potential for competition for town centre or other destination parking. To truly mitigate the impacts of development, new residents should not be enabled to travel by car. Policy T6C of the London Plan clearly states that the lack of a CPZ should not be a hindrance to development and it does not preclude developments from complying with parking standards. The proposal to permit parking on-site where on-street parking exists fundamentally undermines this approach and could contribute to making poor use of land and/or reducing the provision of affordable housing and other infrastructure due to the cost of digging costly basements. Therefore, the solution to parking stress is to manage demand through the introduction of CPZs and capping permits so residents of new development are unable to obtain them. CPZs can be paid for by developers through planning obligations and		

			can improve amenity for existing residents (whether they own a car or not), as well reserve spaces on local streets for residents only. Part H should make it mandatory that any new development that is required to be car-free should also be permit-free. Part I should include passive provision for all remaining spaces for residential development, not just 40 per cent, in line with the London Plan policy T6.1(C). Different requirements apply for parking associated with other use classes, so it would be easier to refer to the London Plan. J - The London Plan requires all developments (not just major developments) with parking to submit a Parking Design and Management Plan (PDMP) so that consideration can be given to: the provision of electric vehicle charging points, how Blue Badge spaces will be provided upon request, or how space might be converted in future as needs change. Part (J) says that cycle parking provision should be considered by PDMPs. The detail of proposed cycle parking provision should be included in the planning application, including number of spaces for short stay, long stay, adapted cycles, etc., with the PDMP covering issues of management and design of such areas.		
Blackheath Society no 2	2	TR 05	**TR5 Deliveries, construction and servicing**. We support the policy aim. We have concerns about the impact of additional traffic generated by new developments, especially 'car free' ones, on major movement corridors and local amenity (e.g. in Lewisham town centre, which remains congested at peak times despite major expensive road remodelling).	Support noted. The London Plan has stringent policies on car parking, promoting car free development in accessible locations and 'car lite' development elsewhere. The overall approach advocated is to reduce car use. Development proposals will need to be accompanied by Transport Assessments to consider impacts on the highway network.	No change.
Climate Action Lewisham	2	TR 05	With a view to encouraging active travel and a small-business-based local economy, supporting last-mile delivery hubs (p460; 12.30) is an excellent idea, which will help congestion on suburban roads and encourage engagement with local businesses.	Support noted.	No change.
Deptford Society	2	TR 05	**Page 459** TR5 Deliveries, servicing & construction. The policy relating to requirements for new developments could be strengthened, for example capping delivery numbers to force micro-consolidation, allowing access for only for low emission vehicles etc. There is also nothing about identifying/protecting small sites for the micro-consolidation centres – the north of the borough should be a target area for these facilities.	Noted. It is not considered appropriate or feasible to cap delivery numbers. However, development proposals will be required to include Transport Assessments, along with Delivery, Servicing and Construction Management plans, where appropriate. This will help the Council to consider impacts of development and secure measures to appropriately manage the use, for example, by planning conditions.	Local Plan policy TR5 amended to include additional point on shared micro storage and distribution facilities.
Lewisham Cyclists	2	TR 05	On page 460 - last mile delivery we support this although we'd like to see the Council supporting e-cargo bike delivery companies as well as encouraging mutual storage and warehousing facilities at strategic points such as to provide delivery hubs for both Lewisham and Catford Town Centres.	Noted.	Local Plan policy TR5 amended to include additional point on shared micro storage and

					distribution facilities. Local Plan amended to clarify support for cargo bikes as part of cycling provision.
Port of London Authority	2	TR 05	**10. Policy TR5: Deliveries, servicing and construction.** In principle support the policy, which states that development proposals should facilitate sustainable freight, where possible, through water, rail, road and over the last mile. As part of the supporting text it is considered that the policy must give reference to the potential use of existing and proposed piers and structures as part of the delivery of small scale freight ('last mile' delivery). This would help to align with the recent Mayors Transport Strategy (2018) which, under policy 17 states that the Mayor will seek the use of the full potential of the Thames to enable the transfer of freight from road to river in the interests of reducing traffic levels and the creation of Healthy Streets as well as associated London Plan policies. Given the scale of the proposed future development in the borough, the use of alternative and innovative delivery and servicing practices that utilise the boroughs waterways must be referenced and promoted as part of this policy.	Noted.	Local Plan TR5 policy supporting text amended as suggested.
Blackheath Society no 2	2	TR 06	**TR6 Taxis and private hire vehicles**. Moves to reduce private car use are likely to drive increased use of taxis and private hire vehicles, as well as of public transport. In this context, the policy looks sensible. We are surprised that the Plan makes only two references to car clubs, which are increasingly popular.	Noted.	No change.
Blackheath Society no 2	2	TR 07	**TR7 Digital and communication infrastructure and connectivity**. We support the aim of the policy, which looks sensible.	Support noted.	No change.
London Wildlife Trust	2	TR 07	We support this policy in principle. However, in Part D and supporting para 12.45, we recommend ecological impacts are referenced too. Our experience is that open green spaces are likely to be chosen as sites for masts, and that policies GR1 and GR3 need to apply here.	Support noted.	Policy amended to include a new criterion on open space and biodiversity, as suggested.
Telegraph Hill Society	2	TR 07	Having objected to a significant number of applications in the past for telecommunication masts in the Telegraph Hill Conservation Area which have been either inappropriately designed or inappropriately sited, or both, we welcome policy **TR7.D.f**.	Support noted.	No change.
Telegraph Hill Society	2	TR 07	The Explanation of the policy in **§ 12.40** states that the Borough is currently very limited in its full-fibre broadband connectively and that the Council will work to improve this. However, this is not reflected in the policy itself. The policy needs to be modified to do so.	Noted.	Policy TR7.A amended to make clearer the need for digital

					infrastructure to address gaps/barriers.

Lewisham Local Plan

Regulation 18 consultation statement

Appendix 2 – Regulation 18 Draft Local Plan Written Responses Split Part 3

September 2022

Organisation (if relevant)	Part	Section, policy or paragraph	Comment	Council officer response	Action
Blackheath Society no 2	3		Many site allocations already approved/underway, but no summary to show this	Noted. Site allocations with planning consents are noted in the plan. The Local Plan will be updated to provide further information on the status of site allocations and timescales for delivery.	Local Plan amended to provide updated indicative timeframe fro the delivery of site allocations Local Plan amended to include an up-to-date Housing Trajectory and five year housing land supply.
Blackheath Society no 2	3		**General** Concern: how to deal with issues on/near the boundary between areas, whether these Plan areas, or wards, or CAs, or boroughs e.g. Greenwich for Blackheath	The Local Plan must be read as a whole.	No change.
South East London Labour for a Green New Deal	3		Despite the presence of significant areas of out-of-town retail and industrial estates in the south of the borough, often close to railway stations, not all of these seem to be targeted for high density site allocations as per London Plan co-location policies. This lack of balance in site allocations is cause of significant concerns.	The Local Plan does allocate the existing out-of-town retail parks for mixed-use, high-density redevelopment. It also identifies a number of industrial areas which could be intensified or suitable for co-location. However, the plan is also concerned with protecting and growing local jobs. Our employment land review recognised that lots of our employment areas are well occupied and demand for floorspace is considerable. In order to ensure we protect and enhance jobs within the borough areas of Industrial land are protected by the Local Plan and in the case of Strategic Industrial Land (SIL) by the London Plan.	No change.
Telegraph Hill Society	3		We have previously pointed out that the character area and neighbourhood shown for Telegraph Hill in **figure 13.1** is incorrect. The Telegraph Hill Conservation Area, and the former Haberdashers' Estate of which it forms part, stretches to the A2 and New Cross Gate Station. It does not stop half-way down Jerningham Road nor exclude Musgrove, Troutbeck and the northern end of Pepys Road as the figure purports to show. We appreciate that the outlines on the map are not meant to be more than indicative but there is a considerable danger that that they might be used to justify inappropriate development. Where any such figures are clearly incorrect, as they are in this case, they must be amended.	The character areas and neighbourhoods within the Local Plan were defined by the Characterisation Study in 2019. As part of this process a collaborative exercise involving a number of community groups across the borough discussed and ultimately agreed these broad boundaries. Whilst we appreciate that not everyone may agree on the exact boundaries this was consensus lead and also derived by peoples understanding of the character and geographical boundaries of places.	No change
Telegraph Hill Society	3		Furthermore **figure 13.1** fundamentally mis-represents the catchment area of New Cross Gate. As we note below, most of the residents of Telegraph Hill up to the Vesta Road/Kitto Road line look principally towards New Cross Gate and the A2 for their transport needs; whilst south of that line there is a greater use of Brockley or Nunhead. For shopping the whole of area generally looks towards New Cross Gate for supermarkets and to Nunhead for small specialist shops rather than to Brockley.	The character areas and neighbourhoods within the Local Plan were defined by the Characterisation Study in 2019. As part of this process a collaborative exercise involving a number of community groups across the borough discussed and ultimately agreed these broad boundaries. Whilst we appreciate that not everyone may agree on the exact boundaries this was consensus lead and also derived by peoples understanding of the character and geographical boundaries of places.	No change.
Telegraph Hill Society	3		We have objected before, and continue to object to, the split of the Borough in the way it is set out in this Part of the Plan. The Area map (**figure 13.2**) splits the Telegraph Hill Conservation Area into two parts. The majority of Telegraph Hill is included in the West Area and is therefore separated from Hatcham Park and the part of the Telegraph Hill Conservation area between Pepys Road and Jerningham Road in the North Area.	The character areas and neighbourhoods within the Local Plan were defined by the Characterisation Study in 2019. As part of this process a collaborative exercise involving a number of community groups across the borough discussed and ultimately agreed these broad boundaries. Whilst we appreciate that not everyone may agree on the exact boundaries this was consensus lead and also derived by peoples	No change

				understanding of the character and geographical boundaries of places.	
Telegraph Hill Society	3		We imagine this is to scope part of the Conservation Area into the North Area for the purposes of considering the effect on proposals relating to the New Cross Road on the area and, if this is the case, then this is a welcome improvement over the previous split which ran along the New Cross Road.	Noted	No change
Telegraph Hill Society	3		A much larger part of the Telegraph Hill Conservation Area is however affected by what happens on the A2 New Cross Road and in New Cross and New Cross Gate than implied on these maps. It looks to New Cross and New Cross Gate as its local shopping centre and not to Brockley. The New Cross Gate railway station is the major station for the majority of Telegraph Hill residents (a minority using Brockley or Nunhead) and developments which impact on the capacity of that station to service the area impact significantly on these local residents.	We acknowledge that the northern section of the western sub area is impacted by the A2 New Cross Road.	No change.
Telegraph Hill Society	3		Hatcham Park and Telegraph Hill on either side of the A2 were developed together by the Haberdashers' Livery Company, with a homogeneity of design that resulted in them both becoming Conservation Areas in 1990. Even the map on page 470 shows Telegraph Hill as overlapping more with the lower part of New Cross than with Brockley. It makes no sense therefore to have the split where this Plan places it.	The character areas and neighbourhoods within the Local Plan were defined by the Characterisation Study in 2019. As part of this process a collaborative exercise involving a number of community groups across the borough discussed and ultimately agreed these broad boundaries. Whilst we appreciate that not everyone may agree on the exact boundaries this was consensus lead and also derived by peoples understanding of the character and geographical boundaries of places.	No change
Telegraph Hill Society	3		Two further and specifically example of these issues: • The Besson Street triangle is in the North Area, but the changes to the traffic flows around that area with the recent remodelling of traffic flows in Besson Street and New Cross Gate have had a considerable impact on the residents of the west side of the Telegraph Hill Conservation Area • The Goldsmiths A2/A21 gyratory system is in the North Area, but changes to the traffic flows in that area, including recent temporary changes whilst gas works were carried out, have increased the traffic across the east side of the Telegraph Hill Conservation Area.	The sub area boundaries do not have a significant bearing on the assessment of individual applications and any impacts of development whether traffic or otherwise will be assessed against the policies within Part 2 of the plan. We acknowledge that not everyone may agree on the exact boundaries of the sub areas however this will not impact on the robustness of our assessment at planning application stage.	No change.
Telegraph Hill Society	3		We accept that Telegraph Hill does not have much in common with the "true" more -industrial northern parts of the Borough or with Deptford. However, in terms of site typography and the built environment, Hatcham Park also has more in common with Telegraph Hill than with North Deptford. We would propose therefore that the Hatcham Park area should be included in the West Area so that New Cross Gate, Hatcham Park and Telegraph Hill can be considered holistically.	Disagree	No change.
Telegraph Hill Society	3		There is little in these sections about the Conservation Areas, and it is noticeable that the West Area section of this Plan does not mention Telegraph Hill or the Telegraph Hill Conservation Area at all.	Noted. The draft Local Plan Part 2 on Heritage provides further details on the historic environment including Conservation Areas. The plan must be read as a whole.	No change.
TIDE CONSTRUCTION LTD	3	General LCA SA 09	Dear Sir/Madam, REPRESENTATIONS TO THE LEWISHAM LOCAL PLAN REGULATION 18 MAIN ISSUES ANDPREFERRED APPROACHES DOCUMENT, ON BEHALF OF TIDE CONSTRUCTION LTD. On behalf of our client, Tide	Noted. Responses to further detailed representations set out elsewhere in this Consultation Statement.	No change.

			Construction Ltd., we are pleased to submit representations to the current consultation on the Lewisham Local Plan Regulation 18 stage “Main Issues and Preferred Approaches” document. Tide Construction is a development and construction company which designs, builds and delivers purpose-built student accommodation across London. Tide secured planning permission for 67affordable dwellings and 758 student flats with commercial uses on the former Carpetright Site at Loampit Vale, Lewisham, in October 2019 (LPA ref. DC/19/110610).		
TIDE CONSTRUCTION LTD	3	General LCA SA 09	SUMMARY We trust our representations on behalf of Tide Construction Ltd. will be taken into consideration in the preparation of the next stage of the Lewisham Local Plan. If you have any questions about the content of this representation please do not hesitate to contact us	Noted. Responses to further detailed representations set out elsewhere in this Consultation Statement.	No change.
The St John’s Society	3	General	Many site allocations already approved/underway before key transport improvements have been built.	Noted. Decisions on previous planning applications are outside the scope of the Local Plan.	No change.
	3	LCA	My husband and I have lived in Catford for just over 20 years. Our friends are local to the area, and we have even persuaded a few of them to move over from North and East London. We eat and shop locally, and would love to stay. Right now, some of the proposals in the Local Plan document have us considering that perhaps our future doesn't lie here after all. I'd love to be proved long and that local planners really do take into consideration the well being of people and future-proofing the character of the area.	Noted. The Local Plan sets out the strategic framework to support the comprehensive regeneration and revitalisation of Catford town centre. More generally, the Local Plan seeks to improve the character, quality and liveability of neighbourhoods within the borough.	No change.
	3	LCA	I’d like to comment on the Local Plan’s content and presentation, and my concerns over the current suggestions for the centre of Catford. I think Catford can go two ways: Follow the example of Lewisham which has created dense high rise small flats with no sense of community and no apparent easing of the local housing shortage Or take the opportunity to create an interesting town centre with a defined agreed and monitored social housing targets and which respects the local architecture particularly the low rise surrounding Victorian and Edwardian houses.. I am so hoping that you start to take the second option. In detail: **Existing residents** The web site shows an overview after consultations with local residents. However there appears to be a disconnect with the draft Plan which frankly is no better than a Lego land of buildings – with an almost complete disregards for what had been told you alas. This is a real chance to take on interesting building and learn from the French intensive housing set back from streets rising to a maximum of eight	The Local Plan recognises the important role of Catford major centre in the town centre hierarchy. It sets out the strategic framework to support its comprehensive regeneration and revitalisation. Further details are set out in the Catford Town Centre Framework, which the Council has prepared to help support implementation of the Local Plan. The public consultation has been carried out in accordance with the Council’s adopted Statement of Community Involvement. For the Catford area, there have been additional opportunities and engagement, such as through the Catford Conversation and the Catford Town Centre Framework. Catford is located within a London Plan Opportunity Area – these are areas throughout London and Lewisham which have the potential to accommodate growth and regeneration; this includes for more homes but also commercial space, community facilities and public open space. The Part 2 policies of the Local Plan set out further details on housing design standards and housing mix to meet local needs, including for family homes. The Local Plan makes clear that Catford town centre has a distinctive character and identify, along with a unique role in the town centre hierarchy as the	No change.

			storeys. This is of importance to the context as Catford lies in a low valley. Without visible benefits there is no way to carry local opinion which you will know from the heated opposition to the Catford Green proposed 19th storey remains strong – and I for one would strongly support this. **Why such small flats now? And in such numbers?** We know that the traffic plans for Lewisham were acknowledged to be out of date once set in tarmac – this plan needs to be more adaptable and clearly set out in phases to encourage lessons learnt again something that has been recognised from the Lewisham experiment. Forty years!! There is a clear argument for family sized houses or apartments if we are to make Catford a destination and not a transient camp. Also giving London is losing residents – either back to Europe for example or the moves to the country, the latest count being upwards of 700,000. Where is the commitment to reducing) Lewisham's local housing shortage? And all of Lewisham's planning for years has emphasised the need for family house, and for houses not to be divided up. How is Catford going to compete with Lewisham and Bromley on retail? No one can deny that Catford Centre looks miserable – and made worse recently by the permanent closure of such stays of a high street as Boots With Tesco, Lidl, Aldi, B&M, Dunelm, Wickes, Halfords and other large shops all under threat this is a concern. All are well used locally and given the relative poverty of many Catford residents small trips to budget or very reasonable shops is a higher priority than small, albeit interesting boutiques.. **The programme is how long?** I have been the programme manager for major national programme for seven years – and that was difficult to deliver. This simply is too much in the future and will result in planning blight where no one invest or start a business up here. **Those tall towers of Lewisham** What happened? Why was the housing shortage not addressed? Because LBL sold off plan aboard for starters and it was all driven by developers. Without a change of approach I can see no comforts for Catford monitoring.	Borough's main civic and commercial hub. Whilst it will continue to serve an important commercial and service role, the plan seeks to ensure its long-term vitality and viability by allowing for a wider mix of uses. The Local Plan seeks to ensure Catford complements and does not compete with other centres like Lewisham and Bromley. The London Plan is clear that tall buildings will have a role in helping to meet London's housing needs. The Local Plan Part design policies set parameters for building heights. The Local Plan must cover a minimum 15 year period, in line with national planning policy. Part 2 of the Local Plan on Green infrastructure sets out approaches to protect and enhance green spaces, including by addressing identified areas of deficiency. Part 4 of the Local Plan sets out a monitoring framework, which includes Local Performance Indicators – these are metrics against which performance in delivery will be reviewed.	

			CSF Critical Success Factors – where are they? Green spaces - we all want to enjoy but this is a very limited vision – before we've even started" Pleased plan in decent green spaces. This is our chance. You border on Catford South which is one of the most deprived areas in London for public green space.		
	3	LCA	Local plan improvements needed SE6 4UR: Please improve the following on Ravensbourne Road / Sunnyside, Blythe Hill / the parade of shops on Stanstead road on which The Blythe Tavern / Post Office / Moon Lane Books are part of. - more trees on Ravensbourne Road / Sunnyside and the local parade - traffic calming measures / ban lorries with height and or weight restrictions on the rat run from Catford Bridge Station via Montacute road, Polstesd Road, Ravensbourne Park Crescent and Ravensbourne Park to stop HGVs driving through these incredibly tight streets and (more often than not) getting immobilised on the corner of Sunnyside Blythe Hill and Ravensbourne Road. - help us to attract new , more diverse businesses to the parade. - spruce up shop fascias (as they plan to do on Brockley Rise) - repave the rest of ravensbourne road as the repaying was cut short I necessarily and has left elderly, disable and young children residents with reckless paving to navigate outside their homes. Only last week I tripped over a paving slab on Ravensbourne road with my 6 month old daughter strapped to my chest in the sling. She was forward facing and hit the pavement with me on top of her. I had to take her to A&E for cuts and bruises to her face. This is a direct result of Lewisham short-sightedness and cost cutting when repaving only the smallest of stretches of this road, despite it being a well used pedestrian thoroughfare to Blythe Hill Fields. Please do not leave our parade of shops and our streets neglected as you focus attentions on Brockley Rise. The old book keepers here would make an excellent coffee shop servicing families of children at Rathfern and Kilmorie schools and those visiting Moon Lane Books.	Noted. The Local Plan aims to transform the South Circular into a Healthy Street to address poor air quality, improve local amenity and make movement by walking and cycling safer and easier. There are a number of measures to support this including tree planting. The Local Plan includes policies which address the need to protect and enhance shopping parades, and this would include the parade at Stanstead Road. It is recognised however that new Permitted Development rights provide greater flexibility between changes of use within the new Class E of the Use Classes Order. The Local Plan recognises the important role of the employment area at Standsted Road. It designates this as a Locally Significant Industrial Site, and extends this to include the businesses at 118 Stansted Road, which form part of the new Forest Hill Cultural Quarter. 'Rat runs' are outside the scope of the Local Plan however your comments will be forwarded to our Transport Team.	No change.
	3	LCA	I'd like to submit a few comments on the Local Plan's content and presentation, specifically in relation to the proposals relating to Catford in the Central Area part of the plan.	The Local Plan sets out the long-term strategic development and investment framework for Lewisham. It is focussed on delivering Good Growth, in line with the London Plan – this is growth that is socially and economically inclusive and	Additional evidence base documents will be prepared and inform the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections.

			There are no tangible benefits to existing residents The website contains several well-structured research documents on local attitudes and desires. However, these do not appear to be reflected in the draft Local Plan, which is little more than a Building Plan. I had expected something more visionary, something that would be a roadmap to making Lewisham/Catford a more attractive place to live, not only for new young people but for existing residents. At the moment all that seems to be promised is an intention to make life for car drivers more difficult. Without some clearly stated benefits, I fear there will be little buy-in from residents to the Plan and, on the evidence of the proposal for a 19-storey tower in Catford Green, a strong likelihood of public resistance. **There's no awareness of demographic changes** This plan is covering a 40 year period. It is therefore very surprising that it is so fixed and rigid, assuming that the needs and requirements of 2035 will be the same as those in 2021. The housing target, which seems to be the driver of the Plan, was set before Brexit was implemented and before the pandemic. Of course, we can't predict the effect of these two phenomena but to make no reference to them at all, and to even suggest some flexibility, seems a serious omission. London's population is in decline at the moment. This trend may not be reversed in which case the demand for new homes may be reduced. There's no commitment to solving (at least partially) Lewisham's local housing shortage Part of the justification for the plan is the shortage of housing in Lewisham. I have not been able to find an analysis but it seems that a significant part of the problem is overcrowding. The Plan should demonstrate how the new developments will reduce this. Left to developers, most of the new buildings will be composed of small flats: this will not necessarily help reduce the local shortage. There's no hint of a plan to encourage shops to come back to Catford We've just seen Boots, Peacock and Argos close up. The developments in Catford will remove Tesco, Lidl, Aldi, B&M, Dunelm, Wickes, Halfords and other large shops. The budget supermarkets in particular are essential to a large proportion of Catford's demographic. Unless the Council acts proactively, these shops may not return, people will have no reason to come into the centre of Catford to shop and we just become a dormitory. The programme is incomplete The Plan has boxes identifying when each site will be developed but they're not filled in. It looks very much as if Catford will be a building site for 40 years: this is not an attractive proposition for residents or businesses. A timetable, however tentative, would be, if not reassuring, at least honest.	environmentally sustainable. Part 3 of the Local Plan sets out key spatial objectives for the 'central area' – which make clear the Council's aspirations and priorities for improving specific neighbourhoods for the benefit of local residents and others. The Local Plan covers a 20-year period. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues The Council is required to review its adopted Local Plan every 5 years and consider the scope for changes informed by monitoring and new evidence. The review process will allow for consideration of the longer term impacts of Covid-19 and Brexit. The Local Plan recognises the important role of Catford major centre in the town centre hierarchy. It sets out the strategic framework to support its comprehensive regeneration and revitalisation. Further details are set out in the Catford Town Centre Framework, which the Council has prepared to help support implementation of the Local Plan. Part 4 of the Local Plan sets out a monitoring framework, which includes Local Performance Indicators – these are metrics against which performance in delivery will be reviewed. Part 2 of the Local Plan on Green infrastructure sets out approaches to protect and enhance green spaces, including by addressing identified areas of deficiency. Disagree that the plan is ageist. The Local Plan includes policies which address the wide range needs of people in the Borough, including older people. This includes design policies to ensure inclusive buildings and environments, along with accommodation for older people. The Local Plan supports the London Plan target for 90% of journeys in inner London to be made by walking, cycling and public transport.	

			There's no acknowledgement of any lessons learnt from the towers of Lewisham Lewisham Council needs to rebuilt its credibility in managing development projects. This is not just because of the development in Lewisham but also other planning controversies, such as Millwall and the missing footbridge at Catford Green/Doggett Road. Everyone I have spoken to about the new towers in Lewisham thinks it is terrible. This may not be your view, but either way there must be some lessons (what went well, what didn't go well) you've learned that will inform how you will manage future developments. Simply ignoring what has happened in central Lewisham gives a strong impression that this is not a reflective organisation and we should not pay much attention to the Council's promises. There are no actual aspirations beyond unit targets The plan gives a number of units and area for retail for each site, but this does not portray the ambition. It should state how many units of each size, amount of green space (or distance to), the number and type of retail units the Council will hope to attract. Ultimately, these things will be determined by a developer but the Council needs to set its expectations. (It might be helpful too if the Council was more realistic about parking and car-ownership There are no success criteria. At the moment, there seems to be a single success criteria — a building target. If it is achieved it will be a hollow achievement if it results in no change in Lewisham's homelessness, or the flats are unoccupied investments, or the lack of green spaces and crowded transport means that the area is home only to the most economically disadvantaged. Targets could include reduction in homelessness, distance from green spaces, longevity of residency, etc. The 'green' elements are disingenuous No one disagrees with the benefits of more green space, but including a tree map and saying that there are parks within walking distance does not constitute a green vision. A few hanging baskets? Who is going to maintain them? **The plan is ageist** The walking plan, the emphasis on cycling and the anti-car attitude are all clear signals that the Catford of the future is not a place for older people. The only seating area is right next to the A205 and there is not a single mature person in any of the illustrations and no provision for toilets.		
	3	LCA	I would like to add the site in St Asaph road (by the station) and the one in Drakefell road too. They are a bit further away from where I live but I believe the few random "brown land" in our residential area contribute to the HGVs problem.	The Council invited to the public to submit additional sites for consideration as part of the Regulation 18 consultation. However it has been decided that additional sites will not be considered for inclusion as site allocations. This is because the public would not have an opportunity to appropriately comment on the proposals for those sites at the Regulation 19	No change.

				stage. Also, that the Council considers that the existing site portfolio is sufficient to meet identified needs, including for housing and business space. The site submissions will be considered in any subsequent Local Plan review, which the NPPF requires to be undertaken every 5 years.	
Blackheath Society no 2	3	LCA	**Key spatial objective 1** claims that delivery of the Bakerloo line extension and Lewisham interchange upgrade will 'help to unlock the development potential' of the Opportunity Area. This same expression is used seven times in the Plan in connection with the BLE, but there is no explanation of why development potential would remain 'locked' without the BLE, and what would happen if it is not delivered.	Some examples of how the BLE can unlock the development potential of sites and areas include: incentivise landowners to assemble and bring forward sites for redevelopment and help to ensure the optimal use of land, including higher density development in highly accessible areas. Additional details will be included in the policy supporting text.	Commentary on the BLE has been amended throughout the plan, including explanation about how it can unlock the development potential of sites.
Blackheath Society no 2	3	LCA	While we support the objective of renewal of Lewisham major centre as outlined in **Key spatial objective 2**, we think the ambition of making it into a metropolitan centre and the proposed scale of the new Lewisham Shopping Centre as outlined in Site allocation 2 are too ambitious. They suggest a degree of intensification (height, density, footfall, traffic) that is too great for the constrained central area surrounded by low-rise traditional residential streets and railway lines and bisected by a network of busy arterial corridors (A20/A21, etc.). It is also too dependent on the arrival of the BLE in Lewisham by 2030 (unlikely) and by there being no slowdown in local population growth or housing, retail and other economic demand following Brexit and covid. Despite major residential/mixed developments and road/river infrastructure changes over the past 5-10 years, traffic congestion remains a major problem throughout central Lewisham and through to Catford along the A21 corridor, as well as in adjoining neighbourhoods (including Blackheath), while much existing, refurbished and new retail space in Lewisham town centre remains unlet. The same fate potentially awaits Catford, which has similar problems and constraints, if it is remodelled and redeveloped in the same way and on broadly the same scale as Lewisham (as Site allocations 19-22 imply), without any of the lessons of Lewisham's recent redevelopment being learnt. This includes the adverse impact on place, skylines and adjoining neighbourhoods and communities of extremely tall towers located very close together, close to busy transport corridors and with inadequate public realm in terms of space, noise, air quality and greenery. There can be no realistic expectation either that local infrastructure can be funded, expanded and upgraded sufficiently and quickly enough to support the planned expansion of residential, retail and commercial activity.	The Local Plan has to demonstrate where it will accommodate growth to meet its annual target set by the London Plan of 1,667 new homes per annum. Our approach, which is outlined in the spatial strategy is to accommodate this growth in opportunity areas and town centres. We believe that this is a sensible and sustainable approach which directs development in those areas which are highly accessible in terms of public transport, jobs and local services whilst protecting our lower-density residential and conservation areas. The ambition of making Lewisham a metropolitan centre by attracting investment and increasing viable town centre uses is one which has broad support and was established in the Lewisham Town Centre Local Plan. The vision and Framework for Catford Town Centre was endorsed by Mayor and Cabinet and can be found on the Councils website.	No change.
Blackheath Society no 2	3	LCA	**Key spatial objective 3: secure the re-routing of the South Circular (A205) at Catford.** This is a good aspiration in itself, regardless of its role in regeneration, if it eases and speeds up traffic flow through Catford.	Support noted	No change.

Blackheath Society no 2	3	LCA	**Key spatial objective 4: transform A21 corridor into a 'healthy street'.** We agree that this busy corridor is in need of improvement. It has a number of bottlenecks, which have recently been made worse (especially near Ladywell) by road layout changes designed to improve bus and cycle lanes. However, for both roads, it is mainly the nature of the route, their intersections, and the weight of traffic they carry that is the problem. Since these roads are controlled by TfL, whose priority is to keep traffic moving, it is very difficult for Lewisham to secure improvements for other users, but all too easy for it to make things worse. The 're-development of out-of-centre retail parks and buildings for a wider mix of uses' (Objective 4) and 'the comprehensive regeneration of Catford major centre' (Objective 2) both sound likely to intensify use and exacerbate existing traffic problems and lead to anything but 'heathy streets'. These are observations rather than criticisms, but point to a dangerous clash of unresolved priorities that the Plan not does acknowledge, explain or justify in terms of key policy objectives.	The Local Plan supports the London Plans target of significantly reducing vehicular traffic within the capital. We recognise that some streets will still function as roads for carrying significant volumes of traffic such as the A21. However we also believe that these streets can still be significantly improved to make walking and cycling more attractive. TFL/GLA have detailed guidance on how this can be achieved We will continue to work with TFL and lobby for improvements along routes that are controlled by TFL.	No change.
Blackheath Society no 2	3	LCA	**Site allocation 6: land at Conington Road and Lewisham Road (Tesco)**.We support the redevelopment of this site to complement the redevelopment of Site allocation 5 Conington Road, where construction began recently (March 2021). In particular, it offers the prospect of generating the matching funding required to upgrade the river corridor and public realm. However, we have serious concerns about the proposed scale of and development requirements/guidelines for the site, which appears to propose development of both residential units [70% land use] and non-residential floorspace [30% land use]) at least as intense as the adjoining approved Conington Road development [mainly residential]. The indicative development capacities and similar Development requirements and guidelines for both sites imply similar heights and density, despite the requirement that the design of the Site allocation 5 development should respond positively to the low-rise residential properties and historic Eagle House at the site's eastern side and to the existing historic fabric towards the southern end of the site. We strongly opposed dense development and an extremely tall tower for Site 5 Conington Road, along with many residents in the local neighbourhood. This led to a highly contested application that eventually went to appeal. Site allocation 6 is even nearer to traditional low-rise residential housing on Lewisham Road and to Blackheath and St Stephen's Conservation Areas just beyond it. The indicative development capacity represents a major intensification of the combined site. Pedestrian access from this car-free site to the town centre and to Lewisham station and transport hub looks likely to remain severely constrained, especially in the absence of a fully funded commitment to a northern entrance to Lewisham station. The impact of potentially more very tall towers (Site allocation 5 includes a tower of 125m/35 storeys) on the immediate neighbourhood and the on	The methodology for indicative site capacities within the Local Plan is explained within a separate topic paper available on the Council's website. In this instance the indicative site capacity was informed by the London SHLAA methodology. This methodology derived by the GLA was used to assess the capacities for all sites across London contributing to each boroughs housing targets. We appreciate that this will be a step change in density from the existing character of the borough. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	No change.

			skyline of the Greenwich World Heritage Buffer Zone on Blackheath would be very significant. We believe that there should be height restrictions imposed on Site allocation 6 to require it to step down sensitively from Site allocation 5 to neighbouring low-rise residential areas, and that indicative site capacity should be reduced to reflect this and poor pedestrian access to town centre and interchange.		
Culverley Green Residents Association	3	LCA TR 01	The plan also makes no mention of the bottleneck caused by the railway bridge at Catford or the restricted pavements on the bridge over the Hayes line. The south circular at this point is pretty much a permanent car park and traffic jam which adds to an awful environment and terrible air quality. Unless active steps are taken to replace the bridge and widen the road under it and provide better wider pavements under it and over the Hayes line bridge and totally review all the junctions, I fail to see how the Wickes sites can be redeveloped for high density housing. Traffic out of the site from the exit nearest the bridge regularly ignores the left turn only requirements and blocks traffic by turning right. The plan should be making clear proposals as to what solutions are available. Likewise, we fail to understand how any proposals are going to come forward during the life of the Plan to realign the South Circular. TfL have failed for the last umpteen years although I am aware they have not allowed the Council to remove the proposals from the plan. Perhaps the council should indicate a plan B and give a time limit on the period for the life of the realignment.	Noted. The Local Plan aims to transform the South Circular using the Healthy Streets Approach to address poor air quality, improve local amenity and the public realm, particularly to make movement by walking and cycling safer and easier. The Local Plan provides the policy basis for the reconfiguration (re-routing) of the South Circular at Catford Town Centre, and the Council will continue work with Transport for London and other stakeholders to secure the delivery of this project. Development proposals on the Halford and Wickes sites will need to be car-free or car-lite, in line with the London Plan. Any future planning application will need to be accompanied by a Transport Assessment and strategy addressing parking, access and servicing.	No change.
Culverley Green Residents Association	3	LCA EC 10 EC 11	**There's no hint of a plan to encourage shops to come back to Catford** We've just seen Boots, Peacock and Argos close up. The developments in Catford will remove Tesco, Lidl, Aldi, B&M, Dunelm, Wickes, Halfords and other large shops. The budget supermarkets in particular are essential to a large proportion of Catford's demographic A variety of shops brings life to a town these plans seem destined to discourage any form of "vibrant shop life". Unless the Council acts proactively, these shops may not return, people will have no reason to come into the centre of Catford to shop and we just become a dormitory.	Disagree. The Local Plan recognises the important role of Catford major centre in the town centre hierarchy. It sets out the strategic framework to support its comprehensive regeneration and revitalisation. Further details are set out in the Catford Town Centre Framework, which the Council has prepared to help support implementation of the Local Plan. It is recognised however that new Permitted Development rights provide greater flexibility for changes of use within Class E category of the Use Classes Order. This limits to scope for the Local Plan to protect shops.	No change.
Environment Agency	3	LCA Site allocations	**Central Lewisham** This area of Lewisham has a high number of environmental constraints such as high risk flood zones, groundwater source protection zones, waste management sites and main rivers. This requires early pre application discussions to ensure development is informed by the latest evidence and guidance. For sites with one or more environmental constraints we recommend early pre application discussions with the Environment Agency. We have assessed the proposed site allocations against Flood Zones, proximity to rivers and flood defences and groundwater source protection zones. The priority sites for early pre application engagement with the Environment Agency are highlighted in bold below.	The site allocations have undergone assessment relating to flood zones through the SFRA and have also been through the Sequential and Exception tests (where relevant). These evidence base documents will be published on the council's website. Throughout the Local Plan process we have liaised with the Environmental Agency to verify these assessments and to gather comments on the plan. Environment Agency acted as critical friend for the Local Plan SFRA.	Some amendments to sites allocations have been made in line with the comments provided in the table of sites and through correspondence with the EA.

			LB Lewisham officer note: Table of sites with water management information included in original representation.		
Hither Green West Campaign Group	3	LCA	Parks and Green Spaces The Plan should focus significant attention on Mountsfield Park - at 32 acres it is one of the largest parks in Lewisham but has few facilities. Our park needs significant investment and new infrastructure to be provided. This includes cafes, public toilets, benches and other seating, picnic tables, outdoor gyms, tennis courts and other sports facilities, landscaping etc., if it is to meet its current population's needs in addition to the planned growth in population. For example, our park has far fewer of all such facilities than the East sides Manor House Gardens despite being four times the size. Why? The plan should state clearly how new leisure and green spaces will be created in Hither Green West and new formal and informal play spaces provided, which address the needs of people of different ages and abilities.	Mountsfield Park is recognised as a strategic open space in the plan and has also been recommended to be designated as MOL. The Local Plan is a strategic policy document but is underpinned by the Parks and Open space strategy. This strategy outlines improvements required for the park.	Local Plan amended by designating Mountsfield Pasrk as a MOL and Startegic Open Space.
Hither Green West Campaign Group	3	LCA	A style guide should be developed for street furniture and public facilities, which enhance the local character and reflect the location's heritage. For example, the predominantly Victorian character of Hither Green West should be reinforced by re-introducing appropriate heritage lampposts, benches, shelters and other seating; post-boxes; wayfinding signage and other street furniture. Residents and visitors enjoy historic high streets and shopping parades. Our street should also be de-cluttered, including removing phone boxes from Hither Green as they are unsympathetic to the largely Victorian setting, and are currently used mainly for outdoor advertisements. The boxes are also poorly maintained and are frequently used for drug dealing and toileting.	The Local Plan is a strategic planning policy document, and the suggested design guidance is not considered to be proportionate to this. The Local Plan includes policies addressing public realm, however specific measures will need to be considered on a site by site basis. We will pass on your comments to our transport team.	No change.
Lewisham Cyclists	3	LCA Key spatial objectives	Page 50 point 4 and also point 14.6 in the main document refer to "transform the A21 into a Healthy Street". This is also mentioned in the spatial objectives (page 478). We would suggest the wording of this is altered to "adopt the healthy streets approach along the A21 corridor" and encourage the planning team to follow TfL guidance on this which is clear and unequivocal. This should also form part of the strategic planning document for the whole corridor, and form conditions of planning along the corridor, including CIL contributions to part fund improvements.	Noted. It is not considered that this change in terminology will alter the overall intent for the key spatial objectives. However, it is acknowledged that the detailed policies should be amended for consistency with the London Plan. Planning conditions or other legal agreements will be considered on a case-by-case basis, with reference to the Development Plan policies.	Local Plan amended to refer to the 'Healthy Streets Approach' or Healthy Streets Corridor, where appropriate, in line with the terminology used in the London Plan and the A21 Development Framework.
Lewisham Cyclists	3	LCA Key spatial objectives	Page 50 point 8 (page 478, spatial objectives) refers to "Deliver a connected network of high quality walking and cycle routes that link these spaces". Lewisham Cyclists welcome this, but would highlight this would also need to follow London Cycle Design Standards and contributions from developers would need to take this into account in order to avoid a repeat of what happened at the Catford Green Development and bridge to Doggett Road.	Support noted. At its meeting on 16th September 2020 Mayor & Cabinet agreed the transfer of S106 funding originally proposed for the delivery of a footbridge between Doggett Road and the Barratt's development on the former Catford Greyhound Stadium site to be used to deliver a programme of public realm and accessibility improvements to Catford Station areas. This includes looking at options to provide step free access at Catford Station. See M&C report for further details.	Local Plan amended to make clear that the development proposals will be required to meet the London Cycle Design standards, where appropriate.

Lewisham Cyclists	3	LCA Figure 14.2	Page 51 , the map shown has a number of errors, including incorrect alignment for the A21 Healthy Streets corridor. This should be amended.		Additional diagram added to each sub area indicating key links and green routes
Transport for London	3	LCA	The existing bus stand at Thurston Road is the identified site for a BLE station box. The layout of the new station precludes a bus stand on the site. We recommend that the local plan identifies and commits to potential alternative site(s) which could accommodate future bus standing and driver facilities within the locality of: the existing stand, the new BLE station, the existing NR/DLR station and the town centre. Coordination between TfL BLE and bus teams will be crucial to identify and safeguard replacement site(s) to support the delivery of replacement bus standing and driver facilities, which is in close proximity to Lewisham town centre and the interchange facilities. The following site allocations and non-allocated sites have been identified as sites which could accommodate a bus stand in its entirety or split across neighbouring sites, which can share facilities. A number of these site allocations have large proportions of car parking, which could be removed completely or largely to accommodate a bus stand, and this aligns with Borough's climate emergency policy and sustainable transport policies. Site allocations • 1 Lewisham Gateway • 2 Lewisham Shopping Centre • 4 Land at Engate Street • 6 Land at Conington Road and Lewisham Road (Tesco) • 7 Molesworth Street Car Park Non-site allocated sites: • Station Road • Molesworth Street (Highway) TfL is seeking for provision to be made for adequate and appropriate bus standing and driver facilities within the Site Allocations (while continuing dialogue between the Borough and TfL as to the actual location).	The existing Thurston Road bus stand was given to TFL to facilitate the redevelopment of Lewisham Gateway. A key objective of the project was to remove bus standing from the heart of the town centre which was acting as a visual and physical barrier and blight in the centre. Whilst the Council accepts that the bus standing may have to be temporarily re-located along Molesworth street whilst Lewisham Station and the BLE is constructed we see no reason why this cannot then be located back to the original Thurston site. This may require some rationalisation of bus standing and we are happy to have discussions on this issue. All other sites suggested are in third party ownership and many are coming forward for re-development.	Additional site allocation added at Thurston Road to be safeguarded for station use and the continued use for bus standing. Local plan site allocation for Tesco amended to include the provision of bus stand facilities
Transport for London	3	LCA	Site Allocation 3 seems to be missing from the draft local plan.	Noted. This is a formatting error. Site 3 was a placeholder for a site allocation that was included in an early draft of the Local Plan, but not the Regulation 18 stage public consultation version.	Local Plan updated with formatting correction.
London Wildlife Trust	3	LCA 01	We support these principles, especially in respect of Parts F and H)d.	Support noted.	No change.
Blackheath Society no 2	3	LCA 01	Need vision for Blackheath (and for other neighbourhoods, to differentiate them) – see Annex 'Vision'	The Local Plan is a strategic policy document and whilst we have introduced a more granular approach with the sub areas we are unable to have separate visions for all neighbourhoods in the borough. This level of detail may be taken forward through the Neighbourhood Planning process.	No change.
Blackheath Society no 2	3	LCA 01	Need more emphasis on local importance and relationship to World Heritage site and its buffer zone	The importance of the World Heritage Site and its buffer zone is emphasised throughout the plan.	Local Plan amended by making additional references to the World Heritage Site.

Blackheath Society no 2	3	LCA 01	Need for better specification and protection of views across the Heath in many directions	The protection of views is covered in Policy QD5 View Management.	No change.
Blackheath Society no 2	3	LCA 01	Need for a Blackheath Neighbourhood SPD that stitches together policies for Village, Heath and Residential across the full range of Plan policies to 'Reinforce' the neighbourhood's unique character	The Council does not have the budget or the resources to undertake SPDs for all neighbourhoods in the borough. Furthermore Blackheath does not have any significant sites for redevelopment and would therefore not be a priority for an SPD. This level of detail may be taken forward through the Neighbourhood Planning process.	No change.
Blackheath Society no 2	3	LCA 01 HE 02	Need for more reference to Article 4 directions for specific streets and areas within the Conservation Area and need to review conditions and consider enhancing/developing, especially in the face of proposed downgrading of protection against permitted development in Conservation Areas generally	Proactive conservation work will be picked up through the Heritage strategy and action plan	No change.
Hither Green West Campaign Group	3	LCA 01	Given the limited scope for new housing development in Hither Green West (and its location between the two major centres of Catford and Lewisham), we were concerned at the lack of references to Hither Green in all 900 pages of the draft plan. The Plan notes the primarily residential nature of Hither Green. Still, it is silent on how its residential and historical character can be reinforced, preserved, promoted and elevated into a genuinely healthy neighbourhood. The Plan also does not explore the potential for creating new leisure, cultural and community facilities to support the residents, generate employment and bring in additional visitors. Hither Green West is the very definition of a '15-minute neighbourhood' but needs significant investment in public realm enhancements and infrastructure, and a strong vision and Plan, to realise this. The Plan also does not reassure us or explain how Hither Green West will not be left behind. It should be explicit in how Hither Green West will secure significant public realm improvements after decades of under-investment. For example, new or enhanced footpaths or cycleways; road improvements; new street crossings and other safety measures; cycle parking; heritage-sympathetic street lighting and street furniture; new landscaping; tree-planting and other green infrastructure such as pocket parks and squares, play areas and new wayfinding signage etc.	Noted. As the Local Plan is a strategic policy document and whilst we have introduced a more granular approach with the sub areas we are unable to have separate visions for all neighbourhoods in the borough. We have recognised the need to include additional policies on Hither Green, including for the area west of the railway. There are opportunities for the community to provide further non-strategic policies through the Neighbourhood Planning process.	Local Plan amended to include new spatial objectives and policies for Hither Green, including area west of railway. Local Plan amended to designate Hither Green Lane as a local centre.
Quaggy Waterway Action Group	3	LCA 01	**LCA1 Central Area place principles** F **The river valley network is a defining feature of the Central Area which development proposals should respond positively** to by: a. Ensuring that development is **designed to improve the ecological quality of the Ravensbourne and Quaggy rivers, including by naturalising the rivers, wherever opportunities arise**; b. Ensuring the **layout and design of development gives prominence to the rivers and the river valley, and enhances their amenity value, including by better revealing them**; and	The plan is supported by River Corridor Improvement Plan SPD which provides this level of detail.	Local Plan amended to refer to the River Corridor Improvement Plan SPD within the text for site allocations with riverfront access

			c. Facilitating the **provision of new and enhanced connections to and along the rivers and river valleys, including by extending and improving the Waterlink Way**. Walking and cycling links to the river from the town centres of Lewisham and Catford, and the A21 corridor, will be strongly supported G Development proposals for tall buildings in the Central Area will only be acceptable in those locations identified as being appropriate for tall buildings, having regard to the requirements of Policy QD4 (Building heights). H The Council has prepared evidence base documents and planning guidance to assist with understanding of the distinctive characteristics of the neighbourhoods and places within the Central Area, and to help ensure coordination in the delivery of new investment. Development proposals should refer to and positively engage with these documents, including: a. Lewisham Characterisation Study (2019); b. Catford Town Centre Masterplan (Forthcoming); c. A21 Design Guidance SPD (Forthcoming); and d. River Corridor Improvement Plan SPD (2015). **QWAG comments:** How will the ecological quality of the rivers and their corridors be assessed to inform decisions? The Plan should be clear about the tools and methods to be used as standard to inform good decisions making on ecological function and restoration. The Plan should also be clear about where restoration potential exists even where this is not in keeping with a development schemes coming forward. Too much reliance has been place on the chance that river restoration might occur when and if a developer takes an interest in a parcel of land. The Plan needs to be more proactive in restoring the ecological condition and natural function of rivers and waterbodies irrespective of whether a development opportunity arises.		
London Wildlife Trust	3	LCA 02	We support this policy in respect of Part F.	Support noted.	No change.
	3	LCA 02	We have been very disappointed by the very poor quality of design of Lewisham Gateway. The replacement of the previous roundabout with a new set of junctions seems to have led to worse traffic jams than before, buses stacked up trying to get through, a terrible pedestrian experience with desire lines ignored, awful wind tunnel effects on occasions and a complete failure to improve the rivers running through the scheme which remain immured in concrete and barely visible and contributing nothing to improving the opportunities for wildlife and biodiversity, never mind there being no green space just some paving and a few random planters. If this is the standard of what is to come in Catford then we will be objecting vigorously.	Noted. Development for which planning consent has been granted and/or built is outside the scope of the Local Plan. The Local Plan introduces a refreshed suite of policies on urban design, and requires that all new development is character-led and delivered through a 'design-led' approach. The Local Plan sets out the strategic framework to support its comprehensive regeneration and revitalisation of Catford major centre. Further details are set out in the Catford Town Centre Framework, which the Council has prepared to help support implementation of the Local Plan.	No change.
Quaggy Waterway Action Group	3	LCA 02	**LCA2 Lewisham major centre and surrounds** Page 483	The plan is supported by water management policies, and River Corridor Improvement Plan SPD which provides this level of detail. River corridor	Local Plan amended by making reference to the River Corridor Improvement Plan SPD.

			A Continued investment in Lewisham major centre to enable its transition to a metropolitan centre of sub-regional significance in London, and a gateway to the south east, is a strategic priority. To realise this objective and secure the centre's long-term vitality and viability, development proposals must contribute to a coordinated process of **transformational improvement to the town centre environment**. They should also deliver a complementary mix of uses, including new housing, whilst ensuring that the centre's predominant commercial role is maintained and enhanced. F **Development proposals will be expected to maximise opportunities to improve the ecological quality and amenity value of the river environment. This includes improved access to the River Ravensbourne by extending and enhancing Waterlink Way that traverses the wider town centre area, and the River Quaggy at Lee High Road. Proposals should make provision for attractive and robust embankments as a central design feature, particularly along the River Ravensbourne to enhance connections from Silk Mills Path to Lewisham transport interchange and the Lewisham Gateway site, leading to the town centre and the Primary Shopping Area.** **QWAG Comments:** What counts as 'attractive and robust embankments as a central design feature' and how does that advance ecological quality and potential? How will this policy ensure that development in central Lewisham, especially regarding the rivers, have both ecological function and design and amenity value? This clarity is needed especially in relation to the section on **LCA1 Central Area place principles** (see above) i.e.,: F **The river valley network is a defining feature of the Central Area which development proposals should respond positively** to by: a. Ensuring that development is **designed to improve the ecological quality of the Ravensbourne and Quaggy rivers, including by naturalising the rivers, wherever opportunities arise**; b. Ensuring the **layout and design of development gives prominence to the rivers and the river valley, and enhances their amenity value, including by better revealing them**; and… How will assessments of 'maximised opportunities' be made? The Plan should be clear on the ecological tools that will be used as the norm to inform an open and transparent assessment of the opportunities to inform decisions.	improvements will be considered on a case-by-case basis through the development management process.	
Quaggy Waterway Action Group	3	LCA 02	**LCA3 Catford major centre and surrounds** H **Development proposals will be expected to maximise opportunities to improve the ecological quality and amenity value of the river environment**. This includes measures to **deculvert and naturalise the River Ravensbourne near Catford and Catford Bridge Stations, and to improve public access to the Waterlink Way by repairing the existing break in the path and extending the route to join with the River Pool Linear Park**. Proposals	The plan is supported by water management policies, and River Corridor Improvement Plan SPD which provides this level of detail. River corridor improvements will be considered on a case-by-case basis through the development management process.	Local Plan amended by making reference to the River Corridor Improvement Plan SPD.

			should make provision for **attractive and robust embankments** as a central design feature to enhance connections to town centre's western gateway, Ladywell Fields and the train stations. **QWAG Comments:** 'Attractive and robust embankments' needs defining as it could mean the river being canalised and kept in concrete or other hard surfacing. The policy needs to be explicit about restoring the river to a naturalised condition which allows it to perform a proper ecological function, not merely be landscaped in ways which allow public access but without ecological merit and opportunities for engagement with and understanding of the river and its role.		
TIDE CONSTRUCTION LTD	3	LCA 02	**Policy LCA2 – Lewisham Major Centre and Surrounds** Part B of draft Policy LCA2 states: *Development proposals will be expected to help facilitate the delivery of strategic transport infrastructure necessary to ensure the centre can effectively serve, and benefit from, a wider sub-regional catchment and to support Opportunity Area objectives. This includes the Bakerloo line extension, Lewisham station interchange, land required for bus services and walking and cycle routes. Detailed site-specific requirements are set out in the site allocation policies for the Central Area.* The wording of this draft policy is not sufficiently clear as to how development proposals will be expected to help facilitate the delivery of strategic transport infrastructure, and at what stage in the development process this will be required. It is ambiguous and could suggest that this is a blanket requirement which will apply to all development proposals, regardless of their scale and whether there is an infrastructure requirement as a direct result of the development. Instead, site-specific requirements or planning obligations should be established through site allocations (as referred to in the policy), or through the development management process as part of the determination of planning applications.	Disagree. The text indicates that in this area the Council will look to new developments to help facilitate strategic transport infrastructure – it does not impose a blanket requirement on all sites. Furthermore the text specifies that detailed site specific requirements are set out in the site allocation policies for the Central Area. For other windfall sites coming forward, planning obligations will be determined on a site by site basis in the usual way.	No change.
London Wildlife Trust	3	LCA 03	We support this policy in respect of Part H.	Support noted.	No change.
	3	LCA 03	The Lewisham Local Plan has been rejected by seven residents of Brokdale Road, Bradgate Road, Scrooby Street and Wildfell Road. A plan like this should never ever have crossed your mind of yourself and the councillors of Rushey Green. This is our abode, where we live, raise our children grandchildren. So do other useful things. We are disappointed by the council, the local MP and Councillors.	Objection noted.	No change.
Theatres Trust	3	LCA 03	Policy LCA3: Catford major centre and surrounds	Support noted	No change.

			Part F.a of this policy supports the retention of the Broadway Theatre as “integral local landmark and cultural destination”, with new development and public realm improvements to maintain its prominence. Such emphasis on the Broadway is welcomed and beneficial in supporting the wider function and vitality of the town centre. As consumer habits continue to evolve, in particular resulting in challenge to retail, the value and importance of cultural facilities such as the Broadway as an anchor to bring people into the centre is likely to increase.		
London Wildlife Trust	3	LCA 04	We support this policy in respect of Part B)d.	Support noted.	No change.
London Wildlife Trust	3	LCA 05	We support this policy in respect of Parts B and C.	Support noted.	No change.
	3	LCA 05	We have been very disappointed by the very poor quality of design of Lewisham Gateway. The replacement of the previous roundabout with a new set of junctions seems to have led to worsen traffic jams than before, buses stacked up trying to get through, a terrible pedestrian experience with desire lines ignored, awful wind tunnel effects on occasions and a complete failure to improve the rivers running through the scheme which remain immured in concrete and barely visible and contributing nothing to improving the opportunities for wildlife and biodiversity, never mind there being no green space just some paving and a few random planters. If this is the standard of what is to come in Catford then we will be objecting vigorously.	Whilst we note your view this is not the perception of all. Whilst we recognise that the roads around Lewisham Gateway are congested the existing roundabout with bus standing in the middle was a significant barrier and blight on the town centre. The new arrangement, whilst we accept is still busy is a much more rational and legible experience for pedestrians. It should also be noted that when the Lewisham Gateway work is complete there will be a central pedestrian route, which links Lewisham Station to the Shopping centre. The intension is to continue this route through the redevelopment of the shopping centre.	No change.
Lewisham Cyclists	3	LCA SA 01	**Lewisham Gateway**; the current site allocation opportunities (14.20) fails to take into account that the junction does not meet current London Cycle Design Standards, and scores poorly on Healthy Streets scoring matrix. Any future development should note in the development requirements (14.21) should involve the junction being designed to meet London Cycle Design Standards and also follow the council’s own transport strategy, detailing a strategic cycle route along the A21 and connecting to Brookmill Road via the A20. The junction should also be redesigned to enable more people to walk and cycle from Lewisham High Street to access new development, a major transport interchange and existing business. Lewisham Cyclists want this to be listed explicitly in the Development guidelines.	We are currently discussing with TFL, who control the road options to improve walking and cycling through Lewisham Town Centre. Further work will be outside the remit of the Local Plan.	Lewisham Gateway site allocation amended to include continued improvements to walking and cycling. Local Plan amended to refer to London Cycle Design standards.
Quaggy Waterway Action Group	3	LCA SA 01	• High quality public realm must be fully integrated into the site area. Particular attention should be given to key pedestrian locations, including the connections between the station interchange and High Street to the south, linking Lewisham Gateway to the heart of the town centre. Proposals should also be designed having regard to their relationship with adjoining strategic sites, including those at Loampit Vale to the east and Connington Road to the north. • The Rivers **Quaggy and Ravensbourne pass through the site but are culverted and canalised. Proposals will be expected to investigate and maximise opportunities to reinstate the rivers and their corridors as a prominent**	A feasibility study was undertaken to look at re-naturalising the river in front of the church and Lewisham Station. This unfortunately determined that it was not possible.	No change.

			feature in the development, along with facilitating improvements to Waterlink Way. This should be supported by delivery of a **new coherent public open space which focuses on the confluence of the rivers.** • Development must respond positively to the St Stephen's and Belmont Conservation Areas, and the St Stephen's Church (Grade II). **Clear visual links to the church, situated to the east of the site boundary, should be established and maintained**. **QWAG Comments:** This is dated although the potential remains to remove the River Quaggy from concrete in front of St Stephen's Church and Lewisham Police Station as should have been done during the Gateway scheme and with S106 funds dedicated to the purpose. That would be consistent with keeping open visual links to the church and creation on quality open space.		
Transport for London	3	LCA SA 01	This site is in PTAL 6b and the existing planning consent allows for the provision of 500 car parking spaces. There is no mention of cycle parking in this phased development. Since there are various phases of this development, to comply with the London Plan policies, we highly encourage any future changes and planning permissions are geared toward car-free development for both residential and non-residential uses (London Plan compliant disabled persons' parking is always permitted). A reduction in car parking provision will achieve better air quality in this air quality focus area, as well as make better use of land and reduce costs. Dedicated cycle lanes should be considered where appropriate to improve safety and encourage people to cycle.	As stated this site has an existing permission and any reserved matters that come forward will be in accordance with the approved permission. Whilst we cannot insist on a reduction in parking and increasing cycle parking it is something that we regularly discuss in pre-app discussions with developers through the reserved matter stages and will continue to do so.	No change.
Transport for London	3	LCA SA 01	14.22 - We appreciate coordination with TfL and Network Rail to 'make appropriate provision for transport infrastructure'. Based on ongoing discussions and the text in 14.22 (quoted below), the draft Plan is unclear about the future of Thurston Road bus stand. It is recognised that as a result of the BLE station, replacement bus standing and associated driver facilities will be required. In the event that the site is needed for NR station improvements, bus standing capacity and associated facilities must be suitably relocated. Arrangements to do this (whether temporary or permanent) must be agreed with TfL as owner and operator of the site. A reference to these site allocations in this paragraph 14.22 and specific clarity on re-provision of existing transportation infrastructure would be helpful. 'Transport for London proposals for the extension of the Bakerloo line provide for the possibility of infrastructure requirements at this site, including a new 'station box', being located partly on the existing bus ~~**layover site**~~ **stand and below adjacent sites** at Thurston Road. Applicants must consult Transport for London and Network Rail to ensure development makes appropriate provision for transport infrastructure **and services'**.	The bus stand will be relocated back to Thurston Road once the station work is complete.	Thurston Road Bus Station site allocation has been added to the Plan to provide clarity.

Lewisham Cyclists	3	LCA SA 04	**Endgate street**; This site needs to recognise the council transport strategy to deliver the A21 Healthy Streets corridor in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the Development requirements as part of the public realm strategy.	Agreed.	Land at Engate Street site allocation amended by refering to Healthy Streets corridor and no reduction of footway and carriageway.
Lewisham Cyclists	3	LCA SA 05 LCA SA 06	**Conington Road & Land at Conington Road and Tesco**; Both sites need to provide enough space on Silk Mills path for high quality public realm to link the proposed new public square. Building lines need to take this into account in the development guidance.	Agreed.	Conington Road site allocation and Land at Conington Road and Lewisham Road (Tesco) site allocations amended to allow sufficient space along the Silk Mills Path.
Quaggy Waterway Action Group	3	LCA SA 06	Site allocation 14.36 Comprehensive mixed-use redevelopment with compatible main town centre, commercial and residential uses. **Public realm and environmental enhancements including new public open space, improved walking and cycle routes, and river restoration**. Opportunities 14.37 This site occupies an important transitional position from the surrounding residential area leading into the heart of Lewisham major centre from the north. The River Ravensbourne runs along its western edge. The site is currently occupied by a large format retail building and car park. Comprehensive redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the long-term vitality and viability of the town centre. **Redevelopment will also enable river restoration works along with other public realm and environmental improvements, better connecting the site to its immediate surrounds and the interchange.** 14.38 Development requirements • The site must be re-integrated with the surrounding street network to improve access and permeability into and through the town centre, with enhanced walking and cycle connections to residential areas and public spaces. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors, centred on an improved Silk Mills Path. • Positive frontage with active ground floor frontages along key routes. • Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including: • A new public square linked to Silk Mills Path; • **River restoration and a riverside walk** • **Development must be designed to improve to the ecological quality and amenity value of the River Ravensbourne, including a riverside walk incorporating the existing bridges with an attractive and robust embankment.** 14.39 Development guidelines • Development should provide for a complementary mix of uses which support but do not detract from the vitality and viability of Lewisham town centre, particularly the Primary Shopping Area. • The site should function as a transitional site, both in terms of land use and visual amenity, from the surrounding	The intention is to re-naturalise the river subject to EA approval. The council has secured substantial S106 funding from Connington Road who also prepared design proposals as part of the submission. The intention is for this to come forward when the Tesco site is developed. The Local Plan is underpinned by our River Corridor Improvement Plan SPD which provides further guidance.	Conington Road and Lewisham Road (Tesco) site allocations amended to make reference to the River Corridor Improvement Plan SPD.

			neighbourhoods into the transport interchange, Lewisham Gateway and the heart of the town centre. The design of development must respond positively to the residential properties at the site's eastern side, at Conington Road and beyond. • New development should provide high quality urban spaces with generous, functional and formal landscaped areas forming the central part of an improved Silk Mills Path and the river corridor. **Dissecting Silk Mills Path should be access from Lewisham Road and Conington Road, linking to the river and Lewisham interchange**. **• Development should respond positively in scale, bulk and massing to the River Ravensbourne, taking advantage of the natural slope of the site. The river embankment should be visually and physically accessible from Conington Road and improve access to Lewisham transport interchange, Lewisham Gateway and the wider town centre environs.** • Development should respond positively to the scale and grain of the existing historic fabric towards the southern end of the site, at Silk Mills Path and Lewisham Road. • Car parking provision should be the minimum required, reflecting the high level of public transport accessibility of the site. • Development should respond positively to Eagle House, which sits on the site's eastern edge fronting Lewisham Road. This building was constructed in approximately 1870 and is one of the original Anchor Brewery Buildings. It is of architectural and local significance. **QWAG Comments:** It is not at all clear what is meant by 'river restoration'. The Council may be using the term because it has been used by the developer Meyer Homes but it is far from clear that the development will restore the river. Does the site policy as presented here now mean that the river will be removed from concrete at this location and the river allowed to flow with a natural bed and banks? Clarity is required as QWAG has sought to find out what the developer means by 'river restoration' because the term was being used quite loosely by the developer and their agents and it remains unclear whether the actual intention was to restore the river. Meyer Homes eventually revealed that having used the term 'river restoration' liberally in its promotional material and public consultations, the river would not be restored in any true use of the term because the river would remain in concrete and the focus of the development would be on landscaping and hard surfacing to provide some public access but separated from the river and keeping the river in concrete. The policy here seems to continue that approach with terms such as 'robust embankment'. The proper potential to restore the river in keeping with ecological need should be adopted instead of another major riparian development opportunity being missed.		

Royal Borough of Greenwich	3	LCA SA 06	Land at Connington Road/Lewisham Road (Tesco): While we support the development of this site, we are aware that previous proposals have included tall elements, and the allocation should be clearer about appropriate building heights, given that a tall building on this site would have a direct impact on neighbourhoods within Royal Greenwich.	Noted. Following the Regulation 18 consultation the council has undertaken additional work on the Tall Buildings Study. This has informed the revised local plan approach on building heights.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
Lewisham Cyclists	3	LCA SA 07	**Molesworth Street Car Park;** This site needs to recognise the council transport strategy to deliver the A21 Healthy Streets corridor in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.	Noted but this site needs to remain undeveloped as it is required for flood storage.	Molesworth Street Car Park site allocation has been removed from the Plan
	3	LCA SA 08	I am very concerned about the re-development of Lewisham Retail Park, Loampit Vale into a mixed use residential and commercial area.	Lewisham Retail Park has an existing approved planning application.	No change.
	3 - General	LCA SA 08	In addition to two major retailers, Sports Direct and Matalan currently onsite, Lewisham Retail Park, Loampit Vale is the home of SET Lewisham, a community artist-led studio and project space, and Lewisham Wing Chun, a full time school, part of the WCUK organisation, led by Sifu Paul Thompson, that teaches adults and children self-defense. Both spaces – SET Lewisham and Lewisham Wing Chun – have significantly benefited the community, cultural values and well-being of Lewisham and its residents since they started at this former Mothercare retail space spanning 12,000 sq ft in January 2019. While I will speak more about the value of SET Lewisham, some testimonials from the Lewisham Wing Chun have described the following: - I started training with Sifu 8 months ago and I can honestly say that I look forward to every session! He gives the school a unique family feel, a welcoming and fun environment, where I feel safe and confident training. With a perfect balance between wise and lively, he's very approachable and provides gentle correction. I definitely feel more confident in day-to-day life, and I look forward to many more lessons! - As a total beginner to martial arts, Sifu Paul made me feel at ease and went at my pace while still keeping it dynamic and allowing the class of mixed ability to progress together and challenging everyone. Highly recommend to anyone looking for a fun and exciting way to get fit and learn a new skill. - Sifu Paul's classes are fun and lively. The content is accessible from improving fitness to developing a technique and applying it to a given situation. There's also an element of fun and laughter within classes. Time spent with Sifu is always looked forward to.	Lewisham Retail Park has an existing approved planning application.	No change.
	3	LCA SA 08	To "re-develop" Lewisham Retail Park, Loampit Vale would mean the absolute destruction of two community spaces which have actually helped Lewisham thrive and grow as a community and bring its residents together, especially in a time of global uncertainty. While the pandemic has	Lewisham Retail Park has an existing approved planning application.	No change.

			brought its challenges to everyone, I fear that Lewisham Retail Park, Loampit Vale is vulnerable to being "re-developed" and completely compromising this vision and values that the Local Plan is proposing.		
	3 -	LCA SA 08 General	SET Lewisham, in particular, where I am an artist and share a studio space, has completely transformed in the two years I have been there. As artists and a community in South East London, we are resourceful, creative and have been able to meaningfully use this space to create independent artist studios, where was nothing. Part of the wider SET network of studios across London with a membership of over 500 individuals, SET Lewisham has been a cultural hub for young and emerging artists, especially individuals finishing degrees in fine art, design and film at some of the most prestigious universities in the U.K. and internationally including Central Saint Martins, the Royal Academy of Arts, the Royal College of Art, and Goldsmiths, University of London. It has become a safe space to think, make, create, and exchange ideas. SET Lewisham has always been welcoming and inclusive of all individuals and backgrounds, especially from the LGBTQ+ community, people of colour, and low income households, and consistently provides a high quality and affordable studio space to ensure its inclusivity. The ability to have an affordable studio space is especially important for younger individuals who are struggling with money and being able to afford an artist studio and somewhere to live. I am fortunate to have been able to afford and use a studio for the past two years and I can see with such clarity how invaluable the SET Lewisham space has been for myself and the fellow artists who have a studio here, not just to make work, but a place to safely keep their work overnight, grow and develop ideas and their professional practice. The building is ideal for various artistic practices because it has lots of natural light, hardwood floors, and high ceilings, primarily based on ground level for easy access and transport; these features are truly incredible and impossible to find in London. There is also a regular team of cleaners who ensure it is looked after and maintained. It is also very useful and convenient that SET Lewisham is within 20-30 minutes of walking or bicycling from home for most artists and has subsequently connected the artists and studio more closely to the local businesses and community of Lewisham. As part of the building, there is a project space which has also been fruitful for artists to make new and ambitious work, as well as present free exhibitions of contemporary art, injecting new energy and vitality into the community of Lewisham and individuals from the art community, who can easily access the space within 15 minutes of public transport. This project space has also become increasingly collaborative and interdisciplinary, hosting performance	Lewisham Retail Park has an existing approved planning application. The Local Plan does however seek to protect cultural, community and employment uses within the borough and we will work with the developer to understand how this space can be relocated. The Councils Economic Development department also play a role in looking for suitable alternative space and we will pass on your comments.	No change.

			art, dance, music, screenings, poetry readings, creative and educational workshops, a guest curated residency programme and other free, live events for the community of Lewisham and aligned with Lewisham's greater vision as it prepares to host the London Borough of Culture 2022. There is a constant fear among artists in metropolitan cities such as London that their studio building will close down only after a few years or even months after opening and made into residential housing or mixed use. This fear not only inhibits the creative spirit but diminishes the capacity for an individual to authentically pursue a creative practice and professional career.		
	3	LCA SA 08	The reality is this fear is true and the proposed Local Plan is a stark reminder and call to action that spaces like SET Lewisham, despite how obviously valuable they are to the community of Lewisham and the greater art community, are vulnerable and can not be taken for granted; we must secure this space and work our hardest as a community to ensure it is not destroyed and lost forever.	Lewisham Retail Park has an existing approved planning application. The Local Plan does however seek to protect cultural, community and employment uses within the borough and we will work with the developer to understand how this space can be relocated. The Councils Economic Development department also play a role in looking for suitable alternative space and we will pass on your comments.	No change.
	3	LCA SA 08	I am writing to you to express my concerns about the redevelopment of Lewisham Retail Park, Loampit Vale into a mixed use residential and commercial area.	Lewisham Retail park has an existing approved planning application.	No change.
	3 -	LCA SA 08 General	In addition to two major retailers, Sports Direct and Matalan currently onsite, Lewisham Retail Park Loampit Vale is also the home of SET Lewisham, a community artist-led studio and project space, and Lewisham Wing Chun, a full time self defence school for adults and children, part of the WCUK organisation led by Sifu Paul Thompson. Both spaces – SET Lewisham and Lewisham Wing Chun – have significantly benefited the community, cultural values and well-being of Lewisham and its residents since they started at this former Mothercare retail space spanning 12,000 sq ft in January 2019.	Lewisham Retail Park has an existing approved planning application. The Local Plan does however seek to protect cultural, community and employment uses within the borough and we will work with the developer to understand how this space can be relocated. The Councils Economic Development department also play a role in looking for suitable alternative space and we will pass on your comments.	No change.
	3	LCA SA 08	To "re-develop" Lewisham Retail Park, Loampit Vale, would mean the absolute destruction of two community spaces which have actually helped Lewisham thrive and grow as a community and bring its residents together, especially in a time of global uncertainty. While the pandemic has brought its challenges to everyone, I fear that Lewisham Retail Park, Loampit Vale is vulnerable to being "re-developed" and completely compromising this vision and values that the Local Plan is proposing.	Lewisham Retail Park has an existing approved planning application. The Local Plan does however seek to protect cultural, community and employment uses within the borough and we will work with the developer to understand how this space can be relocated. The Councils Economic Development department also play a role in looking for suitable alternative space and we will pass on your comments.	No change
	3 -	LCA SA 08 General	SET Lewisham, in particular, where I am an artist and share a studio space, has completely transformed in the time I have been there. As artists and a community in South East London, we are resourceful, creative and have been able to meaningfully use this space to create independent artist studios, where there was nothing.	Lewisham Retail Park has an existing approved planning application. The Local Plan does however seek to protect cultural, community and employment uses within the borough	No change.

			Part of the wider SET network of studios across London with a membership of over 500 individuals, SET Lewisham has been a cultural hub for young and emerging artists, especially individuals finishing degrees in fine art, design, fashion and film at some of the most prestigious universities in the U.K. and internationally including Central Saint Martins, the Royal Academy of Arts, the Royal College of Art, Goldsmiths, University of London and the Ruskin School of Art, Oxford University. It has become a safe space to think, make, create, and exchange ideas. SET Lewisham has always been welcoming and inclusive of all individuals and backgrounds, especially from the LGBTQ+ community, people of colour, and low income households, and consistently provides a high quality and affordable studio space to ensure its inclusivity. The ability to have an affordable studio space is especially important for younger individuals who are struggling with money and being able to afford an artist studio and somewhere to live. I am fortunate to have been able to afford and use a studio at SET for the past year and I can see with such clarity how invaluable the SET Lewisham space has been for myself and the fellow artists who have a studio here, not just to make work, but a place to grow and develop ideas and their professional practice. The building is ideal for various artistic practices because it has lots of natural light, hardwood floors, and high ceilings, primarily based on ground level for easy access and transport; these features are truly incredible and impossible to find in London. There is also a regular team of cleaners who ensure it is looked after and maintained. It is also very useful and convenient that SET Lewisham is within 20-30 minutes of walking or bicycling from home for most artists and has subsequently connected the artists and studio more closely to the local businesses and community of Lewisham. As part of the building, there is a project space which has also been fruitful for artists to make new and ambitious work, as well as present free exhibitions of contemporary art, injecting new energy and vitality into the community of Lewisham and individuals from the art community, who can easily access the space within 15 minutes of public transport. This project space has also become increasingly collaborative and interdisciplinary, hosting performance art, dance, music, screenings, poetry readings, creative and educational workshops, a guest curated residency programme and other free, live events for the community of Lewisham and aligned with Lewisham's greater vision as it prepares to host the London Borough of Culture 2022. There is a constant fear among artists in metropolitan cities such as London that their studio building will close down only after a few years or even months after opening and made into residential housing or mixed use. This fear not only inhibits the creative spirit but diminishes the	and we will work with the developer to understand how this space can be relocated. The Councils Economic Development department also play a role in looking for suitable alternative space and we will pass on your comments.	

			capacity for an individual to authentically pursue a creative practice and professional career.		
	3	LCA SA 08	The reality is this fear is true and the proposed Local Plan is a stark reminder that spaces like SET Lewisham, despite how obviously valuable they are to the community of Lewisham and the greater art community, are vulnerable and cannot be taken for granted. I feel passionately that we must secure this space and work our hardest as a community to ensure it is not destroyed and lost forever.	Lewisham Retail Park has an existing approved planning application. The Local Plan does however seek to protect cultural, community and employment uses within the borough and we will work with the developer to understand how this space can be relocated. The Councils Economic Development department also play a role in looking for suitable alternative space and we will pass on your comments.	No change.
Lewisham Cyclists	3	LCA SA 08 LCA SA 09	**Lewisham Retail Park, Loampit Vale & Land at Loampit Vale/Thurston Road (CarpetRight);** Both sites need to recognise the council transport strategy to deliver the Healthy Streets corridor between Lewisham and Deptford, (either along Jerrard Street once converted to two operation or along Thurston Road) in making sure any development does not result in a reduction in existing footway, cycle lane or carriageway space. This should be detailed in the development requirements as part of the public realm strategy for this site, station redevelopment and connectivity to Lewisham Town Centre.	Agree that Healthy Streets should be acknowledged in relation to Lewisham Retail Park. Development at the Carpetright site has now been completed.	Lewisham Retail Park site allocation amended by refering to Healthy Streets corridor and no reduction of footway and carriageway. Land at Loampit Vale and Thurston Road (Carpetright) site allocation has been removed from the Plan
TIDE CONSTRUCTION LTD	3	LCA SA 09	**Site Allocation 9 Land at Loampit Vale and Thurston Road (Carpetright)** The table on page 515, and the 'existing planning consent' referred to on page 516 require updating to reflect the most recent planning consent on the site. Tide secured outline planning permission (ref. DC19/110610) on 18 October 2019 for the following: *The demolition of the existing building and the construction of two buildings of 20 storeys and 35 storeys in height plus basement comprising: 838.2 sqm non-residential floorspace, comprising (A1) Shops, (A2) Financial & Professional Services, (A3) Restaurants & Cafes, (B1) Business, (D1) Non-residential Institutions and (D2) Assembly & Leisure uses; 67 (C3) self-contained housing units with private and communal amenity space; 758 (Sui Generis) student housing bedspaces with communal amenity space; associated ancillary space, including refuse stores and cycle parking; and landscaping and public realm works.* The table refers to the previous planning permission which was granted on the site in February 2018 prior to Tide purchasing the site, but was not implemented. The indicative development capacity therefore needs to be updated to reflect the most recent planning consent. The development is due to be delivered by Tide by Summer 2021, prior to the start of academic year 2021/22. We suggest that following details in the site allocation are amended for accuracy, to reflect the planning consent	Agreed. Development at the Carpetright site has now been completed.	Land at Loampit Vale and Thurston Road (Carpetright) site allocation has been removed from the Plan

			which has been implemented on the site (ref. DC19/110610): • Planning status This should be updated to state that full application DC/17/102049 was originally granted in February 2018 and a subsequent full application DC19/110610 was granted in October 2019 and has now been implemented. • Timeframe for delivery The timeframe for delivery should state that the site is coming forward in the period 2020/21 – 2024/25. • Indicative development capacity This should be updated to state 319 net residential units (67 residential units and 758 student bed spaces which are equivalent to 252 residential units). • Existing planning consent This should be substituted to refer to planning permission DC19/110610.		
Quaggy Waterway Action Group	3	LCA SA 10	**Silver Road and Axion House - River Ravensbourne** Page 518-519 Site allocation 14.54 Employment-led mixed-use redevelopment comprising compatible commercial and residential uses. Public realm enhancements including **public access and landscaping along the River Ravensbourne.** Opportunities 14.55 The site comprises non-designated employment land located within a predominantly residential area in Lewisham major centre, next to the River Ravensbourne. There are several older commercial units on the site, including a large two-storey warehouse building. Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the long-term vitality and viability of the town centre, including provision of modern workspace. **Redevelopment will also enable public realm enhancements that maximise the amenity provided by the River Ravensbourne**. 14.56 Development requirements • The maximum viable amount of employment floorspace must be re-provided, in line with Policy EC7 (Non-designated employment sites). • Delivery of new and improved public realm in accordance with a site-wide public realm strategy, **including public access to and landscaping along the river**. 14.57 Development guidelines • **Development should respond positively to the River Ravensbourne and be designed to enhance its amenity value, with walking connections and views through the site to the river, and landscaped public realm alongside it.** • Development should maximise employment floorspace provision, including through reconfiguration of the existing buildings and spaces, and **improve the overall**	The developer, encouraged by the Council did look at extensive options to improve the interface with the river. Unfortunately the options were not supported by the Environment Agency and could not be persued.	No change.

			environmental quality of the site. Proposals will be required to justify any net loss of the existing non-designated employment floorspace. • An element of affordable workspace should be delivered on-site. • The site is situated within a predominantly residential area and consideration will need to be given to the amenity of neighbouring and surrounding properties, including for daylight and sunlight. **QWAG Comments:** This is a **major missed opportunity** based on landscaping and public access but without any restoration of the river to address ecological improvement. That would be another example of the only opportunity to carry out river restoration when significant development occurs being squandered. The Local Plan should be clearer about how quality river restoration will be a pre-requite, not an optional extra.		
Lewisham Cyclists	3	LCA SA 11	**PLACE/Ladywell (Former Ladywell Leisure Centre);**This site needs to recognise the council transport strategy to deliver the A21 Healthy Streets corridor in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.	Agreed	PLACE/Ladywell site allocation amended by referencing the A21 Healthy Streets corridor and no reduction in footway or carriageway.
Lewisham Cyclists	3	LCA SA 13	**Driving Test Centre, Nightingale Grove;** This site needs to recognise the council transport strategy to deliver Healthy Neighbourhoods in order to enable more people to choose to walk and/or cycle. Any development on site should not result in a reduction in existing footway or carriageway space and should seek to reduce overall motor traffic volumes in the area. This should be detailed in the development requirements as part of the public realm strategy and appropriate CIL contributions should be made by developers to facilitate this.	Agreed but there is no need to reference CIL contributions in this site allocation as it is dealt with in part 4 of the plan. The Plan should be read as a whole.	Driving Test Centre site allocation amended by referencing no reduction in footway or carriageway.
Lewisham Liberal Democrats	3	LCA SA 14	• From a conversation with the owner of the MOT garage at **35 Nightingale Grove**/**Maythorne cottages** it was discovered that he is unaware that Lewisham Local plan's site allocation affects his business. Does the Council not personally inform local business owners of relevant plans, however long term they may be? It is regrettable that they are ignorant of consultations taking place.	The Regulation 18 consultation was carried out in accordance with the Council's adopted Statement of Community Involvement. To raise awareness about the consultation, the council wrote to all landowners of site allocations (identifying owners through planning records and Land Registry searches) and put up site notices around proposed site allocations. This was in addition to other promotional activity.	No change.
Hither Green West Campaign Group	3	LCA SA 14	The relative lack of leisure, cultural and community facilities or employment spaces in Hither Green West mean residents often have to travel (linked to Transport section below). The area immediately adjacent to main west-side entrance to Hither Green Train Station (Maythorne Cottages and Nightingale Grove) is a prime development location. Its value is wasted by low rise, low intensity, low quality buildings and an industrial yard. New leisure, cultural, community and visitor venues can be developed at this prime location on the west side. The west entrance to the station should include a new public plaza and a wider, more attractive pedestrian railway underpass to balance the sense of arrival at each side of	The Local Plan is underpinned by the Infrastructure Delivery Plan which sets out the necessary infrastructure to support future growth. We have worked with our infrastructure providers both internal and external to understand the requirement. The draft Local Plan includes several site allocations for Hither Green west of the station (around Maythorne Cottages) and sets out objectives to improve the station approach. Hither Green Lane will be re-designated as a Local Centre and it is hoped that this can support its long-	Hither Green Lane re-designated as a new local centre.

			the station. The development of the Library Resource Centre (near to the station, on Hither Green Lane) and the low-rise industrial buildings to its rear on Duncrievie Road could present a further opportunity to develop a cultural and leisure 'quarter' and community facilities here.	term vitality and viability, with support for a wide range of business, community and cultural uses.	
	3	LCA SA 18	Proposed redevelopment of 134 Bromley Road SE6 2QU Having recently been informed of the Lewisham Council's proposal to redevelop the above stated site, I would like to register my rejection to the proposal for the following reasons:- 1. There are already far too many flats in the Lewisham / Catford area. 2. People will eventually require to be re-housed out of flats and into houses to raise families. 3. Flats encourage anonymity and as well as the residents, usually renters, not having as much pride in the upkeep of their dwelling and surrounding area. This is evidenced by social history. 4. Flat owners/ renters are there usually for a given period of time and then move on elsewhere, and therefore are not inclined to set roots in the area and wish to maintain the area as best as could be. 5. There has been much flat construction, and still is ongoing, along the A21 route stretching from Bromley through to Lewisham centre and Loampit Hill. This has caused great concentration of residents along that route. I can understand the benefit to the council of allowing flats to be built as this raises a lot of additional income in the form of Council tax from a given land area, but does little if nothing to increase the quality of life for the residents.	Noted. The allocation of this site has been informed by the London Plan, which directs boroughs to take opportunities enable the redevelopment of out-of-centre retail parks. The Council considers a more optimal use of land could be made at the site, particularly to meet acute needs for housing in the Borough and support the vitality and viability of Lewisham's network of town centres. The London Plan sets a challenging housing target for Lewisham, which the Local Plan must deliver on. The location is considered appropriate for sensitively integrated and higher density development, which is likely to include flats. The site allocation sets out land use principles and development guidelines to help ensure that any future proposal responds positively to the local context.	No change.
	3	LCA SA 18	Lewisham Central Area Re No 18 - Ravensbourne Retail park. It would be fantastic to have access to the waterways behind this site and to be able to walk along it for its entirety. However, much more needs to be done to improve pedestrian access to this retail site. Also to improve the A21 junction at this site which was made worse a few years ago by removing the pedestrian island to cater for large lorries.	Noted. The site allocation makes clear that development proposals will need to deliver public realm enhancements to improve the amenity of and access to the river, along with public realm enhancements along the A21 and other site access points, particularly for walking and cycling.	Ravensbourne Retail Park site allocation amended to reference the River Corridor Improvement Plan SPD.
Lewisham Cyclists	3	LCA SA 18	**Ravensbourne Retail Park;** This site needs to recognise the council transport strategy to deliver the A21 Healthy Streets corridor in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.	Agreed.	Ravensbourne Retail Park site allocation amended to reference the A21 Healthy Streets corridor and no reduction in footway or carriageway.
Quaggy Waterway Action Group	3	LCA SA 18	**Ravensbourne Retail park** Pages 535-537 Site allocation 14.92 Comprehensive mixed-use redevelopment of existing out-of-centre retail park comprising compatible residential, main town centre and commercial uses. Public	Comments are noted. The development requirements already mentions the ecological and amenity value of the river.	Ravensbourne Retail Park site allocation amended by referencing the differing roles of the River Corridor improvement Plan

			realm and environmental enhancements including new public open space and river restoration. Opportunities 14.93 The site is located on Bromley Road which forms part of the A21 corridor. It is currently occupied by an out-of-centre retail park consisting of large format retail buildings and car parking. The River Ravenbourne runs along the site's western boundary. Comprehensive redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land. Rationalising of the retail offer will support the long-term vitality and viability of Catford major town centre, which is located nearby. Re-development will also enable public realm enhancements, including river restoration works and improved access to the River Ravensbourne. 14.94 Development requirements • Development proposals must be delivered in accordance with the A21 Corridor Intensification and Development SPD. • The site must be re-integrated with the surrounding street network to improve access and permeability into and through the site. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors, with direct walking and cycle access to a riverside amenity space. • Positive frontages along Bromley Road and Aitken Road. **• Development must be designed to improve the ecological quality and amenity value of the River Ravensbourne.** • Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including: **• Provision of new public open and/or green space must be integrated into the site, linking to Aitken Road.** **• Public open space along the river** **• Public realm enhancements along Bromley Road to improve the walking and cycle environment.** 14.95 Development guidelines • Development should clearly define the edge of the A21 corridor with a well-integrated building line, including by extending the established building line to the north. • A positive frontage should be established along the south side of Aitken Road to create a 'two sided' street which relates sympathetically to the properties to the north. • Development should be designed so that primary vehicular access is from the A21 and Aitken Road. Opportunities should be explored to align the street network with Barmeston Road to create a contiguous layout, where this would help to improve circulation and not adversely impact on local amenity. • Taller buildings that help with way finding along the A21 corridor may be acceptable, with development stepping up from Bromley Road. Taller elements should be positioned towards the centre of the site to manage and mitigate impacts on amenity, including overshadowing, on the surrounding residential areas.		

			• Part of the site falls within the Culverley Green Conservation Area, which development must respond positively to. • Buffers between the adjoining employment sites will need to be introduced, and where they are existing, enhanced. **These should include elements of green infrastructure wherever feasible.** • Commercial uses that are compatible with existing and new residential properties will be supported in principle. All such provision should complement existing uses at the Bromley Road SIL to reinforce the local node of employment generating activity. • Where main town centre uses are incorporated these should not adversely impact on the town centre network. Development will be expected to achieve a significant reduction in the current amount of retail floorspace, with replacement retail provision focussed on servicing the site and its immediate surrounds. **QWAG Comments:** Improving the ecological quality and amenity value of the River Ravensbourne should be a requirement as stated, not a guideline. It is notable that the reference to the A21 study underplay the important opportunity to refashion the culverted river to play a full role in ecological function, carbon storage, reduced flood risk, improved public amenity, health and other objectives. The next version of the Local Plan should reflect that full potential.		
Lewisham Cyclists	3	LCA SA 20	**Plassy Road Island;** This site needs to recognise the council transport strategy to deliver Healthy Neighbourhoods in order to enable more people to choose to walk and/or cycle. Any development on site should not result in a reduction in existing footway or carriageway space and should seek to reduce overall motor traffic volumes in the area and enable people to choose to walk and cycle between Sangley Road, the Corbett Estate and Catford Town Centre. This should be detailed in the development requirements as part of the public realm strategy and appropriate CIL contributions should be made by developers to facilitate this.	Agreed	Catford Island site allocation amended by referencing the A21 Healthy Streets corridor, improving active travel modes and no reduction in footway and carriageway.
Lewisham Cyclists	3	LCA SA 21	**Laurence House and Civic Centre;** This site needs to recognise the council transport strategy to deliver the A21 Healthy Streets corridor and also East West links along A205 Catford Road in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.	Agreed	Laurence House and Civic Centre sie allocation amended by referencing the A21 Healthy Streets corridor and no reduction in footway and carriageway.
Theatres Trust	3	LCA SA 21	Site Allocation 12: Laurence House and Civic Centre This site allocation seeks retention and enhancement of the Albany, which is welcomed. It also includes new residential use. In principle this could be supported, but there is a need to protect the theatre (and ensure suitable living conditions for occupants) by protecting from future conflict with new residents. We recommend the addition of text highlighting the need to consider the Agent of Change principle. This includes for the theatre's access and servicing needs which may be the bigger risk; it can be	Agreed.	Laurence House and Civic Centre site allocation amended to include reference to the agent of change.

			necessary to transfer equipment and sets in and out of theatres and other performance venues at night and early in the morning due to the requirements of touring shows.		
Theatres Trust	3	LCA SA 21	Site Allocation 21: Laurence House and Civic Centre This site allocation includes the Broadway Theatre. Although there is no suggestion the theatre is at threat and indeed other policies within the plan protect such uses, we would recommend revision of the second bullet point of paragraph 14.107 to make this clear and state: "Provision of a mix of main town centre uses, incorporating civic and cultural uses and retain the Broadway Theatre as a performance facility." Additionally, as per our comments for Site Allocation 12, we suggest there is merit in referencing the Agent of Change principle to protect the operations of the theatre.	Agreed.	Laurence House and Civic Centre site allocation amended by preserving or enhancing the threatre as a performance facility and referring to the agent of change principle.
Lewisham Cyclists	3	LCA SA 22	**Wickes and Halfords, Catford Road;** This site needs to recognise the council transport strategy to deliver the Greenwich to Kent House Cycleway (along the Waterlink way), detailed in the Transport for London Cycling Action Plan , in making sure any development does not result in a reduction in existing footway or shared path space. This should be detailed in the development requirements as part of the public realm strategy for this site, making clear that walking and cycling routes should be clear, direct and wide enough to meet future demands. We refer the council to our Consultation response to the Catford Town Centre Framework.	Agreed	Wickes and Halfords site allocation amended by referencing the Greenwich to Kent House Cycleway and no reduction is footway or carriageway.
Quaggy Waterway Action Group	3	LCA SA 22	**Catford Road, Wickes – Halfords site** Pages 546-7: Opportunities 14.110 Redevelopment will also enable public realm and environmental improvements to be delivered, with key opportunities to **reinstate the River Ravensbourne**. 14.111 Development requirements (include): - Provision of **new public open or green space around the River Ravensbourne, linking to Stansted Road**. - Development proposals must **conserve and seek to enhance green infrastructure**. **QWAG Comments:** There should be a proper assessment of the ecological potential to restore the river and surrounding land rather than viewing this as yet another place to put in bland amenity planting and space of little or no ecological value. QWAG has raised this with Team Catford for some time, but it remains unclear how this has been addressed because artists' impressions of bland green space continue to be used in public engagement exercises without any sense of how these arise from proper ecological assessments. If ecological assessment has been conducted this would be showing up in the design ideas, plans and public communications by now.	The Local Plan is a high level policy document. The Catford Town Centre Framework provides additional level of detail. As the sites come forward the Council will work with developer to ensure the river is re-instated.	No change.

			Current green infrastructure in the area, such as it is, is of low ecological value but it could be transformed to play a significant role in restoration of conditions for nature including of the river corridor, and for public engagement with their local environment and the health, learning and other benefits this can bring. That would require a very different approach than the kind taken with the Catford Green development where it has taken two or more years to get even basic, low biodiversity planting in place and where the minimum has been done to boost nature and to engage the public in what the place would be like. There may also be potential for flood storage and mitigation and both should be explored.		
	3	LCA SA 23	1. Housing: I'd like to register my opposition to the Site Allocation proposal 23: Land at Rushey Green and Bradgate Road (Aldi), on page 549 of the Lewisham Local Plan document. Even though I understand this is not a planning application, I am concerned about the precedent that approving the guidelines outlined in the document would set. Bradgate Road is predominantly a residential street, with 2-storey Victorian houses. I live at number 3, and along with my neighbours at that end of Bradgate Road, would be severely impacted by a high rise being built at the Aldi site. Concerns include lack of light caused by a high rise opposite my home, noise and traffic. Above all, allowing for the construction of high rises in and around the Rushey Green area will negatively change the character of the neighbourhood, bringing it closer to what Lewisham has been transformed to since the aggressive construction drive: a soulless, cheap-looking, impersonal and extremely noise area that is seen as a place pass through and not a destination area. The proposal to build flats above a shop (Aldi or otherwise) also doesn't encourage long-term residents and add to the 'this will do' image that Lewisham has developed over the past few years: people will move here for a few years and live in rental accommodation just long enough until they have enough cash to move out to a more desirable area. Instead, what we long-term Catford residents who live in and love the area would like to see is a neighbourhood that attracts people who want, like us, to invest their lives and bring their families to live here, build business and local connections.	Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site including the existing residential character surrounding the site. The indicative capacity has also been tested through the A21 Development Framework that has been endorsed by the council. Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. Tthe Local Plan acknowledges the potential for this site to accommodate higher density development given the site's high Public Transport Access Level, location within a major centre and London Plan Opportunity Area. Following the Regulation 18 public consultation, additional work will be undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Part 2 Policy QD4 Building Heights. Part 2 of the Local Plan on High Quality Design includes policies to ensure the protection and management of amenity. The site allocation must be read in conjunction with these polices.	Land at Rushey Green and Bradgate Road (Aldi) site allocation amended to remove reference to Rosenthal House as a wayfinding precedent and to make reference to protecting the amenity of surrounding properties. Land at Rushey Green and Bradgate Road (Aldi) site allocation amended by reducing residential to 88 units.
	3	LCA SA 23	3. Green infrastructure: very worried about how many sites have been earmarked for new housing in detriment of green spaces. referring to point 1 of my email, what about converting the Aldi site into green space (a square, community gardens, allotments)? The housing stock	The Local Plan must be demonstrably deliverable. The land is privately owned and unlikely to come forward exclusively for green space. However, new major development would need to provide on-site greening	No change.

			around the south circular is a health hazard for residents who have no option but living there. In addition to your well thought pedestrian and cycling plans, what about increasing green spaces and reducing traffic around that area?	measures and make adequate provision for amenity space and public realm. The Local Plan supports the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and public transport. This will also help to address local issues of poor air quality. The Local Plan sets out details around how this will be delivered in Catford major centre.	
	3	LCA SA 23	Proposed Development at SE6 4JD: I am writing to you to voice my disgust for the development of 119 residential units in what currently is Aldi's car park in Catford. I have lived on Bradgate Road for over 16 years, the area has become congested with shops closing late and a huge increase of vehicles both cars and large goods lorries. The Lewisham Borough is overpopulated already and what used to be a quiet residential street has become a racing car cut through which has increased my daughter's Asthma immensely. I see arguments and physical fights on this road on a weekly basis, my car has been scratched 6 times in the last year from cars squeezing past because they can't be bothered to wait. And now Lewisham Council wants to build 119 flats! Why does Lewisham council have no regard for Lewisham residents and are only interested in making money. The impact of this proposal seems absolutely crazy, I am forced to pay £130 residential parking permit fee of which I can't even park outside my home and now you want to increase traffic by building on a car park that is 100% occupied throughout the day for the Aldi customers. So where does Lewisham council expect people to park? Not only will it increase fuel emissions but will heightened the tension of road users on Bradgate Road. I am deeply hurt by the disregard of Lewisham Council and the fact that nearby residents have not been informed sooner of this proposal. I await your response!	Noted. The Local Plan supports the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and public transport. This will also help to address local issues of poor air quality. Given the site's high Public Transport Access Level (PTAL), it would be expected that development of the site is 'car-free' or 'car-lite' in line with the London Plan parking standards. Local Plan Policy TR5 (Deliveries, servicing and construction) provides that any future development proposal would need to be informed by a satisfactory Delivery and Servicing Plan and/or Construction and Logistics Plan for the commercial and residential elements. Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site including the existing residential character surrounding the site. The indicative capacity has also been tested through the A21 Development Framework that has been endorsed by the council. Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. The Local Plan acknowledges the potential for this site to accommodate higher density development given the site's high Public Transport Access Level, location within a major centre and London Plan Opportunity Area. The public consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement.	Land at Rushey Green and Bradgate Road (Aldi) site allocation amended by reducing residential to 88 units.

	3	LCA SA 23	I'm writing to make my concerns on the specifics of the "Land at Rushey Green and Bradgate Road (Aldi)" site allocation. As a local resident at 13 Bradgate Road, myself and other local residents are directly affected by any such development on the site. 1. Scale and heights I am concerned about the allocation allowing for 119 residential units (I understand is from a calculated formula) based on the size of the whole area of ~ 0.5hectares. If there is a continuation of a supermarket (e.g. Aldi) at the base of a new development, and with a continuation of accompanying car-parking and space for the supermarket customers, I can only envisage that the 119 units could be accommodated vertically above the supermarket? It would be more useful to an average person like myself, to know specifically what the Site Allocation allows in terms on planning applications e.g. an approx. tower of 8, 12, 20 stories? Given your experience of recent local tower block buildings, please can you provide indicative numbers of building scales, sizes and heights? It would be very helpful as a local resident to know, rather than waiting until planning applications come in, as I'm sure you will have a good example either to send me; or use as an indication of possible proposals for scales and heights. Thank you for that. 2. Perspective, overlooking, shadowing Given a lack of clarity above, it is difficult to ascertain the impact of any overlooking or shadowing, but any such development would have a major impact on local Bradgate Road residents. Can you give assurances that there will no negative impact from overlooking and shadows cast from any new development? 3. Precedent concerns I am concerned by the passage on page 550 "Rosenthal House, opposite on the eastern side of Rushey Green, establishes a wayfinding precedent at this end of the town centre, which this site may work in conjunction with to enhance townscape and legibility" Can you explain more by what is meant by this sentence and by "wayfinding precedent" in particular? If I've understood correctly, I think the current Aldi supermarket is already a wayfinding precedent in some respects; but I think this passage points to an assumption of a tower block on the scale of Rosenthal House; and as such reveals what would already be an acceptable proposal to be granted planning permission. I think this is of real concern, that the document indicates the sort of planning applications that would be expected for the allocated site. Can you confirm what is meant by the term wayfinding precedent, and if you can allay my fears of an equal or greater tower to face Rosenthal House on the opposite side? 4. Traffic	Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site including the existing residential character surrounding the site. The indicative capacity has also been tested through the A21 Development Framework that has been endorsed by the council. Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. The Local Plan acknowledges the potential for this site to accommodate higher density development given the site's high Public Transport Access Level, location within a major centre and London Plan Opportunity Area. Following the Regulation 18 public consultation, additional work will be undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Part 2 Policy QD4 Building Heights. It is agreed that reference to Rosenthal House as a wayfinding precedent should be removed. Part 2 of the Local Plan on High Quality Design includes policies to ensure the protection and management of amenity. The site allocation must be read in conjunction with these polices. The Local Plan supports the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and public transport. This will also help to address local issues of poor air quality. Given the site's high Public Transport Access Level (PTAL), it would be expected that development of the site is 'car-free' or 'car-lite' in line with the London Plan parking standards. Local Plan Policy TR5 (Deliveries, servicing and construction) provides that any future development proposal would need to be informed by a satisfactory Delivery and Servicing Plan and/or Construction and Logistics Plan for the commercial and residential elements.	Land at Rushey Green and Bradgate Road (Aldi) site allocation amended to remove reference to Rosenthal House as a wayfinding precedent and to make reference to protecting the amenity of surrounding properties. Land at Rushey Green and Bradgate Road (Aldi) site allocation amended by reducing residential to 88 units.

			Another element/concern for 119 units in an already busy residential street is the number of extra cars and predicted road traffic that such a development would bring. As a resident of Bradgate Road for over 7 years, I have witnessed consistent traffic issues on our street, particularly at weekends with the numbers of people accessing the supermarket or parking locally for the supermarket, shops, churches and other local facilities. The stand-offs, confrontations and fighting, with resulting road blockages, and then increased speeds of traffic when access in one direction becomes free - not taking into account the consistent damage and dents to locally parked cars (I estimate my car must have been damaged 10-15 times) - would only become more focussed in the resulting extra traffic. Given that Bradgate Road is essentially housed by quiet respectable local residents, to increase these external factors on our street is a major concern.		
	3	LCA SA 23	Our response to the notional proposal of the current Aldi site being re-purposed with a possible “tower” being built opposite Rosenthal House with one of the reasons being that it is viewed as being a visual marker for Catford town centre is concerning. We live at No 6 Bradgate Road and already have to cope with the ingress and egress of Aldi customers as our house backs on to the car park. We have to tolerate a lot of traffic going up and down the road, rubbish and general disturbance. This impacts on the quality of life and has done for a number of years. It seems because Rosenthal House sits on Rushey Green that the council takes the view that it sets a precedent for a “twin” tower build on the opposite side of the road on top of Aldi for 119 residential units. We do not want to be overlooked by a tower as it will take away our privacy. There is potential for light to be blocked and shade to be cast across residents’ gardens as the sun moves from east to west. The description of where Aldi sits on Rushey Green meeting the Public Realm seems to indicate that it needs to be “opened up”. What does this mean exactly? Is this a way in to build other commercial units or is it where the residents of the 119 units will enter the building and if they have vehicles where will they be parked? With Aldi we have for several years experienced an impact on our quality of life and if there is a tower built above Aldi we believe that our quality of life will be further eroded. This site does not have any further capacity without negatively impacting on the residents who already live here. Amenities are already strained, for example, the Novum NHS surgery. At the moment residential flats are being built across Rushey Green where the DSS offices were near to Tesco Express. This is increasing the density of residents, so to add another 119 units, which presumably will not be 119 individuals but possibly minimum 2 per unit is pushing the amenities even further beyond the limit. The consultation description identifies Bradgate Road as being part of the Catford town centre area there appears	Following the Regulation 18 public consultation, additional work will be undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Part 2 Policy QD4 Building Heights. It is agreed that reference to Rosenthal House as a wayfinding precedent should be removed. Given the site’s high Public Transport Access Level (PTAL), it would be expected that development of the site is ‘car-free’ or ‘car-lite’ in line with the London Plan parking standards. Local Plan Policy TR5 (Deliveries, servicing and construction) provides that any future development proposal would need to be informed by a satisfactory Delivery and Servicing Plan and/or Construction and Logistics Plan for the commercial and residential elements. An Infrastructure Delivery Plan (IDP) has been prepared alongside the Local Plan. This sets out infrastructure required to support the growth planned in the borough. Part 4 of the Local Plan sets out how new development must contribute to securing the delivery of infrastructure. The site is located within the town centre boundary within the adopted Local Plan, and this boundary will be carried forward in the new plan. The site allocation development guidelines state that development proposals must respond to the residential scale and character of properties on Bradgate Road.	Land at Rushey Green and Bradgate Road (Aldi) site allocation amended to remove reference to Rosenthal House as a wayfinding precedent and to make reference to protecting the amenity of surrounding properties. Land at Rushey Green and Bradgate Road (Aldi) site allocation amended to recognise the established residential area surrounding the site.

			to be no recognition that Bradgate Road and the surrounding roads is an established residential area. The current shopping centre is not adjacent to us but 10 minutes' walk so we reject the notion that Bradgate Road is on the north boundary of the town centre area.		
	3	LCA SA 23	4. I am incredibly concerned about the idea of a high rise building on the site of the Aldi car park, just off Bradgate Road. I simply cannot see how this is possible and why it has even been put forward as a tentative idea as this stage. The current site is the location of a car park that is currently well used by residents of a supermarket. A high rise development in this location would also change the fabric of this area and impact adversely on a densely populated, but low rise area.	Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site including the existing residential character surrounding the site. The indicative capacity has also been tested through the A21 Development Framework that has been endorsed by the council. ~~.~~Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. The Local Plan acknowledges the potential for this site to accommodate higher density development given the site's high Public Transport Access Level, location within a major centre and London Plan Opportunity Area. Following the Regulation 18 public consultation, additional work will be undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Part 2 Policy QD4 Building Heights. Part 2 of the Local Plan on High Quality Design includes policies to ensure the protection and management of amenity. The site allocation must be read in conjunction with these polices.	Land at Rushey Green and Bradgate Road (Aldi) site allocation amended by reducing residential to 88 units.
	3	LCA SA 23	As a resident of Bradgate Road backing onto Catford Aldi, I am deeply concerned about the Lewisham local plan to potentially allow high density housing on the site of Aldi carpark. The would cause a significant, material impact to myself and other residents, due to the concerns below: Loss of Privacy (both bedroom and kitchen face directly onto the site in question) Loss of day light (the site is directly to the south of my kitchen and bedroom). Any 'high rise' development would completely block the natural light. Traffic (Bradgate Road is already a rat run for drivers to avoid the South circular - the building of high density housing immediately to the south would only make this worse.	Noted. Part 2 of the Local Plan on High Quality Design includes policies to ensure the protection and management of amenity. The site allocation must be read in conjunction with these polices. Given the site's high Public Transport Access Level (PTAL), it would be expected that development of the site is 'car-free' or 'car-lite' in line with the London Plan parking standards. Local Plan Policy TR5 (Deliveries, servicing and construction) provides that any future development proposal would need to be informed by a satisfactory Delivery and Servicing Plan and/or Construction and Logistics Plan for the commercial and residential elements. However it is recognised that some	Local Plan amended with additional policy on 'considerate construction' to help protect local amenity.

			Construction disturbance - as the site backs directly onto the gardens of Bradgate Road there will be significant noise and disruption caused by large scale building works.	additional support for the use of the 'consideration construction' scheme could be included in the plan.	
	3	LCA SA 23	I am emailing to formally record my strong objection to the local plan's site allocation for land at Rushey Green and Bradgate Road. The potential development of 119 residential units is massively disproportionate to the size of the land available, would be a very high building surrounded by small Victorian terraced houses so completely out of scale to the surrounds, greatly increase traffic along Bradgate Road and put massive strain on local services which are already oversubscribed (for example it is very difficult to get an appointment at the local doctor's surgery Rushey Green Group Practice). This planning documents seem to suggest this is a town centre area - it is not. It is a very residential area and I strongly reject the idea of using Rosendale House which is set back on Rosental Road as a wayfinding template. A high rise development would have a hugely adverse affect on our home in terms of shade, noise, potential for being overlooked (we live at 5 Bradgate Road) as well as on the wider local, residential area. Already having Aldi car park entrance on Bradgate road which is a residential street and the recent closure of surrounding roads to incoming traffic has already had a terrible affect on levels of traffic on Bradgate Road which is used by many, many children and families attending Holbeach School. Litter is another persistent problem which would be likely to increase with this proposal. Any future residential development at the site should be restricted to 2-storey in line with the vast majority of the surrounding residential buildings and clearly residential location. The car entrance to Aldi should be relocated on the main Rushey Green Road, and/or the first section of Bradgate Road should be closed to traffic beyond the car park entrance.	Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site including the existing residential character surrounding the site. The indicative capacity has also been tested through the A21 Development Framework that has been endorsed by the council. ~~.~~Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. The Local Plan acknowledges the potential for this site to accommodate higher density development given the site's high Public Transport Access Level, location within a major centre and London Plan Opportunity Area. Following the Regulation 18 public consultation, additional work will be undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Part 2 Policy QD4 Building Heights. Part 2 of the Local Plan on High Quality Design includes policies to ensure the protection and management of amenity. The site allocation must be read in conjunction with these polices. Entrance to the site will be assessed through the pre-application process and within the required Transport Assessment when the scheme comes forward.	Land at Rushey Green and Bradgate Road (Aldi) site allocation amended by reducing residential to 88 units.
Lewisham Cyclists	3	LCA SA 23	**Land at Rushey Green and Bradgate Road (Aldi)**; This site needs to recognise the council transport strategy to deliver the A21 Healthy Streets corridor in making sure any development does not result in a reduction in existing footway or carriageway space. This site also needs to recognise the council transport strategy to deliver Healthy Neighbourhoods in order to enable more people to choose to walk and/or cycle. This should be detailed in the development requirements as part of the public realm strategy.	Agreed.	Land at Rushey Green and Bradgate Road (Aldi) site allocation amended by referring to the A21 Healthy Streets corridor and no reduction in footway or carriageway.
Wildfell Road Residents Association	3	LCA SA 23	On reviewing your publication, Lewisham Local Plan 'An Open Lewisham as part of an Open London: Regulation 18 stage "Main Issues and Preferred Approaches" document	Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more	Land at Rushey Green and Bradgate Road (Aldi) site allocation amended to refer to the concentration of uses, including for night-time economic activities

			January 2021 our association would like to comment on behalf of our residents. While the great majority of the medium / long term plan for Lewisham has been welcomed positively by our local community there is one particular area of concern in the document mentioned above that has been brought to our attention. This is namely item 23 “Land at Rushey Green and Bradgate Road (Aldi)” located on page 547 – 548, LCA, Part 3 of the document. For clarity we have attached a pdf copy to this email. *Officer note: Site allocation LCA Site 23 included as attachment.* Our concerns can be summarised in three points. · The size / capacity of the proposed redevelopment. · Mention of a ‘night-time economy hub’. · The lack of account for properties bordering the site from Wildfell road. <u>Redevelopment capacity</u> While we collectively understand the need to use space more effectively and efficiently across the borough, residents are concerned by the proposed redevelopment of this site. As stated in your document the ‘indicative development capacity’ is recommended to include 119 residential units in addition to 4,100 meters squared of main town centre space. The southerly most section of this site backs onto the gardens of house numbers 6, 8, 10, 12, 14, 16, 18, and 20 on Wildfell road. Residents living in these properties and in the wider immediate area are worried about how redevelopment of this site could affect the outlook from the back of their homes and increase noise pollution in the area. This anxiety is based on the large number of units you propose to allocate to a site of this modest size leading many to assume that any development will need to be multi storey. Currently the land is used as a low level car park so we are asking for your assurances that any further development on this site will be limited so as to not affect the right to privacy or light currently enjoyed at the aforementioned properties in any way. <u>Mention of a ‘night-time economy hub’</u> In the ‘planning designations and site considerations section’ of your document the site is labelled as a ‘night-time economy hub’. Several late night take-away’s, bars, restaurants and other late night businesses already populate the immediate area around Rushey Green. Residents already consider the noise and disruption caused at unsociable hours by these places to be a nuisance. Therefore it is the overwhelming view of residents that there is no need for any additional participants in what is already regarded as a saturated sector. Can you commit to	details can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site including the existing residential character surrounding the site. The indicative capacity has also been tested through the A21 Development Framework that has been endorsed by the council. ~~.~~Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. The Local Plan acknowledges the potential for this site to accommodate higher density development given the site’s high Public Transport Access Level, location within a major centre and London Plan Opportunity Area. Following the Regulation 18 public consultation, additional work will be undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Part 2 Policy QD4 Building Heights. Given the site’s high Public Transport Access Level (PTAL), it would be expected that development of the site is ‘car-free’ or ‘car-lite’ in line with the London Plan parking standards. The Local Plan sets out priority locations for night-time economic activities, recognising the role they play in supporting local economy and cultural activities. However, it is recognised that further clarity is required to ensure controls for concentration of certain types of uses and need for protection of amenity. Part 2 of the Local Plan on High Quality Design includes policies to ensure the protection and management of amenity. The site allocation must be read in conjunction with these polices. However it is acknowledged that the Wildfell Road properties should be referred in the development guidelines.	Land at Rushey Green and Bradgate Road (Aldi) site allocation amended to refer that development must protect surrounding amenity including the properties on Wildfell Road. Land at Rushey Green and Bradgate Road (Aldi) site allocation allocation amended by reducing residential to 88 units.

			controls that will limit noise and operating hours of any new businesses in this proposed development so as to ensure that there is no further disruption to residents? <u>The lack of account for properties bordering the site from Wildfell road.</u> We notice that in your development guidelines that properties located on both Patrol Place and Bradgate Road are taken into account. There is no mention of Wildfell Road which, as mentioned above, also borders the site. Residents on Wildfell Road who might be affected by this development would also like to be taken into account specifically. Many thanks in advance for reading our concerns, we recognise that this is not a planning application but a consultation and look forward to any feedback you can give us. In addition we look forward to working with you in the shared endeavour of making Catford a better place for residents and those who visit.		
	3	LCA SA 23	We wanted to get in touch to highlight some concerns we have regarding the proposed Lewisham Local Plan - specifically the below site allocation in the Central Area: 23 - Land at Rushey Green / Bradgate Rd We are residents of number 1 Bradgate Road, Catford and live directly opposite the site in question and the current entrance to Aldi. Our feedback/concerns with the proposal are as detailed below: 1. Traffic Traffic, parking and air pollution on Bradgate Rd is already a big issue. To implement the plan as suggested, it is assumed a large section of the existing Supermarket car park will be lost, resulting in customers looking for parking opportunities on overly populated residential streets close by. In addition, Bradgate Road and surrounding streets will also need to absorb parking for up to 119 additional car owners. Space for supermarket deliveries to take place within the allocated plot of land should be a consideration. I can testify that they are early, frequent and loud so for quality of life for residents (existing and new) I would flag that these should not occur any closer to residential premises than they already do (1-6 Bradgate Rd to Aldi Load-In Shutters). 2. Precedent of Rosenthal House / High Rise Buildings Rosenthal House as a precedent is concerning for a number of reasons - whilst I appreciate the proposal is not to replicate, this building stands out locally for being high-rise and is run down, dilapidated and an eye sore. I question the quality of the housing for the people who live in this block and the whole site attracts fly tipping and sub-standard community space. If this is being touted as the	Noted. The Local Plan supports the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and public transport. This will also help to address local issues of poor air quality. Local Plan Policy TR5 (Deliveries, servicing and construction) provides that any future development proposal would need to be informed by a satisfactory Delivery and Servicing Plan and/or Construction and Logistics Plan for the commercial and residential elements. This will help to ensure protection of amenity. However it is recognised that some additional support for the use of the 'consideration construction' scheme could be included in the plan. Given the site's high Public Transport Access Level (PTAL), it would be expected that development is 'car-free' or 'car-lite' in line with the London Plan parking standards. Following the Regulation 18 public consultation, additional work will be undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Part 2 policy QD4 Building Heights. It is agreed that reference to Rosenthal House as a wayfinding precedent should be removed. An Infrastructure Delivery Plan (IDP) has been prepared alongside the Local Plan. This sets out infrastructure required to support the growth planned in the borough. Part 4 of the Local Plan sets out how new development must contribute to securing the delivery of infrastructure.	Land at Rushey Green and Bradgate Road (Aldi) site allocation amended to remove reference to Rosenthal House as a wayfinding precedent and to make to reference the amenity of surrounding properties. Local Plan amended with additional policy on 'considerate construction' to help protect local amenity

			'welcome and way finding' point as you enter Catford I would hope that funds for development are being prioritised into making this a site for quality housing and establishing a positive commercial/community presence on Rushey Green. Reconfigured, this site could produce a fantastic opportunity for regeneration, producing a greater volume of better quality of housing as you enter Catford. In conjunction, a lower-rise configuration (2-3 storeys) could be considered on the opposite Rushey Green / Bradgate Rd site to compliment this gateway to Catford. I don't feel Rosenthal House's height and location alone justifies a replica on the corner of Bradgate Rd and Rushey Green. 3. Impact of building on site Living so close to the proposed development site raises the obvious personal concerns for us and our neighbours - years of loud, noisy and dusty construction work will inevitably have an impact on our day to day quality of life and the value and desirability of our properties should we wish to move on during the construction period. Personally, we receive very little sunlight in the garden due to office block we sit next to, so we have undergone building work to open up our house to maximise sun from the front of our property. If a high rise block exceeding the height of existing buildings on the street is developed, we will lose light into our home which is of great concern. 4. Additional residents Additional residential units need to be reflected by local amenities and reflect the ever-growing number of people living in that community to make the area an enjoyable and practical place to live. I'm sure this is key in your planning, but since we moved here 5 years ago, we have attended a doctors surgery in Ladywell/Brockley since the Rushey Green Group Practice that backs onto our house is oversubscribed and getting an appointment was challenging to say the least. Additionally, we have applied for a bicycle rack spot in on both Medusa Rd and Brookdale Rd in this past year, as well as applying (as part of the street) for a dedicated Bradgate Rd bike storage unit of which we have heard nothing. With 119 additional homes, this requirement grows again. When the council and local services seem to be struggling with current resident requirements, it's hard to not be concerned about further stretching resources. As much as we support new homes, it has to be in the right areas where residents already feel supported by their councils and quality of life and resources can be maintained for residents old and new. We are supportive of and understand the plans to refocus the entrance to the commercial premises on this land to be Rushey Green facing.		
	3	LCA SA 23	I understand and acknowledge the clear opportunity to intensify this site, and bring much needed housing. I am also very concerned that there isn't a stronger statement and underlying commitment to enforce	Noted. Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper	Land at Rushey Green and Bradgate Road (Aldi) site allocation amended to refer to Policy QD10 and to make reference to protecting the amenity of the surrounding properties.

			proposed policy QD11 Infill and backland sites, back gardens and amenity areas specifically: *"Do not result in harmful overshadowing or overlooking, or otherwise adversely impact on the amenity of neighbouring properties, including their rear gardens, or the occupiers of the development, having regard to other Local Plan policies"* There is a poor precedent from 17 Scrooby street in allowing this to occur and more needs to be done to balance the clear opportunity to improve and better utilise the Aldi site, with protecting the amenity and privacy of the existing homes and gardens. This is a really good opportunity to get something right, but could go horribly wrong if mis-handled. There is also a real need to improve traffic flow on Bradgate Road, which is currently dangerous due to two-way aggression and mishaps (everyone has dents in their cars) and used as a rat run to avoid the Catford Town Centre, which will get much worse during any regen and relocation of the south circular. This will bring the illegally bad air quality from the A21 into a deeply residential area, and make it more dangerous for pedestrians and cyclist, especially important given the location of the Holbeach primary school on this road. Children and parents should be able to walk and cycle safely to school every day, free from aggressive speeding drivers and the pollution they bring. I would strongly urge consideration of how to use the Aldi site corner development to not only sensitively create density without infringing on the amenity of existing residents, but also to improve the traffic situation, ideally closing the road to entry from the A21 and making it one way (west only). This could be done by redesigning the access to the Aldi to be direct off the A21 rather than imposing large lorries on what is otherwise a small scale and heritage residential road. There is huge support locally for improving the road safety and pollution levels on Bradgate road and the surrounding area, particularly with reference to the school. This would be a really important opportunity to make an otherwise highly resisted and unpopular development much more acceptable to local people.	Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site including the existing residential character surrounding the site. The indicative capacity has also been tested through the A21 Development Framework that has been endorsed by the council. ~~,~~Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. Road closures are outside the scope of the Local Plan.	Land at Rushey Green and Bradgate Road (Aldi) site allocation amended by reducing residential to 88 units.
	3	LCA SA 24	Proposed Site - House on the Hill - Slaithwaite Rd - SE13 6DL We wish to refer to the Local Planning Application in respect of the above mentioned property at 47 Slaithwaite Road, Lewisham, SE13 6DL. We are local residents and have just been made aware of a proposal to redevelop the above site as part of the Lewisham Local Plan. The scheme does not appear to be	Noted. The public consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement. The site is in a highly accessible area, within the borough's opportunity area and is suitable for redevelopment.	House on the Hill site allocation amended by increasing residential to 52 units.

			listed on the Authority's official webpages ending – commonplace or local plan consultation – but as displayed on a rather weather beaten single sided A4 sized notice, attached to a lamppost on the pavement at the tradesmen's side of the property. This means that hardly any local residents will be aware of this submission. Covid lockdown will have also prevented a wider discussion. The consultation period mentioned on this single A4 sheet appears to have begun on the 15th January of this year and is stated to end on the 11th April. The document proposes that 36 residential units should be built on this site. We request that the present purpose built centre be retained, refurbished and direct discussions immediately started, with all neighbouring residents, for the future use of the site. Our suggestions for a detailed consultation are based upon the following;- 1. Consideration be given to the present building being used by the local community or perhaps adapted for a national charity/ refugee accommodation. 2. Proposed change to 36 residential units would alter present single storey building, surrounded by trees and garden, into a multi storey concrete infilled site. This will add to population density and impact upon a local environment and associated services, already under stress caused by littering and illegal dumping of household waste. 3. There would be an increase in road traffic up and down Slaithwaite and Lingards Roads, and added pressure in respect of public parking space at the Library car park. This would be in addition to the recent construction of a 127 room Travel Lodge hotel at the Slaithwaite Rd- A21 Lewisham/Catford Rd junction where there is no extra car parking provision. It should be noted that the residents along both Slaithwaite, Lingards, Clarendon Rise and Limes Grove roads have not enjoyed the benefits of a quieter traffic or pollution free life during Covid lockdown, as a result of the recent Council LTN/ GLC traffic reduction policies – all these roads have clear and unhindered access. More residential units in this area of Lewisham will mean added traffic noise and pollution, generated by both private cars and commercial delivery vehicles. 4. Will this project lead to the provision of much needed additional medical, educational and social services? Will the sanctioning of the scheme add to the basket cases of empty unaffordable properties littering this area? Is the redevelopment going to impinge upon stretched utility services in the area? The interrelationship of these questions, and any meaningful answers, come under scrutiny when observing the relentless construction of high rise flats, clustered as empty forbidding megaliths in the town centre, serving as sad monuments to the cult of profit, regardless of a green and spacious low rise environment which could be welcoming to us all.	Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. The indicative capacity has been tested through the A21 Development Framework that has been endorsed by the council. Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. The development will be car-free or car-lite in accordance with London Plan policies.	
	3	LCA SA 24	Proposed house on the hill at Slaithewaite Road I was very disappointed to see this proposed development. This is already a high density neighbourhood (I live in Limes	Objections noted. However the site is in a highly accessible area, within the borough's opportunity area and is suitable for redevelopment.	House on the Hill site allocation amended by increasing residential to 52 units.

			Grove) and there is a hotel being built at the bottom of Slaithewaite Road. In other areas of policy, Lewisham is trying to reduce traffic to roads like this but both of these development will have the opposite effect and increase traffic and air pollution. There must be alternative uses for the existing building or how about a new public space!!!. This is a fairly quiet area close to the centre of Lewisham. I would prefer to see it stay that way rather than fill up every possible square inch with new building.	Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. The indicative capacity has been tested through the A21 Development Framework that has been endorsed by the council. Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach.	
	3	LCA SA 24	47 Slaithwaite Road I am against the proposal to build 36 residential units on the site of 47 Slaithwaite Road. I do not think it is a suitable use of this space. It would mean the loss of a purpose built institutional building that was planned for community use. It would also change the character and environment of the area which is currently low rise with many mature trees. The additional pressure on parking, and local provision of doctors etc. will have a detrimental impact on quality of people's lives in our community and will see an increase in traffic and pollution. It's really not the right place for such a development, especially given the new hotel being built at the other end of that road. Given lockdown I have only just seen this proposal on the small notice on the nearby lamppost, so I think it might be a good idea if you also extend the consultation period so that the community is given a fair chance at their say about this.	Objections noted. However the site is in a highly accessible area, within the borough's opportunity area and is suitable for redevelopment. Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. The indicative capacity has been tested through the A21 Development Framework that has been endorsed by the council. Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. The consultation was carried out in accordance with our Statement of Community Involvement.	House on the Hill site allocation amended by increasing residential to 52 units.
	3	LCA SA 24	I am writing regarding the proposed development at No.47, Slaithwaite Road, Lewisham. I understand there is a proposal to develop 36 residential units on the site, which seems poorly considered. This is a purpose built building that is supposed to be for COMMUNITY USE. Something that the area could massively benefit from and now more than ever, this should be an integral part of rebuilding Lewisham. I feel very proud to be a part of lewisham's community and at a time the government is failing to offer the financial support we need to really thrive and reducing funding to the borough, we must protect the few spaces that do matter. There is so much that could be done with the space and if there is a way for me to get involved in doing so, please	Noted. The site is in current use as a residential institution (supported accommodation). The site allocation development requirements make clear that any future development would need to ensure appropriate re-provision of this type of housing, in line with other Local Plan policies.	No change.

			could you advise me how to do so? I currently volunteer for a community garden in Peckham and we have just secured a £10,000 grant from the Mayor of London's Make London fund, which is one of many things that could be done to get this space off the ground too. Aside from destroying a genuine community space, I also don't think due consideration has been given to more practical issues. Parking, access to GPs, schools, increased traffic etc. What price point would said units go on the market at? Would the price align with the average income for the area, making them affordable to locals and young people who wish to remain in the borough and serve it with their skills? I feel that this is being considered purely from a financial perspective and not with the community in mind and hope that you will consider alternatives for what could be a real asset to the community, given the right investment and focus.		
	3	LCA SA 24	HOUSE ON THE HILL SITE PROPOSAL. We are pleased to have an opportunity to comment on the Local Plan for Lewisham, specifically on the proposed site allocation and possible development of the House On The Hill site - 47 Slaithwaite Road. Although we would support more affordable/social housing, most new developments in Lewisham currently **do not** eventually result in delivering this for a variety of reasons. The notice suggests that the site may be used for 36 mixed residential units. What does that mean? Are these all affordable? There is already high density housing in this area, with many apparent unregistered HMO'S, and numerous problems relating to very high air pollution, high levels of traffic and fly-tipping. The objections we have to this space being developed for housing include: 1) **Increased Air Pollution.** The area suffers from a **very high level of toxic air pollution**. This improved significantly when **local residents** campaigned for the gated closure where Clarendon Rise meets Bonfield Road. However, further efforts are required to improve this further, as a combination of inadequate signage and lack of enforcement means traffic still heavily uses the road, in an attempt to access the Lee High Road or find parking space. Introducing new housing to this area will add to this serious air pollution issue. In addition there will soon be a new Travel Lodge and Church at the bottom of the road, both of which have no apparent parking facilities. It is	Any new development for the site would be assessed against our affordable housing policy which seeks a 50% affordable strategic target across all sites. The site is in a highly accessible area, within the borough's opportunity area and is suitable for redevelopment. Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. The indicative capacity has been tested through the A21 Development Framework that has been endorsed by the council. ₋Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. The development will be car-free or car-lite in accordance with London Plan policies. The Council is preparaing an Air Quality Action Plan for further details please see the Councils website. For further details on the Councils LTN shemes please see the Councils website. Lewisham like all London boroughs is tackling a housing crisis and needs to build more homes. At the	House on the Hill site allocation amended by increasing residential to 52 units.

			predicted that this will bring even more non residential traffic into this area, and exacerbate the traffic pollution issues. This area has a large diverse community. When nine-year-old Ella Kissi-Debrah, from this area of Lewisham, became the first person to have air pollution listed as a cause of death, it sent the stark message that people living in poorer urban. areas and minority groups are especially at risk of the dangers of increased carbon emissions. If **even more** cars and construction work are introduced to this area, this will clearly have a negative impact on air pollution levels. How will the Council monitor and act on any increase in the air pollution levels, or enforce any increased traffic reduction initiatives? Additionally better, clearer, signage is required, particularly on the right hand turning from Lingards Road onto Slaithwaite Road to reduce current levels of non residential traffic which impacts on the air quality of the area. Recent attempts to introduce LTN's in this area (Dermody Road) were very disappointing. Too often the local public support for the measures are overshadowed by a small group of more vocal opponents. It is noticeable in Lewisham that the location of the more child and family friendly parks with better amenities, and LTN's are disproportionately benefitting the wealthier postcodes. Traffic and the consequent pollution have been shifted onto displacement routes with less affluent communities. The inherent unfairness of this is highly divisive. Any possible development of the House on the Hill site should consider that this area is very central, ringed by major highly polluted roads carrying displaced traffic. The area has been sorely neglected in terms of air quality and environmental improvements in recent years. Rather than build on this area can the site be used to plant additional trees, to help improve air quality, as part of the Mayor of London's tree planting scheme? 2) **Need for more Green Space in Central Lewisham.** The House on the Hill has a lot of old and established trees and potentially is a rare green space in this central Lewisham area. Can it not be redeveloped as a community garden, park or allotments e.g. for AFRIL? The Mayor of London is committed to **preserving** and increasing our tree canopy. This site seems ideal to develop into a vibrant green space for local residents, in this highly polluted urban area.	same time we acknowledge the importance of open space and oue green infrastructure. The Local Plan and the policies that underpin our spatial strategy is trying to deal with these two issues. The Local Plan is accompanied by the Infrastructure Delivery Plan – also part of the consultation which sets out the necessary infrastructure such a school places, health care facilities etc to accommodate growth. Any proposal coming forward for planning will be accomopanied by a transport assessment and construction plan to minimise disruption during the construction stage. The consultation was carried out in accordance with our Statement of Community Involvement.	

			Green infrastructure is just as important to Lewisham as its grey infrastructure. Enabling multiple green spaces promotes healthier living, providing spaces for physical activity and improves mental health. Green spaces filter pollutants to improve air and water quality, they facilitate clean, comfortable and more attractive streets and encourage walking and cycling. All very much needed in this area. Every time a new development is proposed in central Lewisham it is accompanied by uplifting architectural pictures of additional green spaces for the residents. These have very rarely materialised. The Gateway development is a prime example of this. Social demand for urban green space is getting stronger, post pandemic, and any opportunity to retain/expand these sites needs to be grasped. 3) **Additional Services Required.** Already there is an inadequate provision of GP, Dentists, School services etc. in central Lewisham. If there is a further increase in residents, are these services set to expand? What actions/interventions are being/will be made to address this? 4) **Building work introducing more noise and pollution.** Construction activities are a large contributor to air pollution. The House on the Hill site is surrounded by housing on all sides, and the residents will be subjected to **even more** pollution than normal! The level of dust and noise generated during land clearance and demolition alone, will have a massive impact on local residents. As we are currently **already experiencing high levels of air pollution in this area from vehicle emissions**, additional pollution caused by building work and plant machinery would undoubtedly have health consequences for all of us living in this area. 5) **Notification of proposed work:** Lastly, the way this proposal was advertised is very concerning. One A4 notice attached to a lamppost is not the most effective way of communicating proposed works to the wider community. Most local people would not see this in the midst of a lockdown! Most residents are currently **unaware** of this proposal and its implications. If the assumption is that communication takes place online, the Council are excluding a lot of local		

			residents from the conversation, and a greater effort to be more inclusive should be made. In summary, we are incredibly disappointed to see the proposal to build housing on the footprint of the House On The Hill. During the pandemic local residents have come to really appreciate local green spaces, and in central Lewisham they are desperately needed to improve our poor air quality. Investing in urban public green spaces brings many health and social benefits. As residents we are already concerned about toxic air, and wonder what is being done about reducing it in this particular area? We hope to be given the opportunity to work with the Council, to shape and attempt to make a positive impact on our environment. Regrettably, at the moment the excessive levels of pollution in this area are already very worrying, and any further building and lack of initiatives to reduce traffic emissions, leave us feeling very anxious about the potentially lethal health impacts on residents. This proposal does not appear to have the best interests of our community in mind.		
	3	LCA SA 24	We would like to raise concerns regarding the inclusion of 47 Slaithwaite road i.e. the "House on the Hill" as a site for residential development. The Lewisham Local Plan suggests that this former community centre currently being used as an overnight respite centre will be developed into 36 residential flats (see pages 551-2 of the Plan). Introduction of 36 new flats will significantly increase the strain on local amenities in the area. At its most basic, issues such as parking and traffic will significantly increase on Slaithwaite and the adjoining roads, as well as broader services such as access to doctor surgeries, transport etc. Some of these amenities are already negatively impacted by the introduction of a new hotel at the end of the road without additional services to support those staying there. Further, the potential loss of the site as a community space including short-term residential stays could negatively impact the provision services for the most vulnerable in the Lewisham community. The Plan notes that development should be in accordance with Policy HO7 Supported Housing, but does not appear to describe how this Policy is met (and apologies if we have missed this detail). For example, it is not clear that the "existing provision is no longer required or that adequate 106 replacement provision will be secured" nor that "the existing facility is not suitable to support the intended occupants in its current condition or is incapable of being maintained at an acceptable modern standard". In our view, a better use of this site, would be to continue its use as a community building (refurbished or redesigned if necessary to accommodate a variety of community	Objection noted. However the site is in a highly accessible area, within the borough's opportunity area and is suitable for redevelopment. Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. The indicative capacity has been tested through the A21 Development Framework that has been endorsed by the council. ~~-~~Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. The development will be car-free or car-lite in accordance with London Plan policies. The site is in current use as a residential institution (supported accommodation). The site allocation development requirements make clear that any future development would need to ensure appropriate re-provision of this type of housing, in line with other Local Plan policies.	House on the Hill site allocation amended by increasing residential to 52 units.

			purposes) and to continue the provision of short-term stays for vulnerable residents.		
	3	LCA SA 24	**Objection to proposal for House on the Hill 47 Slaithwaite Road** I am emailing you directly as it seems impossible to find the right place to register my objections on your commonplace website. I am extremely concerned at your proposal to develop the above site into "36 residential units" as I do not think this is at all a suitable use of the site. It currently consists of a single storey building surrounded by garden – mature trees, grass and flowers and was previously used as a community resource for disabled and vulnerable children. A community resource like this should not be mindlessly turned into yet more pokey little residential units of which Lewisham is currently overrun. There must be hundreds or possibly a thousand or more of these in the recent and continuing excessively high rise developments in the town centre. The Slaithwaite Road/Clarendon Rise corner is not a suitable place to put more of these inappropriate "units". More housing, especially of this densely packed type, would only lead to higher demand on already overstretched resources – parking and transport, doctors, dentists, schools and the hospital. I cannot imagine you are making any more provision for any of these services in your excessive rush to overdevelop Lewisham. There is already nearing completion a cheap 127-room hotel at the bottom of Slaithwaite Road with no extra parking provision. We do not want 36 more "residential units" at the top end as well. I would propose that a single or at most double storey community facility is a much better use of the site. In any case, you should absolutely not be forcing more change on the residents of the local area (LTN anybody?) without proper consultation of the residents affected, i.e. those in Clarendon Rise, Slaithwaite Road and Limes Grove. Putting up a tiny notice on a tree outside the site does not constitute meaningful consultation (why not a door drop of the area?) and as I said at the top, it's impossible to find the relevant section in your commonplace consultation. Stop trampling on and ignoring residents and do a proper consultation.	The site is in a highly accessible area, within the borough's opportunity area and is suitable for redevelopment. Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. The indicative capacity has been tested through the A21 Development Framework that has been endorsed by the council. ~~-~~Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. The development will be car-free or car-lite in accordance with London Plan policies. Details on LTNs can be found on the Councils website.	House on the Hill site allocation amended by increasing residential to 52 units.
	3	LCA SA 24	My wife and I live at [redacted] and oppose the proposed development known as House on the Hill. For various reasons, including increased traffic, lack of additional amenities, destruction of community centre that could be repurposed.	Objection noted. However the site is in a highly accessible area, within the borough's opportunity area and is suitable for redevelopment.	No change.
	3	LCA SA24	Petition. 55 signatures The most prevalent comment was that people would prefer it is the existing building was renovated and used	The site is in a highly accessible area, within the borough's opportunity area and is suitable for redevelopment.	House on the Hill site allocation amended by increasing residential to 52 units.

			either in the way it was previously, to provide respite care for vulnerable children, or to provide some other valuable service to the wider community. If the site is turned over for development of 'residential units' then again they would favour some form of sheltered housing/ assisted living facility, but would strongly object to it being sold to private, commercial developers. A further prime concern is over the height and design of any new building and the potential loss of the many trees and shrubs on the site. A multi-storey block would obviously change the nature of, and be out of character with the area. There is a real concern as a result of seeing the many high-rise buildings that have sprung up in central Lewisham and the blocks built in Morley Road and Clipper Way. People also cite the multi-storey monstrosity (Travelodge Hotel) being built at the bottom of the hill as an indicator of what they might fear might happen. Whatever the nature of the development, residents would expect to be formally consulted and their views actually taken into account. The perception, rightly or wrongly, is that Lewisham just 'bulldozes' proposals through without regard for local resident's concerns/ This is one 'small' item in a massive project, but those of us who live here, it is very significant. Additional information found latterly on the Lewisham Local Plan Website (site allocation) indicates there are provisions which seem to meet most of these concerns. Had people even been aware of the proposal and if this information had been more easily accessible, they may not have been quite so concerned. Conducting such a low profile 'consultation' during the lockdown just added insult to injury. One issue which is apparently not addressed is the impact on residents' parking. This is already a concern as a result of the hotel development which has no additional parking provision.	Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. The indicative capacity has been tested through the A21 Development Framework that has been endorsed by the council. -Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. The development will be car-free or car-lite in accordance with London Plan policies.	
	3	LCA SA 25	Lewisham Central Area No 25 A21 corridor and Industrial Park at Randlesdown Road. Again, it would be wonderful to access the water way. The shop frontages need major improvements as do those along Bromley Road between Daneby and Bellingham Road. Nothing will be improved here unless you address the long running issue of cars driving across the pavements to park outside the shops. Giving priority to pedestrians and encouraging cycling will be to no avail unless this issue is addressed first as a priority. I would like to know what is being done about this issue at the moment.	Noted. The Council is seeking to address concerns raised by the public about the existing poor quality of the public realm and townscape at this site and its wider context through the Local Plan. The Council is supportive of redeveloping the site for non-residential uses, appropriate to its SIL designation. Where new development is proposed, it will need to comply with the Local Plan policies.	Land at Randlesdown Road and Bromley Road site allocation has been removed from the Plan.

Lewisham Cyclists	3	LCA SA 25	**Land at Randlesdown Road and Bromley Road;** This site needs to recognise the council transport strategy to deliver the A21 Healthy Streets corridor in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.	The Council is supportive of redeveloping the site for non-residential uses, appropriate to its SIL designation. Where new development is proposed, it will need to comply with the Local Plan policies.	Land at Randlesdown Road and Bromley Road site allocation has been removed from the Plan.
	3	LEA	I am not clear on what the 'Strategic Area for Regeneration' means for Grove Park. There appears to be a site allocation but little further information.	The London Plan directs London Boroughs to identify regeneration areas within their Local Plan. A 'Strategic Area for Regeneration' is proposed to be designated in the Lewisham Local Plan – this is a land use designation and not a site allocation. Further information is set out in Policy LEA3 (Strategic Area for Regeneration) and the policy supporting text.	No change.
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	I have read the plans for Lee Green and surrounding area and would like to express my absolute objection to what is being proposed. My reasons are as follows. I totally disagree with the height of the buildings on the plans. Lee agreed is a small community area and should not become dominated by such huge buildings that will Have very densely populated accommodation. They are way too high and it would totally block out the sky line and make the area very overpowered by huge buildings. It totally unsuitable for such a small area. I understand the need for increased b b housing in London, but this has to be balanced with sensible developments that do not impact negatively on people's lives. The proposal stated 450 more housing units. How is the local area going to cope with such an increase? With not enough amenities to meet the needs of all the people who would then be living there. Where are the schools and doctor surgeries that Would be needed to accommodate all these new residents. Increase in through traffic to an already car heavy main road. This would be Unsustainable if you introduce more residence on that scale into the area. There has been no local consultation. People who live here were fully involved Last time when St. Modwen were proposing new buildings for the Lee gate space All local residents must be consulted, I live very close to the proposed site and this Will affect my life hugely.	Noted. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. With regard to the indicative capacity for the Lee Gate site allocation we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities etc.) that is required to accommodate the level of growth anticipated through the Local Plan. With regard to consultation again this response is directed at proposals currently being prepared by Galliards for the Lee Gate site and not the Local Plan consultation. It should be noted that although the Council does encourage developers to carry out pre-application consultation with residents there is no statutory requirement and this is at the discretion of the developer. The Local Plan consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA LEA SA03 LEA SA04 LEA SA05	Leegate development Developers having field day around here. More high rise I expect. Sterile , have we learned nothing?..... Sent from my	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

		Leegate			
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	I am writing to express my great concern at the dramatic increase in height and unit numbers of the buildings planned at Leegate. We all know the site needs to be improved and developed. That is not in debate. BUT the proposal for 15 storeys is ridiculous. There is a severe risk of daylight and sunlight being blocked at the junction and buildings at Tiger's Head junction. The site will be totally out of keeping for the area, an area many of which are in conservation areas with listed buildings inhabited by families who stay for many years. It will cause a significant change to the skyline of the area which will be severely detrimental and not an enhancement in any way. This is not an area that can be compared with developments at Lewisham roundabout or Kidbroke and therefore a similar plan of dense tall buildings is distinctly inappropriate for the area. The Lee green area cannot cope with the proposed increase in the number of housing units for a number of reasons: -Traffic already queues for lengthy periods at the junction, with queues half way up Lee Road at several times of the day including weekends causing increased pollution, and along Lee High Road to Sutcliffe Park. -Public transport is already at breaking limits with the trains pre-COVID resembling cattle trucks at the peak hours of the day. -Schools already have waiting lists. Until the plans include a primary school you cannot expect young families to be adequately served. In essence: Please make sure the height does not exceed those of the buildings currently in Leegate Include homes for elderly as well as young families Make sure the lead building is not at the north side blocking out light on the junction. The Sainsbury and BMW garage sites must be lower than that of the current low level buildings at Leegate. Improve the infrastructure available with more trains running through Blackheath and Lee. Include plans for an expansion of existing primary and secondary schools to accommodate more children without taking up more land. It is extremely upsetting to face the prospect of Lee Green looking like Lewisham roundabout. I cannot believe that Lewisham Council has not set out strict criteria already to stop wasting more time on this project, when so much should have been learnt from the St Modwen applications.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, roads and public transport etc.) that is required to accommodate the level of growth anticipated through the Local Plan. In terms of housing sales to particular groups, the Council exercises no planning control in this respect. However draft Local Plan policy HO1 set out that the Council will broadly support developers and agents in making a reasonable proportion of new residential units available to local residents, UK citizens and others with a strong connection to the Borough.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Local Plan amended by referring to the marketing of new houses to existing residents and people with a local connection before advertising more widely.

			Finally Galliard is well known for selling flats in Hong Kong and Asia to buyers at discount bulk prices who 'mothball' the flats. This in no way contributes to solving the lack of housing in Lewisham nor achieving the Mayor of London's housing targets. So I would also like an undertaking that all flats that are for sale should be sold in the UK via local agents to British residents.		
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	We are deeply concerned by suggestions that the Leegate is appropriate for development for up to 450 housing units and perhaps 15 stories. Such plans represent a grotesque over development of the site. Surrounding buildings are typically 3 or 4 stories and the highest building in Lee Green is only 10 stories. We cannot see how this site could rationally be seen as appropriate for this scale of development which is totally incongruous with its surroundings. Local amenities (e.g. doctor, dentists, schools, libraries) and infrastructure are inadequate to support this many new units. We are also concerned that including the development of Leegate as part of the local plan is means to largely circumvent consultation on the most controversial aspects (scale and density) of a new planning application for the site. We do not know anyone living in the area who would support a development of such a scale. The local plan should reflect the views and respect the wishes of people living in the area. We would like to see any redevelopment restricted to the height of the existing building or neighbouring buildings. Lee Green is predominately low rise and this should be preserved. We have similar misgivings about the suggestions for the Sainsbury's Lee Green site.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	The amount of housing which is proposed for that small area is ridiculous - it is all too high and the density will be awful for those who live in it especially after the lockdown people will what space not concrete jungles. Taking the Sainsbury's away is very unfair for local people making them travel further for their shopping Please reconsider this dreadful plan Liz Colburn	Noted. The draft Local Plan has been informed by a Strategic Housing Land Availability Assessment, to assist in the identification of sites which may be suitable for development. As set out in draft Local Plan Table 13.1 the number of homes proposed for the East area in Lewisham is relatively limited when compared to the North, Central and South areas. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	Sainsbury's Lee Green site allocation amended to allow for re-provision of a supermarket
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	I am contacting you as I am concerned about the density of the Galliard proposal for so many as 630 homes in Leegate and the height of some of the buildings proposed. This will lead to pressure on resources locally, more pollution from cars and poor housing conditions for those living in high-rise dense area with no direct nor close access to green areas.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

			However, having a new reasonable and sustainable development like the original proposal would be welcomed.		
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	I am responding to the plans which I have just seen My first comment is that the obvious low-key distribution of this consultation on this is worrying, previous plans have been widely publicised by the council but as there were so many objections maybe it was decided to try a less inclusive approach? The height of the proposed development is of concern, having grown up on a high-rise council estate I know the problems these can bring for residents so would suggest Lewisham has enough hi-rise problems in the pipeline without creating more. Surely 10 stories, as now, is enough, what is the improvement to quality of life in a higher build? It is of concern if the local infrastructure can cope with additional homes/residents. Recent attempts by the council to create TFZ given the high level of traffic have failed so why potentially increase traffic with residents needing to use cars, there is no provision for adequate pedestrian/cycling in the plans, it's all about cars (emissions) Regardless of the current covid crisis I am dismayed at the overall structure of this development, reflective of 1990's thinking not 2020's... Trusting my concerns will be considered,	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	As local resident, I would like to make known my objections to the proposals put forward by Galliard Homes for the development of Lee Gate. I agree the area is long overdue for development but certain aspects will I believe be detrimental to the environment and the Lee Green community. Height and density of buildings I understand that a height of 15 floors and 630 new homes is being proposed. This is much too high for the local area which comprises of a mix of styles of houses. No matter how well designed, it would be incongruous and an eyesore being a full 5 floors higher than the nearest tall building to it (Leybridge Court). Infrastructure Common sense dictates that the existing infrastructure - schools, GP services would not cope with the burden of accommodating the needs of the occupants of another 630 homes. Indeed, it is struggling to keep pace with the current population and I have seen the extension to capacity of local schools in my time here. There is also the issue of more traffic and car parking as some residents are likely to have cars.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			Lewisham Local Plan Bearing in mind the points I have made above. I feel strongly that a maximum height of 10 floors (that being the height of the existing flats at Leybridge Court) be the cap for any future developments and incorporated into Lewisham Plan for our area. Furthermore, that cap be taken into account should there be applications to build on other local sites in the future - namely Sainsbury's and the BMW Garage.		
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	As local resident, I would like to make known my objections to the proposals put forward by Galliard Homes for the development of Lee Gate. I agree the area is long overdue for development but certain aspects will I believe be detrimental to the environment and the Lee Green community. Height and density of buildings I understand that a height of 15 floors and 630 new homes is being proposed. This is much too high for the local area which comprises of a mix of styles of houses. No matter how well designed, it would be incongruous and an eyesore being a full 5 floors higher than the nearest tall building to it (Leybridge Court). Infrastructure Common sense dictates that the existing infrastructure - schools, GP services would not cope with the burden of accommodating the needs of the occupants of another 630 homes. Indeed, it is struggling to keep pace with the current population and I have seen the extension to capacity of local schools in my time here. There is also the issue of more traffic and car parking as some residents are likely to have cars. Lewisham Local Plan Bearing in mind the points I have made above. I feel strongly that a maximum height of 10 floors (that being the height of the existing flats at Leybridge Court) be the cap for any future developments and incorporated into Lewisham Plan for our area. Furthermore, that cap be taken into account should there be applications to build on other local sites in the future - namely Sainsbury's and the BMW Garage.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	As a local resident I am totally against this new development proposal. A tower block in the middle of Lee Road and next to the Lee conservation area would look dreadful. There is no provision in the plans for schools or GP clinics as far as I can tell but the implications of all these dwellings is that these will be very much needed. There is a right-of-way for pedestrians through this area which exists currently. A block of dwellings does not usually allow a right-of-way, I would therefore put to you	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

			that this planning application contradicts your own stipulations of right-of-way through the area. This was the reason why the plan for the Asda superstore plan was turned down. I appreciate the need for new dwellings as our population expands but this is a very inappropriate place to put it then them.		
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	I am very concerned about the proposed height of the buildings for the development of the Leegate centre, the BMW garage and other sites at the Lee Green crossroads. The current maximum height of a small number of buildings in this area is 10 stories and this should not be exceeded on this local district site. The proposal to go to 15 stories will ruin the local district and surrounding areas. Proposed development of up to 630 homes is too high density for this area. There are insufficient schools, medical amenities, night time economic opportunities and rail capacity to accommodate this increased population in a small local area. I am also gravely concerned about the increased emissions likely with the increase density in an area already significantly above the acceptable pollutant levels. Lewisham town centre and Kidbrooke village are high rise and high density new development sites and these are sufficiently close to Lee Green not to require a further high rise and high density development on the leegate shopping centre site. This is a local area flanked by conservation areas and the proposed development will ruin Lee Green.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	I write to strongly object to the proposed plans under the above heading. The density is far too great. Plans of the size envisaged need a well thought out infrastructure - which seems to have been completely overlooked here. The proposed buildings are far too high and do not fit in with their surroundings at all. The maximum height of buildings are not mentioned and should be included. A height of a maximum 6-8 stories would fit in with the surrounding area. Plans should be cut right back to a minimum in order to fit in with the Lee Green area.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA LEA SA03 LEA SA04 LEA SA05	I am responding to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. It is very important that the Centre is redeveloped into a good shopping and social meeting area with new housing as well but as a local resident I do have some major	Noted. The Local Plan is a strategic policy document and the Council needs to carefully consider the level of detail provided for each area within the site allocations. Further detailed guidance at a masterplanning level would normally be undertaken	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.

		Leegate	concerns about the current proposals being developed by Galliard Homes which I will outline below. I understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other and enhance the whole area. The Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. Please ensure that the River Quaggy by the BMW site and along to the back of Weigall Road playing Fields is opened up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee. However, I have major concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. I think the Local Plan should set a10 storey maximum height limit for any single building planned for the Lee Green area and also state an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. Very tall buildings would make the area unwelcoming and unattractive and deter people from using the shops and facilities being planned for the site. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will need to respect the proportions of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures of their proposed Leegate development. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre for people to use	as part of a Framework Document or Supplementary Planning Document (SPD). Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The draft Local Plan part 2 policies on Green Infrastructure set out approaches to protecting and enhancing green and open spaces. The remainder of the response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	Leegate Shopping Centre, Sainsburys Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to Old Tigers Head Pub and/ or Grade II Listed Fire Station

			and sufficient parking facilities which will be especially needed by older people when shopping etc. The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children. The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.		
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	I am writing to you in reference to the proposed plans for the Lee Gate development. Having been a resident within the area for the past 7 years and following the various proposals that have been discussed throughout this time, I am really disappointed with what has now been proposed. My main concerns relate to the following: (1) Height of the proposed development- 15 stories (2) Volume of housing to be built (3) Parking considerations for all the additional housing and potential cars parked on neighbouring streets (4) No consideration for improvements for residents that live in the area- new cafes, sports venues, retail outlets, children activities. (5) No considerations and factoring requirements for additional public amenities- schools, GP surgeries, dental practices. (6) No consideration for increased need for public transport- buses, trains. I had really hoped that Lewisham council was planning to regenerate the Lee Gate centre and improve the social aspects associated with living in Lee Green. Original discussions had focused on facilitating cafés, sports, retail and place to socialise with children. The schools are already over subscribed in the area, to the point where we were allocated our 6th choice of school despite living 500m from our preferred choice. Obtaining a timely GP appointment was difficult pre-COVID without an additional 450 homes being built. Additionally, public transport preCOVID was so busy that I constantly had to wait for another bus or train before commencing my journey. The plans being proposed are only going to make living in Lee worse with the area being over populated with minimal places to congregate and placing even further pressure on public amenities.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA LEA SA03 LEA SA04	We are concerned to have been given only a very few days to respond to the proposed development of Lee Green which would affect our neighbourhood greatly. We wonder if this is legal practice?	This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their	No change.

		LEA SA05 Leegate	The expanse and height of the buildings proposed is unacceptable in scale for Lee Green. These buildings would be taller than the surroundings and cause a significant change to the skyline which should only be built in places with transport links and other infra structure that can support them. Lee Green is excluded from the Tall Building opportunity area. The proportions of any higher than present buildings would be inappropriate and overbearing for Lee Green and its environment. The vast majority of buildings are two and three storey homes. The need for transport, parking, medical and educational services has not been addressed. Play areas, community facilities, additional parks, playgrounds and planting of trees is vital. We request appropriate low rise housing development that suits Lee Green in scale and design with supported infrastructure for an area that has been neglected for so long.	views on the scheme through the Development Management process. It should be noted that although the Council does encourage developers to carry out pre-application consultation with residents there is no statutory requirement and this is at the discretion of the developer.	
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	I strongly believe buildings of 15 storeys and over 600 homes will be excessive for the area and if the Leegate, Sainsburys and BMW garage sites are to be built upon to include more housing any buildings should not be higher than surrounding buildings and the design, mass, scale and detailed design (including materials) should be appropriate and in keeping with the area they are being built in. In addition, infrastructure will need to be improved to support any additional housing in the area to fully support the community - whether that be improved transport links, medical facilities and schools, the ability to support already congested roads, detailed plans on ensuring there is no increased, if anything, decreased pollution. The area also has nationally grade II listed buildings and, as such, the height and design of any additional buildings should be in keeping with those that currently exist and certainly no taller.	This response relates to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	I have been contacted regarding the above proposal which is apparently in advanced discussion with Lewisham officers. I have some very general observations which I set out below: 1 Galliard homes (GH) presumably have consultants working on the proposals: who are they? 2 The scheme illustrated is very dense in terms of future populations: what local infrastructure accompanies these proposals? What population density is proposed, and how does this compare with the existing? 3 Local high rise (Leybridge Court) is a group of 10 storey buildings in a landscaped setting without directional orientation. The proposal offered by GH seems to dominate the corner site by building three high buildings	Noted. This response relates to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			running from the corner through to Leyland Road. Firstly the buildings are too high and secondly there is no reason for the Leyland Road block to be as high as proposed. My opinion is that 10 stories is the maximum for any high rise on the site and that Leyland Road requires a lower form to follow the existing three storey houses in the road. 4 In a previous proposal St Modwen were urged to develop permeability to pedestrian flow at ground level. What is offered in the GH proposal? 5 My opinion is that the adjacent sites of Sainsburys and BMW are treated differently. Sainburys may have a maximum height of three storeys above the shop while BMW should allow access to the river frontage with two/three storey housing on the remainder of the site.		
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	I am writing to you to express my concerns over the proposed plans for Leegate and the effects they may have on the entire area of Lee Green and beyond. My first concern is that Galliard Homes' plans for Leegate will not be presented to local people prior to the deadline of Lewisham's Local Plan on the 11th April 2021. Surely, the residents that live within Lee Green should be able to voice their opinions on the proposed plans by Galliard before the consultation ends? This, I believe, shows a total disregard for the rights of Lee residents. Whilst I appreciate that a set amount of housing must be built in the area each year, it is crucial that the views of the residents of Lee Green are considered. I understand that Galliard Homes are proposing to construct a 15-storey tower on the Leegate site. This would exceed the current height limit of buildings in this area by 37%. The London Plan states that tall buildings should only be built in places where transport links and other infrastructure can support them. For any increase in the density of the population of the area we would need plans for improved public transport, new schools, revisions to the road network and GP practices to name just a few. I was under the impression that Lewisham had explicitly excluded Lee Green from its Tall Building opportunity in the draft Local Plan. Also, a high-rise building contravenes the wishes of the community as expressed in the Lee Neighbourhood Plan. With over 50% of Lee Green town centre's buildings being locally and nationally grade II listed buildings, any new developments should be sympathetic with the characteristics of the area. Buildings, in my opinion, should be limited to a maximum of 4 storeys, in line with the Grade II listed fire station.	Noted. This response relates to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. It should be noted that although the Council does encourage developers to carry out pre-application consultation with residents there is no statutory requirement and this is at the discretion of the developer. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. Whilst the Council is working with the Lee Neighbourhood Forum to support its preparation of a Neighbourhood Plan, the Plan has not undergone the necessary stages or been subject to a referendum to be considered when assessing planning applications at this stage.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			In summary, I would ask you to consider carefully the Lee Neighbourhood Plan and ensure that any proposed developments are only granted permission if they fall within the remit and outline of this plan.		
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	Regarding the proposed development by Galliard Homes on the Leegate site, as a local resident I would like to respond to the Lewisham consultation. 1. Height of the buildings. The proposed 15 storey high buildings is 5 storeys higher than the existing single 10 storey high building. This does not meet the expectations of the local neighbour plan. 15 stories would be too high. It would be better to reflect the Lee fire station building / Tigers head building in height (5 or 6 stories) so creating an attractive frontage with commercial properties on the ground floor echoing the historic Victorian frontage. 2. Density If the Leegate site and the Sainsbury site are both developed with possibly 15 storey high buildings there will not be the appropriate infrastructure to support that density of housing. The Sainsbury site should remain as a supermarket. The Leegate site should have lower level housing with open, preferably green spaces, room for a community centre and careful thought on car access in what is already a very busy and congested crossroads. I note that the aesthetic standard of the proposed development is extraordinarily low. I trust this will be looked at carefully.	Noted. This response relates to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, roads and public transport etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	I hope you are all well considering the circumstances. This is the first time I am writing to yourselves as I feel really distraught after hearing the news of new builders taking over the Leegate project near Eltham Road and changing the plans. I feel like in the last few months community was very scared by Lewisham's unconsulted plans for road closures which has caused extreme traffic. Having had to shield with my 3 year old disabled toddler it is awful to have all this smog and noise around the house and never be able to deliver the 6 year old to school in time, get to doctors in time, let alone emergency situations! Our family stress levels have been raised by at least 30% by those inconsiderate and family unfriendly actions. What Lewisham have as a plan now for Leegate, later for Sainsbury's and BMW shop is 100% worse! Overcrowding in terms of community, schools, food shops, parks and overall lack of green spaces. And the worst is traffic! I am really keen on positive changes and improvement in the area. But this needs to be addressed and explained to	Noted. Any planning application submitted on the sites outlined below will need to be accompanied with a Construction Management Plan, to be assessed at the planning application stage. The draft Local Plan encourages developers to register with the Considerate Construction Scheme. Residents will have the opportunity to comment on this and other aspects of the schemes through the Development Management process. The recent closure of roads in the Lee Green area was part of the Low Traffic Neighbourhoods (LTN) pilot scheme, which is outside the scope of the Local Plan. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan's ambitions and policies, particularly to improve air quality and protect local amenity, and are set out clearly in Part 2 Transport policies. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			us in detail. How will it be managed? How can we trust Lewisham again after those road closures? How should I protect my children as a mother? My boy 3 year old was born premature and has lung and heart problems. Smog caused by this overwhelming traffic with street closures in Lewisham are already affecting this health. The traffic was imposed in our neighbourhood and now we are expected to take even more. In addition, will Lewisham take into account and make sure that those buildings meet the current height regulations and not exceed 4 storeys? That is another huge concern as the only source of light are via front windows and if overshadowed we would never see any sun in the house. Other side of the house is barely touched by the sun in mid garden for a couple of hours in summer. How will we be protected from builders parking in our car park? Will you install an electric gate for us? My son needs to use the walker in the car park to exercise and it cannot be used by anyone else apart from our neighbourhood! This is already happening due to night club opening on weekends and parties until 2am, rubbish to be picked up in the car park, kids not being able to sleep due to laud music coming from the cars parked outside and the club itself. If these cars cannot be accommodated at the moment for small parties how will the builders be sorted to protect residents? Apologies for such a long winded email but I feel like our concerns should be raised and considered. We are the ones that will be affected mostly on the road. Again this is not directed at anyone personally we just need clarity. Many thanks for consideration and looking forward to hear from you soon ASAP. I am not looking for laws and regulations I am interested from the human family point of view.	set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	To whom it may concern, I object to the plan to build up to 630 new dwellings in Lee Green, particularly to the proposed height of 15 storeys. As a mum of 2 children who did not get any place in any local primary school, I find it unbelievable that someone would want to add to this local burden. The same goes for the local GP surgeries who, as it is, are unable to look after the local population. Furthermore, public transport already cannot cope with the local demand. Local parks and playgrounds can be over run, not only on warm and sunny days. On these grounds in terms of infrastructure, I very much object to the development as it is proposed. Furthermore, I would like to know if any of the flats would be affordable in the true sense of the word. And lastly, 15 storey tower blocks are not in keeping with the local architecture and would not only cast shadows over	Noted. This response relates to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

			neighbouring housing but also most likely create wind channels.		
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	We have recently become aware of the new development plans for Leegate and am very disappointed by the environmental impact of these plans. There has been very little publicity about them and no public consultation. In recent years Lewisham town centre has been ruined by very tall blocks of flats close to each other being erected so that the whole centre has become dark and dismal. Now it seems the council wants to ruin Lee Green in a similar way. It not only has plans for Leegate but also wishes to develop 2 other sites in Lee Green. The focus is on high density housing with no additional facilities. Large increases in housing need accompanying increases in infrastructure. It is essential that the drains are expanded as there is frequent flooding of Eltham Road due to the drains being inadequate already. The education system also needs expanding as the schools in the so-called conservation area are currently oversubscribed and reluctant to accept children from the other side of Burnt Ash Road despite there currently being no other primary schools in the area. This in effect means that Lewisham is discriminating against less privileged families and that that the education of our children is being sadly neglected in these plans for the borough. In addition, there is only one secondary school funded by Lewisham within this area and that too is on the edge of the conservation area. The density of the housing plans will increase traffic and the recent traffic plans introduced by Lewisham have increased traffic on both Burnt Ash and Eltham roads, not to mention the South Circular, resulting in additional pollution on these roads and discrimination against those who happen to live on them compared with the privileged occupants of the conservation area. Lewisham needs to state what plans it has for infrastructure improvements in Leegate. We are also concerned about the height of the buildings being allowed in Lee Green.. They are totally out of proportion with other buildings in the area and will cause significant change to the skyline which is against the Mayor of London's planning policy. The proposal for 15 stories by Galliard Homes exceeds even the maximum height of the tallest existing buildings by 5 stories or 37% and will dwarf current Grade II listed buildings. A maximum height of the current tallest building should be specified in Lewisham's plans.	Noted. This response seems to relate to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The draft Local Plan sets out a vision, spatial objectives and planning policies for the East Area, including within Lee Green, to help ensure a coordinated approach to future development within the area. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, roads, public transport, utilities, etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA LEA SA03 LEA SA04 LEA SA05 Leegate	I have recently become aware of new plans for Leegate centre redevelopment. I understand it will be 15 stories high, and contain 630 new homes. I have to add my voice as a strenuous objector. The imposing nature of such a structure will be enormously overbearing on the local area, especially when it's adjacent to a conservation area. It should not be aiming to out-do	Noted. This response relates to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

			the ugly tower blocks on Eltham Road, the redevelopment should be trying to tie into the lower level residential character of the area. In addition, the objections from before still carry. 630 new residents will need amenities, such as doctors, dentist, schools, etc. These services haven't changed in the interim, in fact council spending in the area is extremely low. Additionally, it will add hugely to the traffic in the area - an issue which has troubled the council recently. The addition of hundreds of new cars will exacerbate the existing problems, especially when building these homes on a busy junction, where air quality is already causing existing residents health concerns. The homes will be in a dead-zone regarding other commuting options, specifically, the trains. Furthermore, the plans seem to suggest enormous additions to the BMW garage site and the Sainsbury's site. I find these objectionable for the same reasons above.	With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	
	3	LEA LEA SA 03 LEA SA 04 LEA SA 05	My comments on the Local Plan as follows: • Density - current level of housing can only increase in Lee Green if infrastructure such as schools, doctor surgeries, and transport (trains, buses, cycle lanes), green outdoor spaces has at least the same amount as it is to date per residential unit. I would want planned infrastructure improvements for Lee Green explicitly named in Lewisham's Local Plan. I am not happy for Leegate, Sainsburys and BMW garage to be built upon more intensively in order to include more housing. • The maximum height of any new buildings should be no taller than the current buildings on the sites of Leegate, Sainsburys and BMW garage. I would want this maximum height for Leegate, Sainsburys and BMW garage sites to be included in Lewisham's Local Plan. • I would want the Local Plan to explicitly state that any new development on the sites in Leegate, Sainsburys and BMW should not just be studio or 1/2 bedroom flats but would be a mix with family suitable homes (3 bedrooms). • I would want the Local Plan to state that there must be significant green and public spaces in any development of Lee Green, including Leegate, Sainsburys and BMW. • Urban design - I object to developments including Lee Green that do not meet a mixed use of outdoor and community spaces supporting social inclusion	Noted. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density and scale from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, roads and public transport etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA	Traffic Impact The vision (as all visions) sounds good but the problem with the proposals for Lee Green is that they do not take account of the impact of, for example, up to 630 housing units on the Leegate site. I note in the request for scoping that work has still to be undertaken on Impact Assessments for traffic, pollution levels, population etc. – but prima facie the present levels of traffic would argue for a much smaller development at Leegate. However much there is a hope that new residents will not use cars, and even if by 2035 cars will be electric, there will still be heavy	Noted. This response relates to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

			traffic at the Cross Roads. Thus at the moment road and public transport infrastructure is inadequate to sustain the level of housing proposed at Lee Gate. Should there be further tower block housing above the Sainsbury's store and on the BMW sales then the traffic and public transport impact will be further worsened. That Visual Impact. I see the proposal includes a 15 floor tower block on the northern section of the Leegate Centre. No tower block should exceed the height of the Lethbridge Estate but if the new centre is to be in keeping with the current heritage of Lee Green then new buildings that line the streets should not exceed the height of the buildings round the Young Tigers Head. They should be in keeping, but in a good modern architectural style with the historic buildings of Lee Green. Population Impact. The scoping exercise needs also to assess the impact on local population numbers with the consequences for health care, education, communal facilities. I note that in the scoping letter the developer offers funding to assist with any impact on health care. That is not adequate if it is solely a lump sum and does not cover the on-going costs of additional medical services, including salaries. There is also a need to consider the potential needs for nursery, primary and secondary education for any families who may live in these affordable apartments. I will continue to keep a close watch on proposals as they develop. I use the shops in Lee Green several times a week.		
	3	LEA	The Local Plan has multiple references to intensification and this is a clear policy direction based on housing need. However, intensification will lead to greater numbers of residents and increased demand for community facilities and green spaces. Covid has highlighted the importance of green spaces and community facilities will be even more important in combating issues of isolation and mental health. In one of the recent consultation zoom meetings there appeared to be a reference to building on the Grove Park library site. Housing built above, or on, community land complicates and often inhibits community use, or future development of the land for community use. The community sites in Grove Park need to be maintained for community use and not for housing developments. The local plan could give greater clarity on the designation and intentions for the important community facilities in the Grove Park area including: Ringway Community Centre and Gardens Library and gardens Youth Club WG Grace Community Centre	Noted. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, roads and public transport etc.) that is required to accommodate the level of growth anticipated through the Local Plan. In addition, draft Local Plan policy CI1 Safeguarding and securing community infrastructure provides strong strategic protection for community facilities. The Grove Park Neighbourhood Plan is now 'made' and forms part of the Council's statutory Development Plan. This provides further detail protection of the community facilities outlined in this response.	No change.
	3	LEA	The old large plain trees in Grove Park are part of the history of the area and line the main roads. They are an	Noted. The Local Plan is a strategic document, and as such it is not considered proportionate to identify specific groups of trees in specific areas. However the	No change.

			essential part of the local character. Recently 6 of these trees were under threat and only intense lobbying saved them. It was clear that they did not have adequate protection. The local plan needs to set out the importance of these trees both in Grove Park and across the Borough, and give them enhanced protection as they are a valued and important local asset. They are important aesthetically and create an enhanced environment, particularly for pedestrians, shading walking routes and giving a feeling of protection from the road.	draft Local Plan recognises the importance of the Borough's trees and canopy cover and the role they plays in contributing to local character, the environment and tackling the climate emergency. Policy GR4 on Urban greening and trees provides strategic policy guidance on the retention of trees.	
	3	LEA	There is a clear and understandable emphasis on the historic character of areas such as Blackheath. There is less recognition of some of the historic or interesting architecture in areas such as Grove Park which also has housing and buildings of note. On the map of Non Designated Heritage Assets there appears to be very few assets listed for Grove Park. The row of Edwardian terraced houses on Coopers Lane in Grove Park are a good example of historic housing from the turn of the last century that remains true to the original built form. These are of note, reflect the history of the area, and add to local character and distinctiveness. (I must declare an interest as I live in one of these houses). The same can be said of the significant numbers of distinctive 1930s housing that could be designated as an Area of Special Local Character. Napier House should be locally listed.	Noted. The draft Local Plan seeks to preserve and enhance the significance of heritage assets and their setting, in line with national planning policy. The draft Local Plan Part 2 section on Heritage includes policies for both designated and non-designated heritage assets. It reflects the Council's current list of statutory listed and locally listed buildings. The local List was reviewed recently and a large number of properties added to this list. We will continue to review and update where appropriate.	No change.
	3	LEA	There does not appear to be a clear vision for the regeneration of the local centre of Grove Park as identified in the Neighbourhood Plan. The Plan could give greater clarity to the green linkages to the centre and a clear commitment to the creation of a district park.	Noted. The Local Plan is a strategic policy document and as such the Council has to balance the level of detail for each of its many centres. The key spatial objectives for the East area address the Grove Park local centre, and these are supported with site allocation policies within the centre itself. The Grove park neighbourhood plan is now 'made' and forms part of the Council's statutory Development Plan. It provides a further detailed vision for the area including the role of the centre and key green links. The Neighbourhood Plan will be used in conjunction with the Local Plan in the assessment of planning applications and regeneration decisions.	No change.
	3	LEA	There is recognition of some of the more formal green spaces in Grove Park but I cannot find reference to the green corridor which exists from the Willow Tree Stables site following the train line towards the local centre. It is important that this is recognised as such. The Plan needs to show more clearly in both maps and tables all of the green open spaces and green infrastructure in Grove Park and their designations and linkages.	Noted	East Area Key diagram amended to provide greater clarity.
	3	LEA	Nor can I see why the office block already standing along Burnt Ash Road has been mainly unused for years and has not been converted into social housing, unless it is due to changes in ownership of Leegate	Noted. This comment will be passed along to colleagues in the relevant service area within the Council.	No change.

	3	LEA LEA SA 03	Most local people agree that the Leegate Centre has been mismanaged and left to deteriorate, but a sensitive and viable development, taking account of the limited local infrastructure, need for shops, community facilities and job opportunities is what we need. The decision to significantly intensify the residential use of the Leegate Centre is in direct contradiction to your stated LEA1 East Area place principle A (a) to "secure the centre's long-term vitality and viability and to enhance its role as key focal point for community activity, in line with Policy LEA2 (Lee Green district centre and surrounds)". The over-development of the Leegate Centre site as an intensive residential area with buildings out of scale with the immediate surrounding neighbourhood does not contribute to the "vitality and viability" of the centre or its role as a "key focal point for community activity". There are few community focussed opportunities for local activities within the proposed site and the over-development of housing will lead to an imbalance in facilities in the local area. While the redevelopment of the Leegate Centre as an intensive residential site complies with your blanket Principle E ("The intensification of sites within the Lee Green district centre"), it clearly contradicts your LEA1 East Area place Principle A – "Development proposals must make the best use of land in helping to facilitate Good Growth". 'Good growth' (there is no definition in your draft Local Plan glossary) is not facilitated by intensive residential development at the expense of commercial and community infrastructure. Your LEA1 East Area place Principle F – "Development proposals should seek to address elements of the built environment that segregate neighbourhoods and places from one another" - is completely undermined by the proposed plan for the Leegate Centre. There is little ability to negotiate the tall, densely packed buildings in the plan proposed, extremely limited permeability, few opportunities for pedestrian facilities or community infrastructure. The new densely packed residential area will be in direct contrast to the more spacious residential areas and green sites bordering the development and linkages will be lost between community spaces. The proposed height, density and massive scale of the proposed building development at Leegate Centre are out of keeping with your LEA1 East Area place Principle F – "The sensitive intensification of established residential neighbourhoods will be supported where new development responds positively to their distinctive local character, including the landscape setting". There is no attempt at matching any of the local neighbourhood's characteristics in the development and no green space to match that of the Leybridge Court estate which is just across a minor road from the site.	Noted. Disagree with the position that the vitality of any town centre cannot be maintained by developing mixed-use schemes that incorporate residential as well as non-residential uses. Indeed, this is the policy direction of the London Plan to ensure there is a sufficient critical mass of residents within town centres to support their long term vitality and viability, for example, by sustaining local facilities and services. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density and scale from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land. The remaining points seem to relate to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan glossary amended to include definition of Good Growth, in line with the London Plan. Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			The lack of human scale or public realm in the proposed development at the Leegate Shopping Centre is a huge concern. The proposed height and mass of the buildings increase the destructive environmental impact of the development on the construction process, change the nature of the current neighbourhood and take account of developer ambition rather than local regeneration needs. It appears that hitting Lewisham targets for the growth of residential units is taking precedence over the genuine needs of the local population of Lee Green. The draft Plan's principles should be honoured by your site allocations and planning decisions. The Council needs to ensure that it complies with its own expressed principles and objectives for local people. The Leegate Centre desperately needs to be tackled in an effective way to meet local requirements for good quality housing. Please ensure that you listen to residents and deal with this eyesore that we have been suffering for years without action by the council or the site's previous owners, but do not make it worse by insensitive and intensive development.		
	3	LEA	Note: In relation to Lee Green. The draft plan incorrectly identifies a shop occupancy rate of only 40% but it is clear that the shops in Lee Green outside the Leegate centre have the highest occupancy rate of any District Centre in the borough. The shop units within the Leegate Centre have been poorly managed for over twenty years with shopkeepers leaving because of rent increases despite extremely poor maintenance of the site.	Noted. The figure cited in the plan pertains to vacancy rates, which were considered as part of a town centre survey. The survey only considered shops within designated shopping frontages in town and local centres. Following the Regulation 18 consultation, a new Retail Impact Assessment and Town Centre Trends study has been prepared and information from this will be cited within the Regulation 19 document, as appropriate.	No change.
	3	LEA	Burnt Ash Hill was proposed for Streetscape at the same time as Manor Lane but was shelved for Cost reasons and also Utility Spaghetti issues. At present it is a Rubbish Dump. We wanted to put Planters where the Commercial Bins had been removed but were denied on the spurious grounds that they would be an impediment and lack maintenance. Hey 2020/21! What have we got under LTN at the top of Woodyates Road junction with South Circular? A Planter on the pavement restricting the width to under a half and a hazard to visually impaired and/or people with walking difficulty. The Planters which have a maintenance contract being paid for by the Council have NEVER been maintained and are receptacles for Passers-By's rubbish!!	Noted. This response pertains to schemes which are outside the scope of the Local Plan, for example, Low Traffic Neighbourhoods. However these comments will be passed on to colleagues in the relevant service areas of the Council.	No change.
	3	LEA	I very much support the idea of development of Lee Green as a greener, tidier and more economically developed place to live and agree with the majority of the proposals. In particular I lend my support to: - Retaining and improving Lee Green as a welcoming centre of economic and community activity - Improving the area around Lee Green station and the Chiltonian Industrial Estate	Support noted.	No change.

			- Protecting and enhancing our ability to engage with Lee's green spaces and the river Quaggy and taking advantage of Lee being on the Green Chain Walk		
	3	LEA	Having recently moved to the area, I am a huge supporter of the LTN and I hold strong concerns about the threats to safety, noise and air quality that frequent, heavy site traffic will create. I hope you will be able to ensure the ongoing safety of our local road network.	Noted. Low Traffic Neighbourhoods are outside the scope of the Local Plan. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes, and road safety, are central to the Local Plans ambitions and policies and are set out clearly in Part 2 Transport policies.	No change.
	3	LEA	I write as a resident of Lee Green. I understand that there are proposals to upgrade and improve Lee Green, including building high density high rise units. Whilst I agree in principal with providing much needed homes for people, I do not think that Lee Green can be like Lewisham in terms of supporting large numbers of homes for people. For example there is insufficient space to build homes; insufficient amenities, including GPs and schools, to support large numbers of new residents; and the roads are practically grid locked in rush hour. There is also no parking available and public transport is limited and slow in Lee Green. High rise buildings would spoil the area and are not what people want to live in. The current high rise buildings at Leegate are pretty ugly and do nothing for the skyline. More high rise units would totally change the character of the area and might not attract people to rent or buy them. Since Covid, people have reassessed how they want to live and the demand for more space has changed the demand from small gardenless flats to houses with gardens. With more people working from home, the demand will be for small friendly shops, community activities such as yoga and green spaces to walk dogs and children. Currently Lee Green looks tired and suffers noise and air pollution from heavy traffic, fly tipping and a glut of unhealthy fried chicken outlets. Shops like Sainsbury's (which is not too big), the new Blackheath store on the New Tiger's Head site and the small businesses near the dubious Wetherspoons have enhanced the area. Low rise dwellings and some additional green park space to complement these would be good for Lee Green Leegate. Lots of tree planting would help diffuse the road pollution, but I would suggest that new units should be set back from the main road so people do not suffer from noise and air pollution.	Noted. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, roads and public transport, etc.) that is required to accommodate the level of growth anticipated through the Local Plan. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density and scale from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The draft Local Plan includes a raft of measures which address the need to protect and enhance local amenity. This includes tree building design, tree planting, landscaping, and public realm.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA LEA SA 03 LEA SA 04	In Lee Green, I would like to see the following:	Noted. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

		LEA SA 05	Building of no more than 8 stories high in the Leegate Centre. I would like this specified in Lewisham's Local Plan. No further housing to be building on top of Sainsburys and the BMW garage sites. I would like this specified in Lewisham's Local Plan. Adequate parking infrastructure for any new houses built New transport links and increased services to cope with any increased housing. I would like infrastructure improvements for Lee Green explicitly named in Lewisham's Local Plan. New schools, nurseries, GP surgeries to cope with any increased housing. New playgrounds, parks and other leisure facilities to cope with any increased housing New green areas and trees to counter any increased traffic In the Leegate centre, I would like to see more dining and retail options, particularly from local independent businesses and not from large chain stores. I would also like to see a gym and pool.	Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, roads and public transport etc.) that is required to accommodate the level of growth anticipated through the Local Plan. Site specific requirements for strategic infrastructure are set out in site allocation policies, where appropriate. The site allocations for Lee Green district centre provide for mixed-use redevelopment, and will provide for a wide range of uses to locate within the centre to support its long term vitality and viability. The site allocations will enable the reprovision of appropriate main town centre uses with residential above. This is in line with good urban design principles and current planning policy. The appropriate level of car parking provision within new developments will need to be considered having regard to the London Plan parking standards.	
	3	LEA	3. Welcome the intention to improve the environment along Lee High Rd and the South Circular but found little information in the plan of what exactly you were going to do	Noted. The Local Plan is a strategic policy document and sets the Council's ambition for managing growth and change. In general, the Healthy Streets Approach will be advocated for Lee High Road and the South Circular. Details of any future proposals will be developed in partnership with Transport for London.	No change.
	3	LEA LEA SA03 LEA SA04 LEA SA05	Dear Sirs, I have today been contacted by a better Leegreen describing the plans to build new homes in three locations including the Leegate Centre and Sainsbury's. Firstly, I really hope that we can keep the Sainsbury's. It is a good supermarket in a residential area. This means that unlike larger supermarkets in outdoor purpose-built malls, such as Greenwich Peninsula, local residents can easily walk or cycle to the local supermarket. This is a massive amenity for the area. The alternative would be more people driving further away. It also provides employment for many local people. Secondly, I hear that the plans for flats at the Leegate Centre would be a 15 storey building. This would be entirely out of keeping with the area as nothing else is that tall. I would be very concerned that this would set a precedent and then Lee Green would have more tall buildings too. Abetterleegreen says that Lee Green has been designated as an area that **should not** have such tall buildings.	Noted. The draft Local Plan site allocation for the Sainsbury's site, LEA SA04, makes provision for main town centre uses, which will enable the reprovision of a supermarket. The remaining points seem to relate to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, roads and public transport etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.

			Where would the doctors surgeries, school places etc. be for all the new residents of such a huge block? It is already difficult to get local children into local schools, especially secondary schools. Please ensure that my views are taken into account in objecting to these two developments.		
	3	LEA LEA SA03 LEA SA04 LEA SA05	Dear Sirs, I am writing to you as a concerned resident of Lee, specifically in relation to the plans for Leegate. While I appreciate that there is a need to increase housing, I am concerned about the density and height of the housing proposed on each of the 3 sites - Leegate, Sainsbury's and the BMW garage. Density: I do not feel that it is necessary or appropriate to build 450 homes on the 3 proposed sites for the following reasons: - Transport: I have lived in the area for some 5 years and am already noticing that infrastructure to support the area is creaking at the seams. The trains from Blackheath, Hither Green and Lee are already full by the time they get to each of these respective stations and will undoubtedly become worse. While I appreciate that COVID may have an impact on WFH, this is not yet a known quantity and therefore to predict that the increase in housing will not have an impact on transportation is in my view, foolhardy and irresponsible, especially regards the individuals, who like me, already pay large amounts to commute to work. - Schooling: It is my understanding from local neighbourhood forums that schooling is insufficient to be able to accommodate the proposed increase in housing density. There has already been very large expansion of the Kidbrooke estate and the changes proposed for Leegate will also undoubtedly put pressure on local nursery's, primary and secondary schools. Children need good education and safe places to learn and I do not feel that this has been considered as part of the wider plan. - Other facilities such as local shops are also not adequate to support the proposed increase in housing density. The local Sainsbury's is a great resource and while I am not proposing that additional supermarkets are built, (in fact this would be disastrous for traffic and congestion, especially as many of the local routes have now been blocked,) more needs to be invested in the local surrounding area to support local businesses. It would also be important to encourage shops, restaurants, cafes and fitness spaces into the area by providing grants or additional financial incentives which I do not believe has been covered as part of the plan. - Open spaces: While there is the benefit of Manor Park, the density of the housing proposed will have a significant impact on local parks and outside spaces. With the after effects of a post COVID world unknown, the public parks	Noted. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density and scale from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available. The draft Local Plan site allocations for Lee Green centre will enable provision for a wide-range of main town centre uses at the ground floor level with residential above. They also require significant public realm enhancements to be delivered to support the centre's vitality and viability. Grant funding for business development is outside the scope of the Local Plan. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, roads and public transport etc.) that is required to accommodate the level of growth anticipated through the Local Plan. The remaining points seem to relate to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			and spaces will be vital to ensure that individuals are able to socialise and connect in an appropriate and socially distanced way. Height: - I am also extremely concerned about the proposed height of the housing stock and do not believe that this needs to be 15 storeys as proposed. The style of housing would be totally out of line with the housing stock of the area, Flats and tower blocks in my view would actually ruin the local area and should be restricted to a maximum height of 3 or 4 stories only (as is currently the case) . This is extremely important to me as a local resident who bought a property in the area for its housing stock and the lack of high rise. If this is the environment I wanted to live in, I would have purchased in Canary Wharf or Lewisham. I know that there will be many individuals who feel the same as me in this regard and this has not been taken into consideration, save for maximising the profits for the developers and also the council. - I would like to INSIST that the maximum height be restricted to 3 or 4 storeys and the maximum height for each site clearly written into Lewisham's local plan for certainty and to prohibit the developers now or in the future, from developing tower blocks in the area. I am aware that the Neighbourhood Plan states that buildings must NOT be higher than surrounding buildings (in this case 4 storeys) that design, mass, scale and detailed design (including materials) must be appropriate for the surrounding area. Again it is extremely important to me as a resident, that new housing stock is built in accordance with property already in the surrounding area. I would ask you to strongly consider the above and also the feedback from all of the local residents before you engage in any arrangements or approve plans submitted by the developers. The local area has historical significance which needs to be retained. It is the reason myself and other local residents bought in the area and continue to enjoy living in the area. Therefore, please do NOT ignore our comments or views.		
	3	LEA	Re Lee gate proposal and my objections 1. Tallest building In Lee 10 storeys. This should be the limit 2 opening of Quaggy river so why build on bmw land? 3. Lack of infrastructure for too Much sudden growth 4.planning should be in keeping with the style of the area. - heritage buildings and so on	The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, roads and public transport etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

				The site allocation for the BMW site seeks to facilitate the redevelopment of the site, whilst ensuring the site design improves the amenity value of the River Quaggy, including public access to it.	
	3	LEA	Hi, I understand that the deadline for the local plan consultation is 11th April. I haven't received a letter about this - is it not usual practice to leaflet local residents to make them aware? Also, it would've been easier to have an online form or survey to complete instead of email but I couldn't find that as an option. My comments on the Leegate plan: The plan to add a high number of new homes - what plans do you have to improve the local infrastructure for this? Public transport - rush hour trains from Lee station are very overcrowded so this would need to be provided for. As are many of the buses. Schools - all primary schools in the area are heavily oversubscribed. You need to build a new school or expand an existing school if you plan to build new homes. Current Leegate - there is a fantastic community currently operating there and many brilliant local businesses. I would like a commitment to keeping these on as they really do add to the area. We should be promoting and supporting independent retailers as much as possible. High rise buildings - I think the height of the buildings should be considered and keep in sync with the local area. Promoting cycling/walking - how will the plans support better options for cycling and walking in the area in order to reduce the high traffic levels? Many thanks for taking my response on board.	Noted. The Local Plan consultation was carried out in accordance with the Council's adopted Statement of Community Involvement (SCI) which can be found on the Council website. It is not standard practice to send leaflets out to all local residents; however a notice was included in an issue of Lewisham Life which was distributed to all households in the Borough. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, roads and public transport etc.) that is required to accommodate the level of growth anticipated through the Local Plan. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. In addition, the new policy on Lewisham Links will provide a more granular level of detail for the East area.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA LEA SA03 LEA SA04 LEA SA05	I am pleased to see that it looks as if development of Leegate may soon be going ahead. As a local resident I do have some concerns and would like to share these with you. I understand you are potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury. Please ensure that the River Quaggy by the BMW site and along to the back of Weigal Road playing Fields is opened	Noted. The draft Local Plan site allocation for the BMW site, LEA SA05, a key requirement is improvements to enhance access to and visual amenity of the River Quaggy. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Land at Lee High Road and Lee Road site allocation amended so that the reference to enhanced access and amenity of the river has moved from Guidelines to a Requirement

			up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee. I am not happy that the height of the buildings look as if they are going to be more that the Leybridge Estate. 10 stories should be the maximum for any of the planned buildings and the infrastructure should be supported so it can match the number of new residents – medical practices, schools, green space and play areas etc. Lewisham need planned infrastructure improvements for Lee Green named explicitly in Lewisham's Local Plan. I'm resident of Leybridge court. I've got two children and been living here for nearly 20 yrs. With all the tall building you're planning to build we won't see a sunlight anymore not to mention beautiful sunsets. Please, don't do that to us. We are already stuck in small flats.	requirements in terms of housing targets and making best use of available land within the capital. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The draft Local Plan includes policies to ensure protection of amenity, including design requirements dealing with outlook, daylight and sunlight.	
	3	LEA LEA SA03 LEA SA04 LEA SA05	Dear Sir / Madam I live in SE12 and frequent Leegate fairly often and thus would like to comment on the latest proposals for Leegate and the local plan. Density: I am concerned that much more housing is now proposed, including the Sainsbury's and BMW sites. I am not happy about this as the area is a traffic hotspot and there's only really bus transport. Agreed Lee,or Blackheath railway stations are within 15 minutes walk, but those services are overcrowded at peak times. So infrastructure will need improving dramatically here, to avoid people reverting to their cars. Planned infrastructure improvements need to be included in the local plan. Height of new buildings: 15 storey blocks are far too high, just look at how the Lewisham station area has been blighted by unsightly tower blocks? The views across London have been blighted. Existing vistas and outlooks will also be blighted, and shadow caused by this 15 storey block. The mobile phone antennas on the nearby fire station and also Merridale may be affected too, meaning more mobile phone towers will be needed. I think a maximum of 10 storeys is reasonable and in keeping with area. Lee Green is a unique area and people often comment on how different it is compared to other areas. Lewisham Council have a duty to protect the area from over development. Many thanks for your attention,	Noted. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. The remaining point seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

	3	LEA QD 04	I have read the planning details for development of the Leegate / Lee Green centre and wish to register my concern about the amount of high rise building as part of the development. The result of the traffic calming measures in the area has been an increase in traffic around the Burnt Ash Hill area - traffic regularly is stationery waiting for the lights towards the south circular creating intense pollution at this important cross roads for the local community. I am concerned that any major building around this area will place additional pressure on traffic. There does not seem to be enough space in the plans provided for green space to enable local community to enjoy the benefit of recreation and green space. I firmly object to the planned high rise developments. 15 stories is far too high for the area. I would support building proposals that are no higher than the fire station. This is a historic location and does not have a train station within 1/2 mile, therefore putting such an emphasis on high rise building will increase traffic in the near vicinity. It is unclear what the additional infrastructure plans are to support buildings of such a high number of stories. This is likely to have a detrimental impact on the existing community. I would support a reduced height for the buildings as well as enabling the independent shops and businesses that are currently operating in Lee gate to develop sustainable businesses.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA QD 04	I am concerned that the proposed development at Leegate includes a building which is 15 floors high. This is far higher than any other building in this area. It will create a hemmed in atmosphere in this area which often has a very heavy flow of traffic. I would like any new buildings in this highly populated area to maintain human proportions, capped at a safer eight floors. I feel this would be far-more fitting for this residential area. Very high buildings are being built nearby, next to Kidbrooke station. At least they are in a contained area, away from other homes and shops. The proposed Leegate development is in a different kind of place. It's where people live, shop, travel to work, socialise. I believe that having a very tall building here would irrevocably change the nature of our area. Please consider a maximum height of eight floors for any part of this development.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
Blackheath Society no 2	3	LEA	**Vision** 75 references to Blackheath (including 4 photo captions). Only three references to the large Blackheath CA. No holistic, balanced vision for Blackheath area and for preserving and enhancing its character in terms of Village, Heath and residential CAs, (economic, environmental, heritage/housing/design). See suggestion in Annex.	Noted. As set out in the draft Local Plan, Lewisham's East Area comprises of Blackheath, Lee and Grove Park and as such the vision and policies for the area straddles these three areas. Nevertheless there are a number of references to the spatial qualities of Blackheath and specific place policies relating to preserving and enhancing the distinctive qualities of Blackheath Village. The Local Plan is a strategic document and the Council needs to carefully consider the level of detail provided for each neighbourhood; it tends to focus on those areas that will be subject to	No change.

				higher levels of growth and significant change over the plan period. A more granular vision for Blackheath could be prepared through the neighbourhood planning process.	
Blackheath Society no 2	3	LEA	Concern at Blackheath being designated a District Centre (para. 16.6) (as in London Plan) and an area for 'a vibrant night time economy' i.e.6 p.m.-6 a.m. (para. 16.7). Blackheath Village currently only has a day and evening economy (6-12) because it is also residential. It is not suitable for nightclubs, all-night cafés etc.	Noted. Blackheath's designation as a District Centre has been carried forward from the adopted Local Plan and assessed against a defined set of criteria. Its designation as a night time economy area 'of more than local significance' is established by the London Plan. The suitability of appropriate uses within the town centre will be assessed against relevant Local Plan policies. Both the adopted and draft Local Plan include policies dealing with the protection of local amenity.	No change.
Blackheath Society no 2	3	LEA	Concern also at what is meant by 'the character of established residential areas will be reinforced, with their *sensitive intensification* [sic] providing for improvements throughout the wider area.' (para. 16.7)	Noted. This approach is considered to be consistent with London Plan policy GG2 Making the best use of land. The Council has prepared a Small Sites SPD to ensure that developments are appropriate to their context and respond positively to local character.	No change.
Blackheath Society no 2	3	LEA	Concern at no mention of volume and type of traffic through Village, over Heath and through residential areas. This is substantial and varied – including large and heavy lorries as well as many buses and cars. Big impact on pollution, noise, safety and general amenity and character of the Village and wider area.	Noted. As the Local Plan is strategic borough-wide document the Council needs to carefully consider the level of detail provided for each neighbourhood; it tends to focus on those areas that will be subject to higher levels of growth and significant change in the plan period. A more granular vision/approach for Blackheath could be prepared through the neighbourhood planning process.	No change.
Blackheath Society no 2	3	LEA	No mention of need for children's play facilities and public toilets on Heath/near Village, and other enhancement work to ensure 'residents and visitors will benefit from excellent access to high quality parks, open and green spaces.' (para 16.8)	Noted. As the Local Plan is strategic borough-wide document the Council needs to carefully consider the level of detail provided for each neighbourhood; it tends to focus on those areas that will be subject to higher levels of growth and significant change in the plan period. A more granular vision/approach for Blackheath could be prepared through the neighbourhood planning process. The Council's Parks and Open Spaces strategy sets out priorities for investment in these areas, and should be referred for further information.	No change.
Blackheath Society no 2	3	LEA	Talk of 'a network of walking and cycle routes' (para. 16.8) but no mention of idea of 15 minute city to encourage walking/cycling/bus use instead of cars/delivery vans.	The spatial strategy broadly supports the principles of the 15-minute city or neighbourhood. For clarification, the policy supporting text will be amended to refer to this.	Policy OL1 spatial strategy supporting text amended to refer the 15 minute neighbourhood concept.
Blackheath Society no 2	3	LEA	**Spatial objectives** We support spatial objective 2 'Preserve and enhance the distinctive qualities of Blackheath Village district centre whilst building on its strengths as a key visitor destination.' But we think it needs to be linked to include the Heath (mentioned opaquely in special objective 7 as 'Maritime Greenwich World Heritage Site Buffer Zone at Blackheath') and the residential areas around the Village and Heath that together make up the neighbourhood and community of Blackheath. Some of these areas are just across the borough boundary in the Royal Borough of Greenwich, which adds to the challenge of managing the neighbourhood as a whole. No mention is made of the	Agree that more recognition should be give to the heath at Blackheath. References to joint working parties are beyond the scope of the Plan.	Local Plan amended to make reference to the heath at Blackheath, as part of the linear network of green infrastructure.

			Blackheath Joint Working Party (BJWP) set up by Lewisham and Greenwich Council to advise on management of the Heath.		
Blackheath Society no 2	3	LEA	**Site allocations** The overall scale seems broadly reasonable for the East Area, although some are very speculative. The south of the Area has only one modest site. We have expressed our opposition to the intensity of development at Blackheath Hill, now approved by Strategic Planning Committee. We have similar concerns about Leegate, part of the intensive cluster of Lee Green sites, where we fear excessive height and density, and too little high quality public realm.	Noted. The Council has engaged with and consulted landowners through the Local Plan process to help ensure that site allocations are deliverable and developable within the plan period. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	No change.
Blackheath Society no 2	3	LEA	**A Prospect for Blackheath – a vision for next 5-10 years** **Blackheath enjoys many attractive characteristics. The vision aims to conserve and improve Blackheath's historic liveability and charm as a Borough recreation, culture, and leisure resource by protecting and enhancing the distinctive character of its buildings, economy, natural environment, and the heath. The main aim is to support Blackheath's future as a lively and contemporary neighbourhood with exceptional heritage and unique open spaces, a strong local economy and community spirit within a 15-minute walk of extensive characterful residential areas.** **Village** • Maintain mixed economy of retail; food/drink, professional, personal, and financial/legal services; community/cultural facilities and varied historic residential areas and house types. • Develop support for small business, innovation, start-ups and cultural enterprises. • Reduce road traffic; increase walking and cycling in a safe and healthy environment. • Improve the quality of, and possibly extend, the public realm including pavements, squares, and greens. • Maintain the scale and special character of the village. • **Heath** • Protect existing local and distant views. • Plant more trees round the fringe to protect the skyline, maintain the existing character and reduce pollution. • Increase biodiversity and restore historic heathland character. • Continue to support greater, wider, and more varied use with more protection from degradation, and erosion. • Meet need for toilet and play facilities. • **Residential surroundings**	Noted. It is considered that the Local Plan broadly supports these objectives. However, as the Local Plan is strategic borough-wide document the Council needs to carefully consider the level of detail provided for each neighbourhood; it tends to focus on those areas that will be subject to higher levels of growth and significant change in the plan period. A more granular vision/approach for Blackheath could be prepared through the neighbourhood planning process.	No change.

			• Reduce rat running. • Plant more street trees. • Protect the historic fabric. • Promote improved energy efficiency in historic buildings, conservation areas and housing stock.		
Environment Agency	3	LEA Site allocations	**Lewisham East Area feedback** *LB Lewisham officer note: Table of sites with water management information included in original representation.*	Noted. The site allocations have been reviewed and amended to provide additional information on water management, in line with the information provided by the EA.	Local Plan amended to refer to water management in relevant site allocations.
Grove Park Neighbourhood Forum	3	LEA Para 16.4	Agree that the dominant roads are generally poorer in public realm. However, we'd like the Local Plan to note that along both Burnt Ash Road and Baring Road there are large very mature trees which line certain sections of these roads, and these need to be recognised, celebrated and protected, as it's their only good quality.	Noted. The draft Local Plan policy GR04 Urban greening and trees is considered to provide strong policy protection for trees. The details suggested for inclusion are captured in the recently Grove Park Neighbourhood Plan, which has now been 'made' and forms part of the Council's development plan.	No change.
Grove Park Neighbourhood Forum	3	LEA Para 16.8	Welcome the aim to deliver the vision set out in the neighbourhood plan in relation to the proposed 'urban national park'. We'd like this paragraph to expand this point, recognising that this will bring forward a 'district' level park in an area that is deficient, to realise and maximise the beneficial use of existing Metropolitan Open Land. This should also link to the proposal 21 that was set out in Government's Landscape Review 2019, which welcomed new landscape approaches and the ideas of how connected green and blue spaces across large areas can embody the idea of urban national parks as a concept. However, being in supporting text only does not adequately provide the mechanism to realise this vision. Therefore, it should also be better reflected in Policy LEA3.	Noted.	Revised text added to reference the Council's ambition to create an integrated district park.
Grove Park Neighbourhood Forum	3	LEA Key Spatial Objectives	Objective 3 should clearly state the aim to deliver the green infrastructure-led renewal of the local centre (in line with the Grove Park Neighbourhood Plan) and a new district park on Metropolitan Open Land. The park is the defining feature of the neighbourhood that will support existing and new communities arriving as a result of intensification of redevelopment sites in the town centre.	Noted.	Revised text added to reference the Council's ambition to create an integrated district park.
Grove Park Neighbourhood Forum	3	LEA Figure 16.2	In the previous table, objective 6 as well as clause D of policy LEA1 it states that Baring Road will also be transformed into a healthy street. This is not reflected in the map on Fig 16.2..	Noted. The Healthy Streets Approach is intended to apply to all streets, in accordance with the London Plan. The East Area section makes clear the Healthy Streets Approach will be advocated on the A2212. Fig 16.2 does not highlight all streets which have been identified as a focus for the Healthy Streets Approach, rather it reflects on those streets which are 'growth corridors' identified in the spatial strategy Policy OL1 - the A2212 road is not such a corridor.	No change.
Grove Park Neighbourhood Forum	3	LEA Figure 16.2	Amend Fig 16.2 to include the Grove Park Town Centre as a healthy street, as part of the redevelopment of the centre	Noted. The Healthy Streets Approach is intended to apply to all streets, in accordance with the London Plan. Fig 16.2 does not highlight all streets which have been identified as a focus for the Healthy Streets Approach, rather it reflects on those streets which are essential to the delivery of the spatial strategy.	No change.

Grove Park Neighbourhood Forum	3	LEA Figure 16.2	This area is about enhancing the Green Infrastructure Links, and therefore the map should better communicate this, by mapping all the key parks, MOL, and GI.	Noted. A balance needs to be struck regarding the clarity of the diagram and an excess of information. We have grey-scaled the base map in order to highlight the key principles for the sub area.	Local Plan amended to ensure the base map has all key open spaces illustrated.
Lee Forum	3	LEA	Lee Green specific 3. We request that the council conduct a Detailed Area Strategy SPD for Lee Green to provide more detailed guidance about how policies in the Local Plan will apply for the Lee Green district centre as a matter of urgency. With three large site allocations at a congested and polluted junction in Lee Green it's essential that transport, infrastructure, public realm and design are planned for holistically, not in a piecemeal fashion.	Noted. The preparation of SPDs is outside the scope of the Local Plan and the current consultation. We note the request and will give this due consideration. There are many areas across the Borough where significant growth is expected. Preparing SPDs for all of them will be challenging given the Council's budget pressures and current resources.	No change.
Lee Forum	3	LEA Site allocations	Lee Green specific 4. Since the three large site allocations at Lee Green significantly increase height and density in the area, quality of design is essential. The site allocations should include much more detailed design guidance around how to build sensitively in a heritage rich, conservation area recommended area, including e.g. step downs in height to respect local heritage, maximum heights, appropriate materials, massing and articulation.	Noted. The draft Local Plan policies in the Part 2 Sections on High Quality Design and Heritage must be read together with the site allocations. The Local Plan is a strategic document and the Council needs to carefully consider the level of detail provided for sub-areas and site allocations. A more granular approach to site design could be prepared through the neighbourhood planning process.	No change.
Lee Forum	3	LEA	Lee Green specific 7. Lee Green is poorly served for bus routes to Greenwich Peninsula and Greenwich village. A local consultation has been carried out and found that should such routes be put on that many more people would choose to take the bus rather than drive there, improving active travel. We would like to see the aspiration of these two bus routes included specifically in the Lee Green section of the plan.	Noted. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. Specific contributions to transport, including local bus routes etc. will be negotiated through S106 agreements with the developer. The Council will continue to work with and lobby the London Mayor and Transport for London for improvements to bus services.	No change.
Lee Forum	3	LEA Section 06	Lee Green specific 8.Lee Green is unusually rich in heritage. We suspect this point can get forgotten because it's heritage is split between two boroughs, both of which hold separate lists of Lee Green's heritage. We therefore request that this rich heritage is recorded holistically and clearly in the local plan so that developers might plainly see it. Specifically please show on the map the locally and nationally listed buildings shown here. *Officer note: Representation includes a map of heritage assets.* Please also mention that most of Lee Green has already undergone a conservation area assessment by [name removed], the Mayor or London's heritage officer, and include a link to his recommended conservation area boundaries in the local plan, which can be found here.	Noted. Planning policies within the Local Plan only cover areas within the Lewisham borough boundary. However, the Council has been liaising with the Royal Borough of Greenwich to inform the preparation of the Local Plan and fulfil its statutory Duty to Cooperate. The draft Local Plan Part 2 policies on Heritage seek to ensure that development proposals preserve and enhance the significance of heritage assets, and require applications to submit a Heritage Statement. The level of detail and cross boundary nature of the heritage assets could be captured in the emerging neighbourhood plan for the area.	No change.
Lee Forum	3	LEA	We support the key spatial objectives on page 635 but it is unclear how they are to be translated into reality when development takes place.	Noted. The spatial objectives are expanded on in the subsequent place principle policies for the East sub-	No change.

				area, which will be used to assess planning applications.	
Lee Forum	3	LEA	Almost the entire row of buildings on north side of Eltham Road and Lee High Road and up Lee Road in Lewisham and Greenwich are locally listed with Lewisham and Greenwich councils. Two buildings are Nationally Listed Grade II (The Fire Station and Old Police Station) The entire Lee Green town centre, excluding Sainsburys, Penfolds and Leegate, was recommended to become a conservation area by (name removed) in 2019, highly respected heritage advisor to the Mayor of London (see his Seven South London Town Centres Heritage Report). Lee Neighbourhood Plan echoes this and the policy has been highly popular at public consultation. This information should all be repeated in Lewisham's Local Plan	Noted. The draft Local Plan Part 2 policies on Heritage seek to ensure that development proposals preserve and enhance the significance of heritage assets, and require applications to submit a Heritage Statement.	Local Plan amended to refer to historic character of Lee Green in East sub-area section on Context and Character.
Lee Forum	3	LEA	On a scale of 1-6 Lee Green has a relatively low Public Transport Accessibility Level of 3. It is cut into four quarters by polluted and congested A and B roads. It is not close to a train station and no proposals for transport improvements have come forward.	Noted. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The Council's Local Implementation Plan (LIP) sets out further information on local area projects and investment to support the London Mayor's Transport Strategy.	No change.
Lee Forum	3	LEA Site allocations	Lee Green is not identified as an area for intensification in Lewisham's Local Plan and for that reason none of Lewisham's planned Infrastructure Levy spending is planned for Lee Green. Lee Green is not allocated any spending for new schools for example, despite the proposed Leegate having over 450 units it and Lee Green having several more large site allocations in it. 450 housing units is more than the Leybridge Estate has. Yet when the Leybridge Estate was built Brindishe Lee was built to educate its children. By what mechanism can we expect Lee Green's infrastructure to be improved to accommodate the several thousand new residents planned for Lee Green?	Noted. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. Specific contributions to local areas will also be negotiated through S106 agreements.	No change.
Lee Forum	3	LEA	We've no doubt developers will try to say that distinct and well designed tall buildings can support place making, act as focal buildings that support legibility and wayfinding and contribute to the character and identity of new quarters. Saying it doesn't make it so: There is no evidence people are struggling to find their way around Lee Green or that Lee Green is not already rich in character.	The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
Lee Forum	3	LEA Site allocations	Sites 3 to 7 are in within the Lee Forum boundary and the descriptions for these site allocations need to align with the Lee Neighbourhood Plan site allocations. If not, developers will not know which one to follow. Whilst there is a good deal of commonality they are not exactly matched. We ask the Council to adopt the Lee Forum site allocations as it is to be submitted shortly, once Lee Forum is redesignated, as there are key elements missing from the council's site allocations which have already been	Noted. Neighbourhood plans are required to be consistent with the strategic policies set out in the Local Plan. Neighbourhood plans can provide policies and guidance which are additional to those set out in the Local Plan. In preparing the draft Local Plan the Council has had regard to the Lee Neighbourhood plan.	No change.

			approved locally through advanced consultation. The Lee Neighbourhood plan is now close to adoption.		
Lee Forum	3	LEA IDP	Lee Green specific 5. Lewisham's (2015) Infrastructure Delivery Plan is included in the evidence base of its local plan. It states that Lee Green's population is expected to grow by 670 people by 2033. For this reason no infrastructure improvements are planned for Lee Green. Yet its estimated Galliards proposal of 630 new homes will bring around 1700 new residents and the other 4 site allocations in Lee Green will bring an estimated 6000 new residents. The non site allocation but large Eurocar site on Lee High Road is currently preparing to make an application to build new housing as will other sites in Lee Green. Bringing non site allocation and site allocation development together, it's estimated Lee Green's population may increase by 7000 people during the life of the plan. The Local Plan says The IDP will be subject to regular review and updating over the plan period. We request that a promise of this be reiterated in the Lee Green section of the plan to reassure the community given that the current IDP is particularly out of date as regards Lee Green.	Noted. Following the Regulation 18 consultation, the Infrastructure Delivery Plan has been revised to include the latest GLA population projections on a ward by ward basis. The Council has engaged with key stakeholders to consider the updated projects and input into the IDP, where appropriate.	Infrastructure Delivery Plan amended to include latest GLA population projections, and project lists updated to take account of these, where appropriate.
Lee Manor Society	3	LEA QD 04	An important driver of the plan is the council's desire to provide sufficient **housing** and the need to meet the London mayor's plan housing targets. This can conflict with local character which is for low-to-medium rise buildings in many parts of the borough. Approvals for **tall buildings** up to 30 or 35 storeys in central Lewisham have created canyons and overshadowing in the town centre and an unattractive street-level atmosphere. We do not want to see this approach extended to other parts of the borough – our specific concern is with the Leegate redevelopment – where it is even less appropriate with a proposed 15 storey 'signature' building overwhelming the modest crossroads. Many high-rise developments of the 1960s (rising to much less than 30 storeys) proved unsuitable for family occupation and – just 60 years on – are being demolished. We note that Robert Jenrick, secretary of state for housing, has issued a direction regarding Policy D9 Tall Buildings to ensure such developments are only brought forward in appropriate and clearly defined areas.	Noted. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The London Plan includes detailed design requirements for tall buildings, which the draft Local Plan proposes to take forward along with additional local requirements.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
Lee Manor Society	3	LEA	**East Area** It should be made clearer that the proposals are aspirational because there is already widespread concern that the plans are already agreed.	Noted. The purpose of the Local Plan and the process for preparing the plan is set out clearly within Part 1 of the Main Issues and Preferred Approaches document.	No change.
Lee Manor Society	3	LEA	**Lee Green**. The Plan recognises that this, one of the smallest district centres, has poor quality public realm and is dominated by busy roads and a busy road junction. It speaks of a hope that the proposed redevelopment of **Leegate** could provide 'a catalyst for renewal, making Lee Green vibrant, more welcoming and accessible.' (p633 para 16.7). It speaks of addressing 'the dominance of vehicular traffic at the main junction.' (p635). It is difficult for us to see how traffic can be much reduced at the junction even if London-wide proposals for Low Traffic Neighbourhoods are pursued. The Eltham Road/Lee High Road corridor will	Noted. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The Healthy Streets Approach is established by the London Plan and includes a wide range of measures and interventions, the specific nature of which will be considered on a case-by-case basis. The Council will	No change.

			remain busy. It is not clear in the Plan to see how these roads could be transformed into 'healthy streets.' The answer, we suggest, is to move the traffic-free hub of Lee Green some 50 yards to the south combining public space in a redeveloped Leegate with a redeveloped **Sainsbury's site** on the west side of Burnt Ash Road. The latter should also include a decently sized public square with expanded pedestrian links further west to Brightfield Road and Hedgley Street. (p658 et seq.). The design and potential height of the development needs to be handled sensitively because the site abuts the **Lee Manor Conservation Area** immediately to the west. This would leave the north side of the Lee Green junction (p659) cut off from the south. But a public path/square running alongside the river Quaggy on the car salesroom site and a public space on Osborn Terrace overlooking the Quaggy to the east of Lee Road (requiring cooperation with Greenwich borough) would go some way to pedestrianizing the north side and re-integrating the two sides of Lee Green. We support the Plan's proposal for mixed use, including housing, on the car showroom site and improvements in access to the Quaggy. Unfortunately extending a path along the Quaggy as far as Lee Road will need creative solutions because the Lee Road shops run right up the bank of the river.	continue to work with and lobby Transport for London to deliver investment in support of this approach. The site allocations for the Lee Green centre sets out requirements for public realm and access improvements, which will be considered through the site masterplanning process. These comments will be forwarded to colleagues within the Council's Highways service.	
Lewisham Cyclists	3	LEA Key spatial objectives	Page 635 Key Spatial Objective 6 in the main document refers to "transform the South Circular (A205, Baring Road) and Lee High Road (A20) into a Healthy Street". We would suggest the wording of this is altered to "adopt the healthy streets approach along the A205, Baring road and A20 corridor" and encourage the planning team to follow TfL guidance on this which is clear and unequivocal. This should also form part of the strategic planning document for the whole corridor, and form conditions of planning along the corridor, including CIL contributions to part fund improvements.	Noted. Planning conditions attached to consents will be determined on a case-by-case basis. These are outside the scope of the Local Plan.	Terminology for Healthy Streets Approach amended as suggested. Local Plan amended to refer to London Cycle Design Standards.
Lewisham Liberal Democrats	3	LEA	Lib Dem response to Lewisham Local Plan (with specific reference to the East area) The Lewisham Local plan is fundamentally a plan to build more housing, with aspirations to improve retail outlets, enhance the environment (including access to the Quaggy), protect (but not increase) green spaces and to offer community /cultural /work spaces so that more facilities are provided locally. In order to produce a healthier, safer environment for us all, it also promotes cycling and walking, wants to improve the areas around train stations, and proposes to create 'healthy streets'.	Noted.	No change.
Lewisham Liberal Democrats	3	LEA	• Two of the buildings in the borough which are going to be demolished and replaced by residential accommodation are a **hostel** and a respite centre. What alternative arrangements are being made for their clients?	Unclear which buildings are being referred. Current planning applications are outside the scope of the Local Plan. The draft Local Plan sets out requirements dealing with re-provision of specialist accommodation.	No change.
Lewisham Liberal Democrats	3	LEA	• We are told that '**Blackheath Village district centre** will build on its unique qualities as a visitor destination with a vibrant night time economy',	Noted. Blackheath's designation as a District Centre has been carried forward from the adopted Local Plan and assessed against a defined set of criteria. Its	No change

			but have residents been asked whether or not they would like this increase in footfall and noise at night?	designation as a night time economy area 'of more than local significance' is established by the London Plan. The suitability of appropriate uses within the town centre will be assessed against relevant Local Plan policies. Both the adopted and draft Local Plan include policies dealing with the protection of local amenity.	
	3	LEA Leegate	The thought of Sainsbury's and the BMW site being developed to be part of the high rise development just adds to the existing issues.	Noted. The indicative site capacities are not predicated on high rise development. They have been set using a standard methodology, which is in line with that used in the London Plan Strategic Housing Land Availability Assessment. Further details are set out in the Council's Site Allocations Background Paper. The site capacities will however represent a step change in density from the existing character. The Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	No change.
	3	LEA Leegate	The London Plan and Lewisham's response are quite clear that Lee Green should not qualify as a Tall Building area. There is no evidence to change this.	The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA Leegate	Local residents and trades people are fully aware that the Lee High Road is heavily congested and polluted for large parts of the day and significant junctions such as Lee Road/Burnt Ash Road are heavily over used. This has of course been exacerbated by the introduction of the Low Traffic Neighbourhood. To build along the routes seems to be a folly: it will create homes in the air that are less polluted but their tenants will contribute, towards making those on a lower level even more polluted than they are now.	Noted. Low Traffic Neighbourhoods are outside the scope of the Local Plan. Your comments will be forwarded to colleagues in the Council's Highways service.	No change.
	3	LEA Leegate	Part of any plan should look at the refurbishment of the accommodation between Lee crossroads and Lewisham. The properties are already poor and will be made worse	Noted. The nature of this comment is too detailed for a strategic policy document.	No change.
	3	LEA Leegate	It was interesting to read the logic behind the building of Brindishe Lee School which clearly failed because of the size of the catchment area. This proposed development will need a new school on the same side of the road. With the increased intensity of traffic it would be un reasonable to ask families to cross the main roads.	Noted. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.
	3	LEA Leegate	The plans need far more detail to be taken seriously. We need to be able to see the reality of proper infrastructure: Schools, play space, leisure facilities, Medical provision (GP, health centres, chemists etc.)	Noted. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate	No change.

				the level of growth anticipated through the Local Plan.	
	3	LEA	I note the vision in the various documents about the Plan. REVIVING HIGH STREETS Lee Green will once again become a focus for community activity and the shops and commercial space will be enhanced to serve the local neighbourhood. Leegate Shopping Centre and other town centre sites will deliver new genuinely affordable homes and workspace. Reducing the dominance of vehicle traffic at the main junction, will allow further improvements to public space in the town centre. Re-establish Lee Green district centre as a welcoming and thriving hub of commercial and community activity. Deliver public realm improvements and high quality, mixed-use developments through the renewal of Leegate Shopping Centre and other town centre sites. Address the dominance of vehicular traffic at the centre's main junction. I like the sound of the vision	Noted	No change.
London Wildlife Trust	3	LEA 01	We support these principles, especially in respects of Parts J and L.	Support noted.	No change.
	3	LEA 01	**States there will be "intensification of sites.....on Baring Road from Grove Park Station to Heather Road/Bramdean Crescent** There needs to be clarity regarding which sites would be deemed appropriate for intensification as these are not highlighted under site allocations and there is no way of scrutinising the intentions behind this principle or determining its consequences. This stretch of Baring Road includes some extremely important local facilities and buildings including: **Ringway Community Centre and gardens.** The Ringway Centre, gardens including the wooded area should be better protected from development. The gardens need to be recognised as community gardens. The historical importance of the house at the Ringway Centre as a base for activism against inappropriate development in London should be noted and the house locally listed. If the proposed road structure had not been defeated there would have been significant impacts on communities and neighbourhoods along the proposed route. The campaign reflected an era dominated by the car and large road infrastructure projects taking precedence which is in direct opposition to current thinking and of interest in the development of public attitudes and political direction. Please see: https://www.roads.org.uk/ringways **Napier House TA Centre.** Napier House should be locally listed and protected against inappropriate development.	The Local Listing process is outside the scope of the Local Plan. Buildings can be nominated for Local Listing however. Please see the council website for details. The Local Plan provides policies to protect open space and biodiversity sites. The intensification along strategic corridors refers to brownfield / previously developed land, not open space and ancillary facilities.	Local Plan amended to provide clarification on approach to intensification within this area.

			This general principle of intensification could see sections of housing demolished to create inappropriate higher/denser development - especially close to the Grove Park Local Centre this could seriously affect the open 'village' feel and give a sense of enclosure.		
	3	LEA 01	LEA1 - A c) p637 and p653 - 656 I agree the Lee Green Centre needs support. The carpark site needs regeneration. However, the car cleaning business is really important for the area and well used. This should remain in some form or another and I'd like to see this business and the people it employs protected as a regular visitor to the car wash site. The Yoga House London Studio is important for the local area and one I use - how will Lewisham protect or offer an alternative site for the yoga space if the centre undergoes renovation. Will it still have the same rent if a new building is placed on that site? Will the rent be controlled for a long period of time to ensure that the studio isn't pushed out of the area by rising/recoupment of building costs? Will the same be true for the Faction Bookshop and Rhubarb and Custard Cafe? As these are key things I and other local residents want to keep not to be displaced in the Local Area Plan. How will Lewisham Council partner and preserve these key businesses for our local area? How far will the renovations on this site go? Will they stretch as far as the row of shops on Burnt Ash Road (Leegate House)? As this is where I do my weekly shop in the SWOP market. This is a key aspect of my day-to-day life it has a huge positive impact on Lewisham (the shop owners won the Mayor's Enterprise Award) and on the environment, reducing my carbon footprint through reducing the plastic I use. Arts Network is also a great local charity and there is a grocer that supplies SWOP. Will these sites be protected/supported as above? Could the grocers be expanded to provide plastic free fruit and veg (so missing from the area? Could there be a space for a weekend market? (The local pizza van at Hither Green Station could come, as could the German Sausage van if it could be spared from Lewisham market one day!) This would be such a huge improvement for the local community. Could the wetherspoons be kept in some way but given a new modern and outdoor space? D p637 I agree with the improvement of the roads including the A205 and A20. Flower Pots	Any future application for Leegate will include non-residential floorspace and a re-location strategy for the existing businesses. The Council's Economic Development team will be heavily involved in this process and will seek to retain as many viable local businesses as possible. Flower pots are outside the scope of the Local Plan but we will pass your comments on to the Transport team. With regard to the suggested road improvements we will pass your comments on to the Transport team.	No change.

			However, I am concerned about approaches to these. The introduction of flower pots across South East London has made driving incredibly difficult for me and has increased the pollution my car has given out. I have the smallest car and engine possible and only use the car when I have to, but with friends in Peckham, Herne Hill and Brixton the alternative is three lots of public transport and a journey exceeding an hour and a half rather than a 20-minute car journey. The layering of flower pots on flower pots has made it so incredibly difficult and a labyrinthine approach to getting to even my most simple of drives. To give one particularly horrific example, I had a recent cancer scare where I had to drive to Lewisham Hospital to get a scan. The journey should have lasted 12 minutes. It lasted an hour and a half and I was late for my scan. You can imagine the mental strain of having to do that alone in a pandemic, regardless. Add blocked off roads around Manor Park which meant I couldn't get through to Lewisham High Street to get to the hospital as each way I turned was blocked off. Add turning back to go down the South Circular to try going that way to find back-to-back traffic all the way passed Lee station back to the South Circular and all the way to Hither Green Lane. And then add all the closures on Hither Green Lane to Lewisham High Street. I have never been so stressed in all my life. I am pro-environment but the emissions and traffic I have seen every day show this is not working. This is more likely to drive me out of London than stop me using my small, energy efficient car to make journeys I can't make by ill-connecting cross-town South London public transport. Burnt Ash Hill / South Circular The crossing at Burnt Ash Hill where it intersects the South Circular is incredibly dangerous. When I moved here there were no traffic lights or place for pedestrians to cross. There are now traffic lights but these have caused additional dangers to crossing the road safely. 1) If crossing to go towards Lee Station down Burnt Ash Hill, the lights never turn green across the whole road. This means as a pedestrian, in order to not spend a large amount of time waiting at the crossing most people run in the shortest of spaces between the lights changing or when only one lane is turning round the corner from BAH onto the A205. This is incredibly dangerous and more often than not people get caught out. The lights need to be green for pedestrians to cross the whole of the South Circular not just half of it at the time. 2) The area in the middle has been given a lip of concrete which is a serious trip hazard as no-one follows the path laid out by the initial improvements apart from prams. It's just not human behaviour. This way you have lots of people walking over a three inch plus lip every day, often in a hurry to catch the brief moment they can run across the road in one go. It's dangerous.		

			3) The staggered traffic light on the corner of BAH and A205 (I'd say North East?) actually makes it more dangerous for people to cross. If you'd previously been running across while the light was red for the cars on the South Circular now you have the added complication of the cars that would be turning from BAH getting stuck at that staggered traffic light. So now you are stuck between cars stopping for the traffic light, oncoming traffic from BAH while trying to run quickly before the light changes. It's a nightmare. All of this could be avoided by sending someone to see how local people use the crossing at peak morning, evening and an off-peak time before putting in these changes. It is no less dangerous to cross this road now, it's just dangerous in different ways caused by the improvements. I'd also say that during lockdown, I've made less and less of an effort to go down Lee High Street. This is 1) because of the high levels of active begging outside of the Coop and 2) because of the dangerous crossing. F, G & H - I'm a frequent visitor and orderer of Brockley Brewery on the Chiltonian Estate. It has a taproom which is tucked away and underused in the middle of an industrial estate. This seems like such a waste in terms of footfall to the site. In my mind, the garage owned by Travis Perkins on the corner of Holme Lacey and Burnt Ash Hill Road would be much better purposed as a public-facing brewery opposite Lee Station or a multi-purpose site with a Brockley Brewery and other bars/shops/butchers/greengrocers than it will ever be as an extension of Travis Perkins' timber yard (which already has an entrance less than 5 mins walk from BAH). Imagine the increased business, jobs and look of the area of a local brewery with a high street facing taproom than an extended entrance to a specialist merchant site that not many local people use. This is a local business that is underutilised and known about. It could do with some council support and a better site. BAH crossing in front of Sainsburys. It is difficult to access the shops on Burnt Ash Hill and Lee Gate House. There is a crossing at the crossroads (but not much there) and a crossing at the corner of the Sainsbury's and the wetherspoons but many people try to cross the road right in the middle from the Sainsburys exit to the SWOP shop. It would be much easier to cross safely if a pelican crossing was put there or the crossing across BAH was moved further down BAH to opposite the Sainsbury's.		
Blackheath Society no 2	3	LEA 01	**LEA1 East Area place principles**. The mixing of statement of general principles and application of principles to specific centres is unclear, scattered and confusing. As a result, no clear, coherent and unique vision for each centre emerges. See specific comments below for how this affects the Blackheath District town centre.	Noted. Lewisham's East Area comprises of Blackheath, Lee and Grove Park and as such the vision and policies for the area straddles these three areas. Nevertheless there are a number of references to the spatial qualities of Blackheath and specific place	No change.

				policies relating to preserving and enhancing the distinctive qualities of Blackheath Village.	
Blackheath Society no 2	3	LEA 01	We see **LEA1 East area principles** B, C and H as crucial to preserving and enhancing the wider setting of Blackheath, but are disappointed that there is no mention of reducing the traffic problems of the area that impinge on the walking and cycle environment and public realm, as mentioned specifically in D in relation to the A205, Baring Road and Lee High Road in the Lee neighbourhood.	Noted. The borough-wide policies address reducing car use and public realm enhancements.	No change.
Grove Park Neighbourhood Forum	3	LEA 01	Clause M of Policy LEA1. Typo, refers to north area, but should read East Area.	Noted.	Point M has been deleted as a repetition from points covered elsewhere.
Lee Manor Society	3	LEA 01 LEA 02	Suggestions are made in the Plan to 'naturalise the **Quaggy** river'. We support this idea but wonder how it can be achieved in the built-up townscape along its path in Lee. (p639 -L and 640 -F). Public space, as suggested above, at the car showroom site and Osborn Terrace could include more natural banks to the river.	Noted. Whilst river naturalisation, and particularly deculverting, may be difficult to achieve in some areas the Local Plan ambitions and policies will be the starting point for discussions with developers. Where the Council considers that river enhancements can be feasibly delivered, requirements have been set out in the site allocation policies.	No change.
Lee Manor Society	3	LEA 01	The Plan suggests a more prominent role for what it calls the **Burnt Ash local centre.** We assume this to mean the shopping parades to the west of Burnt Ash Road between Southbrook Road and the railway line and to the east of Burnt Ash Hill between the railway line and Our Lady of Lourdes Catholic church. The shops on the Burnt Ash Hill side have a run-down appearance, narrow pavements and unnecessary 'anti-pedestrian' railings at some points. We welcome any attempt to improve this area which includes the approaches to Lee station.	Noted.	No change.
Lewisham Cyclists	3	LEA 01	LEA1 East Area place principles; In order for the council to meet Policy TR3 in the East area, LEA1 sections D, G and K need to state the requirement for public realm to be provided with the Healthy Street approach adopted throughout the corridor from Blackheath Village, via Lee Road, through Lee Green junction, along Burnt Ash Road and Baring Road up to and including Grove Park town centre.	Noted.	Local Plan supporting text amended to strengthen and make clear this objective in terms of implementing the Healthy Streets Approach.
London Wildlife Trust	3	LEA 02	We support this policy in respect of Part F.	Support noted.	No change.
	3	LEA 02	LEE GREEN ROPOSED DEVELOPMENT: It seems to me that Lewisham needs to take a look at what Greenwich is doing: only building eco-friendly homes; structuring the new builds taking into account the local environment - green spaces/ trees/ etc. Looking at the result of Lewisham's building policy around and near the station, nothing could be more hideous, less people-friendly or less environmentally responsible. You are at the moment creating the slums of the future. I know you are instructed to build x-number of homes but you have to find far more innovative & creative ways to do so. It's your job to do so.	Noted. The draft Local Plan is considered to set out a positive strategy for managing future growth and development across the Borough, consistent with the Good Growth policies set out in the London Plan, and the principles of sustainable development set out in national planning policy. The draft Local Plan introduces a significant step-change from the adopted Local Plan on policy approaches across a number of policy areas such as design quality, climate change mitigation and adaptation, and sustainable transport.	No change.
	3	LEA 02	Dear Sir/madam	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to	No change.

			I am appalled at the changes suggested at Leegate. 15 stories for the tower blocks is too high in a residential area such as Lee where we suffer from daily traffic jams. What's more what are you thinking of at the plans to build further tower blocks on the Sainsbury site and the garage space on Lee high Rd. - another heavily congested area. All this building, if it happens will add to the very poor air quality in the area, second only to Greenwich as being one of the most polluted areas in the country.	express their views on the scheme through the Development Management process.	
	3	LEA 02	We write with reference to the planned development at LeeGate. We are very concerned to see the density and sheer amount of housing that is planned for this area by Galliard homes. We are very concerned at the proposed height of these blocks and tight density of the buildings in this area. We think this will have a negative impact on the aesthetics of the local area. We cannot understand how Lewisham Council can sanction this when there is no existing building at this height around locally. We are extremely concerned about the prospect of more housing in this area without the needed infrastructure to support an increase in the local population, medical needs and education to begin with. We are also very concerned at the impact this would have on the local traffic situation, which is already diabolical, in light of so many of the local roads being closed off. We would like these plans to be withdrawn and reconsidered. Also for them to be put out for proper public consultation so that as local residents we are consulted properly. We believe that any new housing must not exceed that of the existing flats in this area. We also feel there needs to be much work done to improve the infrastructure of the area. We wish to be kept updated with all developments with this proposal.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The Local Plan consultation is being carried out in accordance with the Council's adopted Statement of Community Involvement (SCI).	No change.
	3	LEA 02	I welcome the proposal to develop Lee Green. However, the plans are not appropriate for the area for the following reasons - the height of the proposed buildings is not in keeping with the area - road traffic will only get worse. Eltham road is already congested and the size of the proposed development would make this worse I would also like to reiterate the importance of having local shops on the ground floor of the proposed developments.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The draft Local Plan site allocations for the Lee Green centre seek to ensure that for mixed-use developments main town centre uses are retained or re-provided at the ground floor level.	No change.

			The area needs amenities. A large supermarket with parking access also needs to be maintained		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I have read the plans for Lee Green and surrounding area and would like to express my absolute objection to what is being proposed. My reasons are as follows. I totally disagree with the height of the buildings on the plans. Lee agreed is a small community area and should not become dominated by such huge buildings that will Have very densely populated accommodation. They are way too high and it would totally block out the sky line and make the area very overpowered by huge buildings. It totally unsuitable for such a small area. I understand the need for increased b b housing in London , but this has to be balanced with sensible developments that do not impact negatively on people's lives. The proposal stated 450 more housing units. How is the local area going to cope with such an increase? With not enough amenities to meet the needs of all the people who would then be living there. Where are the schools and doctor surgeries that Would be needed to accommodate all these new residents. Increase in through traffic to an already car heavy main road. This would be Unsustainable if you introduce more residence on that scale into the area. There has been no local consultation People who live here were fully involved. Last time when St. Modwen were proposing new buildings for the Lee gate space. All local residents must be consulted, I live very close to the proposed site and this Will affect my life hugely.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within the Local Plan we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am shocked to learn that Lewisham Council might approve the plan proposed by Galliard Homes for Leegate. This plan includes 15-torey high blocks. This is a monstrous development for Lee Green, if allowed by Lewisham Council. The highest building currently in Lee Green is 10-storey. What about schools and medical services for such a development? Don't children and families in this proposed development need such services?	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	As a resident of Lee Green, I was very very concerned to see the new proposals relating to Leegate. Whilst there are some positive aspects to the plans - particularly the 'green' aspects of the proposals and the plans for public spaces - there are several other elements that will be severely damaging to the local area. My main concerns are: 1. **The height of the proposed buildings**. The illustrations of the development illustrate very graphically how out-of-keeping the buildings will be with the rest of the area. The nearest tall buildings are I believe 10 storeys high - I feel	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

			very strongly that this new development should not be allowed to exceed that height. 2. Related to this, the proposed increase in **the amount of accommodation** will add a very large population to the locality and it is not clear how this will be assimilated by local services (such as health, education and transport). 3. The document has reassuring words about limiting the amount of parking, but it seems very clear that adding such a large increase to the population of the area, will inevitably lead to **a large increase in the number of cars on the roads locally** and can only add to the already over-whelmed traffic lights at Lee Green - particularly at a time when the Council have introduced a LTN locally in an attempt to deal with the large volumes of traffic going through the area. Whilst there is an urgent need to address the situation on the site at Lee Green, I hope the Council will ensure that these grotesque proposals do not proceed in their present form.		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I object to the proposed plan which is too ambitious and will ruin the identity of Lee green and ignores the listed buildings and dwarfs them impacting on the light for current residents. The density is a concern there already has been too much development putting demand for the local infrastructure and this plan will triple it. The proposed plan for building so high will ruin the sky line. The 15 storey high is exceeding maximum local height by 37%. This must be reduced and kept in line. 450 homes is far too high this needs to be reduced to at least 250 and 75% help to buy or similar. Young working people are struggling to buy homes this needs to be addressed. I oppose the current plan and will be taking this further.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am writing to express my concerns on the proposed development of leegate by galliard homes. I am concerned about over development, density and the impact on infrastructure and services namely Lewisham hospital which is already over stretched and under resourced and would like to know how Galliard homes propose to mitigate against this with the increase of people in the area?	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I live at SE12 0PH I and many others believe you should add a Lidl and 1 fast food restaurant or cinema to make it better maybe a VUE cinema or Mac Donald fast food restaurant. A Lidl will be much appreciated.	Noted. The draft Local Plan makes provision for a wide range commercial uses to locate within town and local centres, including supermarkets and restaurants. However, the plan cannot make requirements for particular businesses or commercial operators.	No change.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	If Lewisham Council had the gumption, and it must be said the money given the way central government has starved local authorities, it would have compulsorily purchased this site (if it does not already own it) and built what the area actually needs - a decent state secondary school - either to	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

			replace or extend nearby Trinity, which has to do its best on an entirely inadequate site in nearby Taunton Road. The proposed redevelopment exists solely to meet targets and make money for the council and developer. It shows no consideration for the local community, who will be negatively impacted. I have seen the proposed development by Galliard of the Leegate Centre site. Whilst the decrepit, redundant Leegate Centre should have been replaced many years ago, it must not under any circumstances be with this development. It is completely out of scale with the surrounding area, and will bring the soulless banlieues of Lewisham Way to a new outpost on the Lee High Road, where once established, we can expect a multiplier effect with similar proposals for the Sainsbury's and BMW sites. I would want to know much more about how the local infrastructure of roads, schools, medical facilities etc., already under pressure, will be supported to sustain a development on this scale. If Lewisham Council had the gumption, and it must be said the money given the way central government has starved local authorities, it would have compulsorily purchased this site (if it does not already own it) and built what the area actually needs - a decent state secondary school - either to replace or extend nearby Trinity, which has to do its best on an entirely inadequate site in nearby Taunton Road. The proposed redevelopment exists solely to meet targets and make money for the council and developer. It shows no consideration for the local community, who will be negatively impacted.	As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I would comment on the Local Plan/plans to build new homes in three locations including the Leegate Centre, BWW garage on Lee High Road and Sainsbury's Lee Green as follows: Amenities/traffic – Sainsbury's in Lee Green. It is a good local supermarket in a residential area that serves the community well. Local residents often walk or cycle to Sainsbury's in Lee Green or use the buses 178, 122, 202, 261 and 321 to reach the supermarket. I often see elderly local residents using the bus to take a short ride to the supermarket. If it was too closed it would mean that local people would need to travel further to larger supermarkets using cars to travel longer distances, increasing traffic pollution and congestion in the local area. Employment - Sainsbury's provides employment for many local people.	Noted. Much of this response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The draft Local Plan site allocations for the Lee Green centre seek to ensure that for mixed-use developments main town centre uses are retained or re-provided at the ground floor level. The allocation for the Sainsbury's site will enable the retention or reprovision of the supermarket on site. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update

			Density – If the current level of housing is to be increased in Lee Green, then a corresponding increase in infrastructure, such as schools, traffic congestion and pollution, doctor surgeries, and transport (trains, buses, cycle lanes) is required. Planned infrastructure improvements for Lee Green should be explicitly named in Lewisham's Local Plan. It is troubling that the Leegate Centre, Sainsburys and BMW garage could be built upon to provide more housing when doctors surgeries, school places, public transport etc. are already oversubscribed. As a local resident of Lee Green, parent of school age children and frequent bus user overcrowding on buses at peak times is very unpleasant and stressful. It is difficult to get local children into local schools, an increase in homes would increase demand for school places. As a primary school teacher in the local area, I am well aware that local children sometimes have to travel great distances to get to school because they were unsuccessful obtaining a place in the area, despite having named several local choices on their list. Height of buildings - The maximum height of any new buildings should be no taller than the current buildings on the sites of Leegate, Sainsburys and BMW garage. A 15-storey building would be entirely out of keeping with the area. I would want this maximum height for Leegate, Sainsburys and BMW garage sites to be included in Lewisham's Local Plan. Housing - I would want the Local Plan to explicitly state that any new development on the sites in Leegate, Sainsburys and BMW should not just be studio or 1/2-bedroom flats but would be a mix with family suitable homes (3 bedrooms). Affordable homes for families and key workers should be a priority. On the 12th of March 2021 mayor Sadiq Khan confirmed plans to prioritise key workers for new build intermediate-level affordable homes. I would want the Local Plan to state that there must be significant green and public spaces in any development of Lee Green, including Leegate, Sainsburys and BMW. In December 2020 a coroner made legal history by ruling that air pollution was sadly a cause of death of a 9 year old girl, who was resident in the local area. Failure to reduce traffic pollution levels and increasing demands on local services could again see a similar tragedy occurring. Illegal and toxic air pollution is a public health crisis for all.	requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The draft Local Plan Part 2 policies on Housing set out the Council's objectives around genuinely affordable housing, which are in line with the London Plan. It is acknowledged that the plan could provide more details around housing size mix, informed by needs identified in its Strategic Housing Market Assessment. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The Part 3 East Area policies include additional details, including requirements for public realm enhancements in the site allocations. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I appreciate you've received a few of these by now, but as a resident of Leyland Road, SE12 8DT I wanted to add my voice to the below. TLDR version: Broadly think the Local Plan sounds great.	General support for Local Plan noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

			Definitely want to see the Leegate centre redeveloped, but unlike the last round of the plans from St. Modwen (which seemed reasonable) the most recent proposals from Galliard feel a bit extreme in terms of density and height. Hoping this is the opening move of their negotiation strategy, rather than a proposal that's being seriously considered. The Leybridge estate height feels like it should become the maximum, but also not the norm across the development.		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I live in SE13 5QL postcode, a 10-minute walk from Leegate. I a m very concerned at talk of 15-storey tall buildings. In my opinion, this would genuinely ruin the area. Whilst I am disappointed that it is taking years to sort out the mess that Leegate has become, and I recognise that there is a shortage of housing in Lewisham borough, I feel that anything higher than eight or maybe ten storeys would be detrimental to the locality. Tidied up, I see this area as potentially having a village feel, but if a very tall building goes up - followed by others, no doubt - then this area will become uglier and a place no-one will want to visit or care much about. There is huge potential to make the Leegate development a real asset that people want to visit; a "windy city" ambience is not wanted. Also, I feel very strongly that, whatever happens, Sainsburys must continue trading and not close - should building plans make this preferable. Please note what happened in Burnt Ash Lane, Bromley, when Waitrose shut down - for a few weeks, supposedly - and Lidl took over a year to open its new store, leaving vulnerable people high and dry. I know the circumstances are very different but plans can change. This sort of behaviour - where customers are treated badly by supermarkets - cannot be allowed. I have previously taken a keen interest in the original plans for re-development, attending presentations and talking to the planners. I hope that we will be kept informed about plans. I don't like to be cynical but I also hope that Covid-19 is not used as a handy excuse to plough on without consulting the local population who care very much about their neighbourhood.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The draft Local Plan site allocation for Sainsbury's Lee Green, LEA SA04, will enable the retention or reprovision of the supermarket on site. The Local Plan consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement.	No change.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. It is very important that the Centre is redeveloped into a good shopping and social meeting area with new housing as well but as a local resident I do have some major concerns about the current proposals being developed by Galliard Homes which I will outline below. I understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other and	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. East Area site allocations development guidelines amended to refer to Grade II listed fire station and local listed Old Tigers Head.

			enhance the whole area. The Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. However, I have major concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. I think the Local Plan should set a10 storey maximum height limit for any single building planned for the Lee Green area and also state an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. Very tall buildings would make the area unwelcoming and unattractive and deter people from using the shops and facilities being planned for the site. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will need to respect the proportions of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures of their proposed Leegate development. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities which will be especially needed by older people when shopping etc.	The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The site allocations require that the sites are re-integrated with the surrounding street network and take account of locally listed heritage assets. Each application will be considered serparately, taking into account its surroundings.	
	3	LEA 02	Lee Green Development Area This area is already far too busy with traffic. It would be good to put right the buildings opposite the fire station but not to increase the population by adding more buildings.	Noted. The draft Local Plan must set a positive framework for managing growth and development in order to meet identified local needs, consistent with the National Planning Policy Framework. The amount of development sites and growth planned for the East area is relatively limited when compared to the North, Central and South areas of Lewisham. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan	No change.

				requirements in terms of housing targets and making best use of available land within the capital.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	Lee Green Development proposals The emerging Plan from the Leegate pre consultation is not in line with Lewisham council's 'Draft Local Plan.' Density and height are out of proportion to infrastructure. Mass and bulk proposed which is up to 15 storeys is out of proportion to the setting of the local area. The plans also suggest additional areas which will be encompassed in the future plans. i.e. Sainsbury's, the BMW garage at Lee Green etc. without setting a clear limit of height, bulk or density. The plan does not currently explain Lewisham's budget or infrastructure improvements necessary to support the proposed additional housing. As residents of and contributors to the local community we would ask that the following is considered and is written into the Local plan prior to acceptance of planning permission. 1) Maximum height for Leegate centre to be in accordance with existing buildings and reflected in the plans and within the Lewisham local Plan rules. 2) Maximum height of other buildings to be introduced to Lee Green is no higher than the existing 4 storey Victorian buildings on Lee High Road. 3) The development rules are fixed in terms of mass, height and density for all Lee Green surrounding areas so that creeping high rise sprawl is avoided within the area. 4) The development takes into consideration and sets out the infrastructure improvements that are required. Lewisham council sets out how they will fund this with clear plans and time scales. 5) Lewisham sets out a plan for how the green space behind Eltham Road to the north side can be used to facilitate increasing levels of population, whether this area forms Parkland for use by the whole community. We really need the support of our local council and must be able to trust them to ensure that our local area is not ruined by their lack of foresight or planning and non-adherence to their own policies	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. Any planning application that may be submitted for the site will be assessed against our adopted Development Plan. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA 02	Large increases in housing need corresponding increases in infrastructure. The resulting development of the three sites at Lee Green would need an increase in the provision of schools, particularly local primary schools, doctors surgeries, hospitals, transport, parking and children’s playgrounds.	Noted. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update

			The Lee Green development will have a big impact on the lives of the local residents and we would like the planned infrastructure developments for Lee Green to be explicitly named in the plan. The current transport links and other infrastructure would not support such the proposed development. The development of tall buildings such as the ones proposed at Lee Green would a hostile environment with a wind tunnel effect. These are not developments that are for families but dormitory accommodation for a more transient population. The development around Lewisham station is proof of that. We should be making new developments more human and people friendly. Lee Green has a community feel and any new developments should be on a low level fitting in with the area that exists. Developments should include play areas and open spaces, small shops and doctor's surgeries, a new primary school. Developments should build a community not a dormitory. Buildings at Lee Green should be no higher than 10 stories with lower level buildings and space between. This height should be written into Lewisham's Local Plan to ensure developers cannot exceed that limit or try to sneak higher developments through at a later stage in the planning, as nearly happened with the development of the Catford Dog Track.	The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. It is very important that the Centre is redeveloped into a good shopping and social meeting area with new housing as well but as a local resident I do have some major concerns about the current proposals being developed by Galliard Homes which I will outline below. I have major concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high (!) which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. The new housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. I believe very strongly that the Merridale flats at the top of Carston Close should not have their view obscured or their sunlight blocked out by tall buildings. Also, tall buildings would make the area unwelcoming, unattractive and deter people from using the shops and facilities being planned for the site. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will need to respect the proportions of the local area and not create the highrise blocks of parts of	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The Local Plan is a strategic policy document and the Council needs to carefully consider the level of detail provided for each area within the site allocations. Further detailed guidance at a masterplanning level would normally be undertaken as part of a Framework Document or Supplementary Planning Document (SPD).	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			Kidbrooke Village and Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures of their proposed Leegate development. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities for residents and people when shopping etc. There are not enough school places for children in the borough of Lewisham as it is! I understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other and enhance the whole area. The Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head.		
	3	LEA 02	I have read some of the plans for Leegate and the Lee Green area and have several concerns: 1) no new buildings directly on the Lee Green crossroad or the 3 sites of interest should be above the height of the local historic buildings e.g. the Old Tigers Head and the Fire Station. 2) any buildings should be sympathetic to the original style and feel of Lee Green. 3) the density of housing should take into account the limited capacity of local schools, for parking, and transport services. Over populating the area will have serious consequences if these are not in place first. 4) the council should be careful not to set precedents which will blight planning and the quality of life in the area for years to come	Noted. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The draft Local Plan Part 2 policies on High Quality Design and Heritage seek to ensure that development proposals respond positively to local character, along with preserving and enhancing the significance of heritage assets. These policies must be read in conjunction with site allocation policies.	Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station.
	3	LEA 02	LEA2 - Lee Green district centre and surrounds An extract from the draft is as follows: "There is significant potential to reinforce the role of Lee Green District Centre through targeted renewal. It contains a number of sites, including the Leegate Shopping Centre, whose comprehensive redevelopment will significantly enhance the place qualities of the centre whilst delivering new housing, improved retail provision and community facilities. They should also deliver a complementary mix of uses, including new housing, whilst ensuring that the centre's predominant commercial and community role is maintained and enhanced".	Noted. Much of this response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The draft Local Plan Part 2 policies on High Quality Design and Heritage seek to ensure that development proposals respond positively to local character, along with preserving and enhancing the significance of	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			There are three significant sites identified at Lee Green: Leegate, Sainsbury's and BMW. When all are developed the character of Lee Green will be radically altered. While the district centre undoubtedly requires improvement it is vital that Lewisham Council ensures all three schemes are in accordance with the wording of the draft Plan: "Development proposals should respond positively to the evolving urban scale and character of the town centre and its immediate surrounds. Development should be designed to provide for an appropriate transition in scale, bulk, mass and height between the centre, its edges and surrounding residential neighbourhoods." However, while supporting the principle of these words, I am concerned how developers will be held to account in terms of implementation, especially as the Leegate proposals are already in the development pipeline and will set a precedent for the other sites. The Leegate Environmental Impact Assessment screening and scoping report submitted to the Council in March 2020 already prepares the way for buildings of 16 storeys and up to 486 dwellings, albeit as a worst case development scenario. Both figures exceed the current proposals and suggest the developers will push for taller buildings and an increased intensification of housing which is unacceptable on a site less than 2 hectares and will set a precedent for the other development sites. The tallest buildings in the vicinity are c11 storeys, to go up 16, even at the junction of Burnt Ash Lane and Lee High Road, is excessive and is not in keeping with the scale of the surrounding low rise neighbourhoods to the west and north, or with the rest of the junction with the two Tiger Heads buildings. The Local Plan should be clear on the maximum height appropriate for each of the three development sites at Lee Green and not allow these to be exceeded. It should also set maximum acceptable density levels for each site. High density need not necessarily mean high rise development and the density and building height limits are both critical information. Nevertheless, the redevelopment of the three sites is to be welcomed as long as they add amenity value and are implemented with regard to the local neighbourhood. The BMW site should be required to open up and improve the River Quaggy. All three sites should be required to included retail and commercial space at the ground floor in order to encourage active frontages on this busy pedestrian intersection. Despite the impact of COVD on retail, it is important that Lee Green remains, and is encouraged to be an improved local retail centre. The addition of c 600+ residential units on the three sites will mean that shops will be more viable and local residents, as now, will walk from Blackheath and Manor House to use them. Loss of shops and any food retail would mean increased driving to supermarkets causing more congestion. Lewisham should ensure appropriate local retail and commercial provision at Lee Green is retained in the Plan.	heritage assets. These policies must be read in conjunction with site allocation policies. The draft Local Plan site allocations for Lee Green centre will enable provision for a wide-range of main town centre uses at the ground floor level with residential above. They also require significant public realm enhancements to be delivered to support the centre's vitality and viability. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	

	3	LEA 02	Solving the Tigers Head crossroads: Traffic and better pedestrian crossings linking all 4 sides of the junction Lee Green and particularly the Tigers Head Junction are extremely dangerous and awkward to navigate as a pedestrian. I have frequently encountered cars running the Red lights and travelling across the pedestrian crossings when the Green Man is showing. This is due to a tight junction which is barely possible to turn right/left without running the red lights. The junction takes a long time to cross and usually requires a wait in the central reservation surrounded by heavy goods traffic and idling vehicles. It is essential to the local area that this junction be made pedestrian friendly and also easier for vehicles to navigate without driving dangerously. As it stands, I avoid crossing this junction with a pushchair and use businesses further away with easier access.	Noted. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The issues around traffic, movement and safety in the area (particularly around the junction) are recognised, and the site allocations for Lee Green require that development proposals deliver significant public realm enhancements to help address this. The Council will continue to work with and lobby Transport for London to deliver improvements in the area. These comments will also be forwarded to colleagues in the Council's Highways team.	No change.
	3	LEA 02 LEA SA 03	I was so disappointed to learn from BetterLee Green that the consultation period is very short indeed, so proper consultation is not being facilitated by the council. Additionally such a disappointment to see that the development proposals for Leegate are again totally disproportional to the space and location. The Galliard plan is much more intensive and less green as well as fewer spaces for public than even the first St Modwen proposal which the local BetterLeeGreen community fought so hard to get amended, with the support of Lewisham council officials who listened. The amended version was much better on all accounts with no unneeded supermarket and more green and public space. There should be limited developments of green sustainable flats but focus on local amenity shops, workshops, and open spaces. It's been shown that the area is highly polluted. New the even taller high rise buildings shown in artists plans will exclude light as well as trap the traffic pollutants within enclosed buildings.. The development should go no higher than it currently is, unless an entirely green design, and should be improved to include much more greenery at ground level, Ideally keeping all the mature trees while greening up the public square. It is so ironic that Lee Green, the first area in London reached on the A20 from the M25 which sounds so green, has no connection to its name or history, although the development of Leegate offered the chance to rectify this with a green outdoor area. Lewisham council listened to the community with the St Modwen proposal making them amend their initial design on these points. Why are they ignoring all the community requests made at the time in allowing anything like the new proposal? The standards	Noted. The Local Plan consultation was carried out in accordance with the Council's adopted Statement of Community Involvement. The consultation ran for roughly a 12-week period, well over the statutory minimum 6-weeks. Much of this response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The draft Local Plan includes provisions around urban greening and green roofs, open space and biodiversity. Please refer to Part 2 policies on Green Infrastructure. Air quality is addressed in the Part 2 policies on Sustainable Design and Infrastructure.	No change.

			approved before ought to be the minimum standards and even more requested from Galliard. It is known affordable homes are needed but many of those proposed won't be affordable, but solely creating profits for Galliard without improving local amenity and communal space! In these covid times not only is the importance of green space as opposed to flats with no access to greenery known to be harmful for mental health, but the demand for them is decreasing as people with cash to invest in property are moving out of London. Additionally the inevitable result of people working from home much more, there will be even more empty former office spaces - it is these that should be converted into the needed affordable homes. Please use joined up thinking and look at quality of life for local communities which has been so important in lockdown, and halt the relentless flat building for investors with reduced quality of life for locals. The new Lewisham centre including the new roundabout is now so dense with high apartments that lack of light and green space will be the main problem for any new occupiers. And fewer post-Covid will find the main benefit to be buying there to commute into London via the train service on the doorstep. It has been shown the main priority during And post Covid times is likely to be properties with gardens or green space not the former closeness to public transport as working patterns will be changing forever. Please take on these issues and don't make the same mistake at Lee Green. And finally most importantly please ensure any new developments, apart from essential outside quality spaces, also have green roofs and green walls beneficial for biodiversity, air quality, and quality of life for residents which has been long proven beneficial. Please make the developments necessary be models of what can be achieved as opposed to repeating the same mistakes which are now completely out of date with modern life and sustainability, and connection to our living planet. Present these as minimum standards to developers like Galliard whose main aims are making short term profits regardless of quality of life for the future community and urban biodiversity.		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. I also understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury. It would be helpful to have some firmer guidance in the Local Plan to ensure that all	Noted. Much of this response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			these sites are developed in ways that link up with each other and enhance the whole area. The Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. I have major concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. I think the Local Plan should set a 10 storey maximum height limit for any buildings planned for Lee Green so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. This would make the area unwelcoming and unattractive. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a vibrant community centre and parking facilities especially needed by older people when shopping etc.	As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. The Local Plan is a strategic policy document and the Council needs to carefully consider the level of detail provided for each area within the site allocations. Further detailed guidance at a masterplanning level would normally be undertaken as part of a Framework Document or Supplementary Planning Document (SPD). The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	
	3	LEA 02	Additionally if 630 new homes are to be developed at Leegate (and presumably with more to follow at Sainsbury's and the BMW garage once they are redeveloped) where is the infrastructure that will be needed? The local primary and. Secondary schools don't have capacity, more doctors surgeries will be needed and the transport links at Lee and Hither Geeen are over-crowded during non-COVID times and do not have capacity for many more additional commuters. The traffic is already a nightmare around Lee and the extra demands on the roads (many of which are closed off under the healthy neighbour scheme) both due to works vehicles during the development stage and then from the increased density once the housing is built will result in constant traffic jams. The intersection by the Tigers Head is a nightmare now with traffic going from the A2 to Lewisham constantly blocking the box junction and making it difficult to travel from Lee to Blackheath.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. Any major application that is submitted to the Council must be accompanied with a comprehensive Transport Assessment, and will be assessed against the existing Development Plan policies.	No change.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I would comment on the Local Plan as follows: • Density - if the current level of housing is to be increased in Lee Green, there needs to be a corresponding increase in infrastructure, such as schools, doctor surgeries, and transport (trains, buses, cycle lanes). I would want planned infrastructure improvements for Lee Green explicitly named in Lewisham's Local Plan. I am not happy for Leegate, Sainsburys and BMW garage to be built upon more intensively in order to include more housing.	Noted. With regard to density and the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Local Plan housing policies amended to include a target housing size mix.

			• The maximum height of any new buildings should be no taller than the current buildings on the sites of Leegate, Sainsburys and BMW garage. I would want this maximum height for Leegate, Sainsburys and BMW garage sites to be included in Lewisham's Local Plan. • I would want the Local Plan to explicitly state that any new development on the sites in Leegate, Sainsburys and BMW should not just be studio or 1/2 bedroom flats but would be a mix with family suitable homes (3 bedrooms). • I would want the Local Plan to state that there must be significant green and public spaces in any development of Lee Green, including Leegate, Sainsburys and BMW.	The draft Local Plan site allocations for Lee Green centre make provisions for public realm enhancements, including new publicly accessible open space. The draft Local Plan Part 2 policies on Housing set out the Council's objectives around genuinely affordable housing, which are in line with the London Plan. It is acknowledged that the plan could provide more details around housing size mix, informed by needs identified in its Strategic Housing Market Assessment. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Local Plan about the issue of the future development of the Leegate Shopping Centre. It is important that the Centre is redeveloped but as a local resident I do have some concerns about the current proposals being developed by Galliard Homes. I understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other and enhance the whole area. The Plan need to state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head.	Noted. This initial comment seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The draft Local Plan Part 2 policies on High Quality Design and Heritage clearly set out that development proposals must respond positively to the site context, including local character. The plan must be read as a whole.	Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station
	3	LEA 02 LEA SA 03	I will focus my comments on one area and that is the proposals for growth in Lee and specifically the Lee Gate centre. I welcome the regeneration of this site, being under utilised and not hugely attractive. I am supportive of mixed use development, of medium to high density, however the resulting density would need to respond to the existing surrounding context which, apart from the neighbouring point blocks of Leybridge Court Estate, is predominantly low to medium rise development and the PTAL of this area is only a 3. The outline proposals from Galliard, look somewhat blocky and the neighbouring Leybridge Court should not be the only reference point for character and height. The height of new proposals should be determined through design, but I would consider that heights in any redevelopment proposals to be a maximum of 8-10 stories and these would need to be carefully integrated and respond to the	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			wider townscape. Whilst this important junction can take some increased development, this is an opportunity to mend the urban fabric and reinstate a more in keeping street and perimeter block layout, which would integrate this currently isolated site much better into the surrounding area and be more in accordance with its previous historic form, prior to the 1960s development. Redevelopment to higher densities here would require careful consideration of enhanced infrastructure, in particular, public transport and active travel improvements would be required, (further roll outs and public realm improvements of the LTN would be supported as s106 contributions) and car parking standards would need to be extremely low or even car free due to the existing junction being likely near to or at capacity and enhanced walking and cycling facilities to neighbouring main line rail stations would be beneficial for new residents and the existing community. As part of the mixed use space, it is considered that some community uses should be included. Supportive of new housing with affordable and a good proportion of family housing.	Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. It is very important that the Centre is redeveloped into a good shopping and social meeting area with new housing as well but as a local resident I do have some major concerns about the current proposals being developed by Galliard Homes which I will outline below. I understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other and enhance the whole area. The Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. However, I have major concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. I think the Local Plan should set a10 storey maximum height limit for any single building planned for the Lee Green area and also state an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from	This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The draft Local Plan Part 2 policies on High Quality Design and Heritage clearly set out that development proposals must respond positively to the site context, including local character. The plan must be read as a whole. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			these areas. Very tall buildings would make the area unwelcoming and unattractive and deter people from using the shops and facilities being planned for the site. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will need to respect the proportions of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures of their proposed Leegate development. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities which will be especially needed by older people when shopping etc.	facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Local Plan regarding the future development of Lee, particularly Leegate Shopping Centre. It is very important that the Centre is redeveloped into a good community area for local businesses to have affordable rent and new housing. As a neighbouring resident, I'm raising concerns about the current proposals suggested by Galliard Homes. Lewisham Council is planning to develop three sites:- The Leegate Shopping Centre, The BMW garage, and Sainsbury's. Guidance in the Local Plan doesn't ensure that all these sites are developed in ways that link up with each other and enhance Leegate. The Plan should state clearly that new developments in the area must fit in with existing older buildings at the Lee Green Cross Roads. These buildings average two storeys and have a maximum height of four storeys. They include a Grade ll listed fire station and a locally listed Old Tigers Head pub. The River Quaggy alongside the BMW site and the back of Weigall Road playing Fields is opened up with access for all as nature is very important for people's health. The work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee. My main concern is the planning of up to 630 new homes, their height and the infrastructure regarding them in Lee.	Noted. The Local Plan is a strategic policy document and the Council needs to carefully consider the level of detail provided for each area within the site allocations. Further detailed guidance at a masterplanning level would normally be undertaken as part of a Framework Document or Supplementary Planning Document (SPD). Much of this response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. When a planning application is submitted for any of the 3 sites within Lee Green a comprehensive Construction Management Plan will need to be submitted, and assessed by the Council to minimise disruption. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements	Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			The proposed height of the new buildings in the Leegate development by Galliard Homes, is I proportional to existing buildings and the current structure. Their proposed block heights will reach 15 storeys high, which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - they are 10 storeys high. Any new Local Plans should set a 3-storey maximum height limit for any single building planned for the Lee Green area. It should also state an expectation that most new housing developments should be in keeping with existing buildings of 3-storeys. This will ensure public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings, overcrowding and helps to ensure safety. Tall buildings reduce natural light in surrounding areas - may I see a light study test please? Very tall buildings will make the area unwelcoming, unattractive and deter people from using the shops and facilities being planned for the site. With up to 630 new homes, this increases crime and shall place a big burden in already over-subscribed services such as schools, GPs and hospitals. Most trains do not run very frequently and most mornings (prior to lock down) it was impossible to fit into an overly crowded train carriage. The amount of new people into Lee will place a burden on services. How is the building work, particularly large lorries, gas and electrical digging, going to affect local residents? With Local roads closed off and traffic congestion, particularly school runs, this is going to exasperate traffic standing still and poor air quality. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. Developments need to respect the proportions and community feel of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities which will be especially needed by older people.	etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	We have read the plans for developing the Leegate site and as very longterm residents in the local area would like to offer the following comments 1. Further development on the Leegate site (and possibly later also the Sainsburys and BMW sites) should be permitted. But NOT to 15 storeys in height. The maximum height should be 10 storeys, as on the neighbouring Leybridge Estate.	Noted. Much of this response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			2. There should also be the return of the short line of small shops along Burnt Ash Road which were demolished when Sainsburys was built. The loss of some Sainsburys parking could easily be compensated by Sainsburys' huge underground car park. This half-dozen small shops would help to return the 'town-centre' feel to Lee Green, which has been lost in recent years, and is clearly featured in 20th century photographs of Lee Green. 3. If the target of 600+ new housing units is to be pursued (and these homes may well be needed), it is essential that expanded education, health, and transport and parking provision is built into the development plan.	Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03	I have been made aware of the latest plan for the development of LEEGATE, which is directly adjacent to where I live, in Burnt Ash Road, SE12 8RF. Local neighbours have drawn up a response (we were given just 2 days to respond – not very long at all.) I agree with every single point made in this response, which comprises 5 paragraphs, and is regarding the 3 sites mentioned in the Plan, the past good development of the River Quaggy, the height of the proposed buildings (15 storeys high(), and the necessity of infrastructure to support the massively increased housing here. I will therefore not repeat what has been written to you, as I support all of it. I do want to stress that I am most concerned about the height of the proposed housing – 15 storeys is totally out of keeping with this Lee Green area - the highest building at present being 10 storeys high; and parking. Parking here is nearly impossible at present. And while the demolition and building is progressing, it will be totally impossible, as a large car park will be demolished. After completion, where will the new owners/tenants park? I am pleased that Leegate is to be dealt with, after all these years of dereliction, but fear what the new development is going to look like, and how very crowded this area will then be. I have lived here since 1943, with the exception of about 5 years in Brockley, so I remember what Leegate looked like before the shops were demolished and the current (now empty) buildings erected.	Noted. Much of this response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am horrified by the local plan in respect of the proposal that the Leegate centre, the Sainsbury's site, and the BMW site should be targeted for high rise flats densely populated offering low quality Homes. The high-rise building that exists at the Lee gate centre has always looked out of place, is an eye site and overly high in comparison to the surrounding older buildings which are much more in keeping with Lee Green. Our feedback to the Lee forum was that we wanted the area to improve not go further downhill.	Noted. With regard to densities and the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. With regard to access to public transport we appreciate that Lee Green is not Lewisham and as such the densities of site allocations have been reduced to reflect the hierarchy of centre.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			Why is the council putting forward a proposal to denigrate where we live? Why are your expectations for our community so low? Why doesn't the local plan focus on infrastructure improvements, amenities improvements, safety improvements? Lee Green is not Lewisham. It does not have hundreds of buses. It does not have multiple trains every hour going direct to multiple London destinations. It does not have a DLR or underground station no are any of these things likely to come to Lee Green based on the councils total Phalia in this area over the last 25 years. Given TfL's plans for reducing the quality of the Lee train service (i.e. to remove all direct trains to London Bridge forcing everyone to change at Hither Green) the idea of adding so many extra homes is ludicrous. The current residents of the existing high-rise buildings rely extensively on cars due to poor public transport. Where will all the extra cars go? The triangle of roads formed by the South circular Burnt ash Road and Eltham Road are already congested and the pollution has already killed one little girl. How does this plan in any way support the reduction of traffic pollution or the encouraging of cycling? The focus should be on building homes with each one having some private outdoor space (garden, decent balcony). Human beings need access to outdoor space. One would've thought that the pandemic would've shown you the importance of individual outside space. Why does the Lewisham plan persist in a development approach which has already been shown to damage both the mental and physical well-being of its residents? We don't want mass produced low-grade ugly housing forced on us. Nobody wants to live in a rabbit hutch or rely on dirty unsafe elevators to reach their homes. Where in the local plan don't you give any consideration to the safety of the residents? How many women will be attacked on their way home into these high-rise monstrosities? How many will be too many? Come on Lewisham raise your game. Lee and Lee Green already have some really lovely independent shops in the Lee gate centre and the surrounding area. We do not want chain stores selling cheap (because they rely on child labour and cheap labour from abroad) products which do not last.	With regard to car use the London Plan sets out targets for 90% of all trips in inner-London to be made by sustainable modes by 2041. As such all new development will be car-free or car-'lite' with minimal parking to discourage car use. The draft Local Plan takes forward the London Plan housing design standards, including for outdoor amenity space. We do not agree with your characterisation of new development within Lewisham. With regard to policies on improving access to green spaces please refer to draft Local Plan Part 2 on Green infrastructure. With regard to policies on sustainability please refer to draft Local Plan Part 2 on Sustainable design and infrastructure. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	

			This is Lee Green not Lewisham. The two locations are very different. Why doesn't the local plan include introducing a large green? It is after all Lee Green. The densification of the Lee gate centre with any green area above ground level being invisible to local residents/users of the Lee gate centre is unimaginative and suggests a lack of diversity in the team. I am against the proposal to build 630 homes at the Lee gate centre. I am against the proposal to build high rise flats all the way around the Leegate centre. I am against the proposal to turn Sainsbury's into another high-rise monstrosity. I see nothing in the plan that shows you have integrated The need to create an environment which is safe for women at all hours of day and night whether they are out socialising or travelling to and from work. I see nothing in the plan that promotes individual and community well-being through the increasing of green spaces which are accessible by all and through the development of homes which allow the residents the dignity of having some individual private outside space. I see nothing in these proposals to indicate you have taken any account of the need to reduce pollution nor to increase the safety of cycling or indeed to improve public transport links for Lee Green and Lee. In summary the local plan shows you haven't listened to local residents at all.		
	3	LEA 02 LEA SA 03	I understand that we can write to you with comments on the Galliard Leegate development plans. Please see my comments below. Whilst I am supportive of new housing I have serious concerns about the height of the proposed development. Galliard Homes are proposing building up to 15 storeys high, exceeding maximum existing local height by 37%. This is far too tall and will drastically change the feel of the area which has locally and nationally listed buildings which are much smaller. The galliard homes should be no taller than the existing leegate Centre. Allowing Galliard to build at 15 stories would also set a precedent for developers wanting to redevelop the Sainsburys and BMW sites, who would think they could also exceed existing local height by 37%. I am also very concerned about the lack of infrastructure locally for all of these new homes. Where will this be	Noted. Much of this response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.

			funded from? If the Sainsburys and BMW garage sites are developed to similar density as Galliards proposed Leegate plans, demand for local infrastructure will be tripled. There must be adequate additional schooling, transport and Nhs services provided for all of these new homes.		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I have looked at the 3 areas designated under this plan, namely Leegate, Sainsbury's and the car dealers all of which appear to be scheduled for demolition. This would appear to be a very long, noisy, dusty project whether taking the whole area or one section at a time, rather ironic in view of all the road closures in the area to improve air quality. There are also the problems of already being a very busy traffic junction before the increase in vehicles to the building proposals is taken into account, a terrible wind corridor with many umbrellas lost each year (which will be exacerbated due to the height of the new buildings) and depreciation of the surrounding properties, both by lack of privacy and noise pollution. Just look at how long the building works by Lewisham Station/Loampit Vale have taken under the Regeneration project of 2000 (?) and still the chicken boxes continue to be built along that road. How many storeys high and percentage of affordable/social housing are also ongoing issues at Lee - we all know now that developers' put down the percentage necessary to obtain planning permission which is removed to a token when building commences (due to increased costs not previously factored into the calculations!)..... On a more practical note, I do hope a supermarket provision with parking will remain throughout or the 'new' one will lose a lot of trade by people having changed habits over a period of deprivation.	Noted. If and when a planning application is submitted for any of the 3 sites within Lee Green a comprehensive Construction Management Plan will need to be submitted, and assessed by the Council to minimise disruption. The draft Local Plan sets a strategic target for 50% of new homes to be for genuinely affordable. The percentage of affordable housing approved at the planning stage is agreed within a legally binding S106 agreement. We are not aware of any development in Lewisham where this legal agreement has been breached. Draft Local Plan Site allocation 4 Sainsbury's Lee Green includes the requirement for main town centre uses, which could accommodate the re-provision of a supermarket.	No change.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	Employment Leegate – 570m2 currently with 36 homes and capacity for approximately 500 FTE jobs in retail and offices Sainsbury – 500m2 currently no homes and approximately 200 FTE jobs in retail BMW site – 230m2 currently no homes and capacity for approximately 20 FTE jobs in retail and industrial Schemes that have been considered by the council for these sites all put at risk all of the actual and potential employment on these sites. Leegate applications made by, and discussions with, St Modwen and, more recently, Galliard have had ever decreasing space for employment opportunities. The draft Plan says "re-establish Lee Green district centre as a welcoming and thriving hub of commercial and community activity" but the talks with Galliard recently make no indication of this commitment by	Noted. Much of this response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The draft Local Plan Part 2 policies on High Quality Design and Heritage clearly set out that development proposals must respond positively to the site context, including local character. The plan must be read as a whole. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local	Local Plan Part 2 policy on High Quality Design amended to refer to building to a human scale as a design principle. Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			the council. The draft Plan also says the council will "introduce stronger protections for employment sites, so they remain in business use" but the Galliard proposals indicate that the council have no intention of keeping to this principle either. The other two sites (Sainsbury and BMW) have never had any residential use so the only protection for the 220 FTE jobs is in the draft Plan principle that would "enable the mixed-use redevelopment of some sites for new workspace and housing - but only where there is no loss of business space". It appears that the Galliard Homes proposal is allowed to play the trump card of "1,667 new homes a year" that allows all other considerations being ignored – height, bulk, employment, heritage, density. Heritage and local character The area around Lee Green often falls outside the narrow definition of "heritage" but its 20th century heritage of interwar housing, neighbouring early Conservation area, post war developments (Leybridge Court, residential infill and early shopping centre) give the area a special "heritage". The Leegate Centre as well as the Sainsbury and BMW site contribute to that mixed local character. Encapsulating the rapid expansion and development of the twentieth century within a small space shared with much older buildings and a major junction of the A20 arterial road. The close proximity to the significant Leybridge Court Estate (and later Millford Tower) along with an example of a very early (1970s) Conservation Area (Lee Manor) and high quality interwar development of the Crown lands of Eltham Palace make this a special place. The Quaggy River, along with its culverted tributaries, are testament to both Lee Green's more ancient past and its future potential as a cultural and bio-diverse centre. The Leegate Centre is an eyesore. But this is the fault of the recent owners. A much smaller investment could revive the shopping centre as an employment hub for local people, a cultural centre, contribute to the successful retail District Centre and could even accommodate more homes. It appears that the Galliard Homes proposal is allowed to play the trump card of "1,667 new homes a year" that allows all other considerations being ignored – height, bulk, employment, heritage, density. Tall buildings and bulk I would echo an answer given on Commonplace regarding the height of new buildings at Lee Green District Centre: I am also worried that there is no mention of building to human scale, with generous public realm, set-backs and articulations to reduce any sense of scale. I would like all these details spelled out in policies and site allocations Here is the kind of text I would like to see included (taken from Hounslow's Great Western Corridor Masterplan and	Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	

			Capacity Study 2019) “Where the height differential between areas with different height approaches is more than two storeys, the abrupt change in height creates an imbalance and breaks the coherence of the urban fabric’’. ‘’Higher development may feel domineering and undermine the integrity of buildings with lower height’’. ‘’Generally heights should overcome strong height differentials through the stepping down of development at the interface with public realm’’. ‘’Buildings may have one or two set-back storeys behind the main frontage. Due to their limited visibility from the street space set-back storeys have little impact on the perceived building height or enclosure of the street space’’. ‘’The approach is to promote mid-rise buildings rather than very tall buildings, as they will be better able to avoid or limit harm to heritage assets’’. ‘’There will be occasions where a tall or bulky development of a certain scale is simply unacceptable due to the potentially destructive effects on the setting of heritage assets’’. ‘’The higher a building, the greater will be its propensity for harm, fuelled by developer ambition rather than any genuine pressing economic, regenerative or environmental driver’’. I would also like to see this kind of wording from Historic England's Tall Building guidance included in Lewisham's Local Plan ''There will be some locations where the existing qualities of a place are so distinctive or sensitive that new tall buildings will cause harm regardless of the perceived quality of the design'' and that ''conservation area appraisals identify areas of increased sensitivity to tall buildings''		
	3	LEA 02	I live in the eastern part of the borough and I am especially concerned about the site allocations in Lee Green (District Centre) and at Lee Station (Local Centre) Note: This area is not called Burnt Ash. Locally it is sometimes called Lee and sometimes called Lee Station – the area sometimes called Burnt Ash is likely to be found somewhere around the top of Burnt Ash Hill. The Chiltonian Industrial Site can only be accessed from Manor Lane and this is not in this Local Centre. These types of error on a local planning document is very disheartening to find as it indicates a poor understanding of the area by officers and/or consultants.	The name Burnt Ash is simply being used to distinquish appropriately between Lee Gate and other areas and references the principle north south road running through it. The naming of Burnt Ash centre is consistent with the previous Local Plan.	Local plan amended to remove reference to Chiltonian Industrial Estate.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I would comment on the Local Plan as follows: • Density - if the current level of housing is to be increased in Lee Green, there needs to be a corresponding increase in infrastructure, such as schools, doctor surgeries, and transport (trains, buses, cycle lanes). I would want planned infrastructure improvements for Lee Green explicitly named in Lewisham's Local Plan. I am not happy for Leegate, Sainsburys and BMW garage to be built upon more intensively in order to include more housing. • The maximum height of any new buildings should be no taller than the current buildings on the sites of Leegate, Sainsburys and BMW garage. I would want this	Noted. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Local Plan housing policies amended to include a target housing size mix.

			maximum height for Leegate, Sainsburys and BMW garage sites to be included in Lewisham's Local Plan. • I would want the Local Plan to explicitly state that any new development on the sites in Leegate, Sainsburys and BMW should not just be studio or 1/2 bedroom flats but would be a mix with family suitable homes (3 bedrooms). • I would want the Local Plan to state that there must be significant green and public spaces in any development of Lee Green, including Leegate, Sainsburys and BMW.	Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The draft Local Plan Part 2 policies on Housing seek that developments provide a mix of housing tenures and sizes. It is acknowledged that the plan could provide more details around housing size mix, informed by needs identified in its Strategic Housing Market Assessment. Given the urban nature of the sites in Lee Green and the need to optimise the use of available land to respond to London's housing crisis it not possible to include significant, large open space – however each scheme should provide adequate public and private amenity space.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	Thank you for consulting on your Local Plan. I see that the plan envisages redevelopment of the Leegate shopping centre and the Sainsburys and BMW garage sites. I appreciate that there are demands to provide new housing across LBL and do not object to this in principle for these sites. That said any development needs to be in keeping with the existing built environment. In particular buildings should be of a similar height to those already in the area. This is mainly low rise residential with the exception of the Leabridge estate where the tower blocks are some 10 storeys high. Ten stories would seem to be a reasonable cap for this part of the Borough. Additionally the Leabridge estate has significant green areas around the blocks so providing a people friendly environment. Any new development should replicate this spacing /density as far as possible. Also the Leabridge estate is set a distance back from the road ways which avoids a canyoning effect. The local plan should include strict requirements about the effect of tall buildings on wind and sunlight. There is not much point having open spaces which are rarely in sunlight and act as wind tunnels. The two listed buildings on the north side of Eltham Rd/Lee High Rd are of 3/4 storeys and their value will be diminished if they are overshadowed by very tall buildings. The plan should address this point with height restriction s of 10 floors. The junction at Lee Green is already very heavily congested. This is often caused by buses stopping to pick up on the southbound side of Burnt Ash Rd (opposite Sainsburys) which creates a back up of traffic across the lights. As part of any redevelopment a pull in for buses should be created on the east side of Burnt Ash road and preserved on the west side. The development should be as car free as possible with no street parking permits being granted. This is reasonable as the site is close to bus links and within walking distance of two railway lines. These	Noted. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. With regard to car use the London Plan sets out targets for 90% of all trips in inner-London to be made by sustainable modes by 2041. As such all new development will be car-free or car-'lite' with minimal parking to discourage car use. The remainder of the comment seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			infrastructure concerns should be explicitly covered in the plan. The cgi images provided in support of development proposals show very heavily massed and tall buildings completely out of character with the local surroundings. The plan should allow for redevelopment with is more sympathetic in style/size/configuration to its surroundings. This should also include the green environment. New developments should not be required simply to improve on the intensity and diversity of wildlife on the site in question but should be required to at least match that of their surrounding neighbourhood. This requirement should be included in the plan.		
	3	LEA 02 LEA SA 03	I have seen some of your proposals for a local Plan and have heard something of the Galliard Homes proposals for the Leegate site, though these last have not been published, still less been the subject of any public consultation. In the light of this we have the following comments : - GENERAL 1. We are concerned that the Council's draft plan appears to give too much latitude to developers in the area around the LeeGreen road junction. It looks like an invitation to excessive development there. 2. We do not want to see a forest of high buildings there which would not be appropriate for the site. Lee Green is not a genuine "town centre", unlike Lewisham; it is more akin to a village centre. The buildings of Leybridge Court provide a misleading comparator. They are well spaced and well set back from the roads and the rest of the surrounding area.We suggest that 10 storeys should be the maximum with any such blocks set back from the roads, with most buildings significantly lower. 3. The potential for very substantial numbers of new housing units would be likely to lead to unreasonable pressure on local infrastructure and community services. For example schools, health and community facilities, traffic and parking.	Noted. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. It is very important that the Centre is redeveloped into a good shopping and social meeting area with new housing as well but as a local resident I do have some major concerns about the current proposals being developed by Galliard Homes which I will outline below. I understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			developed in ways that link up with each other and enhance the whole area. The Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. However, I have major concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. I think the Local Plan should set a10 storey maximum height limit for any single building planned for the Lee Green area and also state an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. Very tall buildings would make the area unwelcoming and unattractive and deter people from using the shops and facilities being planned for the site. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will need to respect the proportions of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures of their proposed Leegate development. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities which will be especially needed by older people when shopping etc.	Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	The emerging Plan from the Leegate pre consultation is not in line with Lewisham council's 'Draft Local Plan.' Density and height are out of proportion to infrastructure. Mass and bulk proposed which is up to 15 storeys is out of proportion to the setting of the local area. The plans also suggest additional areas which will be encompassed in the future plans. i.e. Sainsbury's, the BMW garage at Lee Green etc. without setting a clear limit of height, bulk or density. The plan does not currently explain Lewisham's budget or infrastructure improvements necessary to support the proposed additional housing.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			As residents of and contributors to the local community we would ask that the following is considered and is written into the Local plan prior to acceptance of planning permission. 1) Maximum height for Leegate centre to be in accordance with existing buildings and reflected in the plans and within the Lewisham local Plan rules. 2) Maximum height of other buildings to be introduced to Lee Green is no higher than the existing 4 storey Victorian buildings on Lee High Road. 3) The development rules are fixed in terms of mass, height and density for all Lee Green surrounding areas so that creeping high rise sprawl is avoided within the area. 4) The development takes into consideration and sets out the infrastructure improvements that are required. Lewisham council sets out how they will fund this with clear plans and time scales. 5) Lewisham sets out a plan for how the green space behind Eltham Road to the north side can be used to facilitate increasing levels of population, whether this area forms Parkland for use by the whole community. We really need the support of our local council and must be able to trust them to ensure that our local area is not ruined by their lack of foresight or planning and non-adherence to their own policies.	The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I have recently read of the plans for the development of the Leegate Centre at Lee Green and the potential for development on the current Sainsbury's site and BMW site. This plan is not in line with the council's own 'Draft Local Plan'. 1. The proposal includes 15 storey blocks on the current Lee Green/Leegate site which is 37% higher than the blocks further down Eltham Road. The Mayor of London's planning policy states that tall buildings should only be built in places with transport links and other infrastructure that can support them. Lewisham has already explicitly excluded Lee Green from its Tall Building opportunity areas in its draft Local Plan. Tall buildings are expressly against the wishes of the community in the Lee Neighbourhood plan which has been widely consulted on. The development at the Leegate site should not be higher than it currently stands. 2. The Sainsbury's site and BMW site should be kept at heights of the Victorian buildings that surround them - certainly no higher than the three storeys of the Tigers Head, houses on Lee High Road and the Victorian villas on Burnt Ash Hill. This maximum height needs to be written into the Lewisham Local Plan for certainty.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			3. The creeping high rise sprawl that has occurred at Kidbrooke and Lewisham must be avoided in this residential and historic area. Therefore, the development rules should be fixed in terms of appropriate mass, height and density (see points 1 and 2 above) for all Lee Green surrounding areas. 3. Local infrastructure will not support development at this scale. Two trains an hour have already been cut from Lee Station and (out of lockdown) the trains are packed at rush hour; it is difficult to get on to the packed trains from Lee Station or Hither Green station at morning rush hour or on trains to these destinations from Waterloo or London Bridge at rush hour. Since the implementation of the LTN (much needed), the main roads are extremely congested (even in lockdown and we await to see the increase in traffic on the main roads after lockdown); this obviously has an impact on the length of bus journeys. The local schools are at capacity. It is nigh on impossible to get an appointment at local GP surgeries and the waits in Lewisham A&E are already untenable. I hope that residents can trust the local authority to honour their views and take account of the Lee Neighbourhood Plan	As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. It is very important that the Centre is redeveloped into a good shopping and social meeting area with new housing as well but, as a local resident, I do have some major concerns about the current proposals being developed by Galliard Homes. I understand the Council is potentially looking at three sites to develop, The Leegate Shopping Centre, The BMW garage site and Sainsbury. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other and enhance the whole area. The Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. However, I am concerned about the height of the proposed new buildings. The three blocks of flats on the Leybridge Estate are 10 storeys but one of the proposed buildings will be 15 storeys, a 50% increase in height and far exceeds buildings in the surrounding area. I think the Local Plan should set a 10 storey maximum height limit for any single building planned for the Lee Green area and also state an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided for walking, sitting and shopping would not be overpowered by an	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The draft Local Plan Part 2 policies on High Quality Design and Heritage clearly set out that development proposals must respond positively to the site context, including local character. The plan must be read as a whole. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			array of high buildings which would block out light from these areas. Very tall buildings would make the area unwelcoming and unattractive and deter people from using the shops and facilities being planned for the site. Also, on past research carried out by various groups, the pollution level at the cross roads is many times higher than the European recommended rate and higher buildings will make that worse as will the increase in traffic. Parking on local streets will also cause problems for residents living in the immediate vicinity. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will need to respect the proportions of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures of their proposed Leegate development. It is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre and sufficient parking facilities which will be especially needed by older people when shopping etc.	As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	Lewisham Local Plan Consultation - Leegate, BMW and Sainsbury Development. Regarding the Lewisham Local Plan Consultation any development plan proposals should not include any buildings higher than the surrounding area and should provide local amenities and local infrastructure needed to support increases in population.	Noted. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	Leegate, Sainsbury & BMW development proposal Traffic:- Since the introduction of the current Low Traffic Neighbourhood scheme the current roads, particularly in this area are unable to cope with the filth pollution and traffic jams created. You cannot cycle everywhere and the public transport system is atrocious in south London. People therefore need to use cars particularly the old snd disabled. The current roads can't cope and adding significantly more homes will exacerbate the problem.	Noted. Low Traffic Neighbourhoods ae outside the scope of the Local Plan. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.

			Schools, doctors, hospitals. How many new schools, doctors surgeries and hospital beds are you intending to create? Trying to register at a doctors, find a school place or get seen at a hospital in this area is impossible.		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	As a local resident (SE12 8NU) I am writing concerning the local plan for Lee Green and Leegate. I am very concerned that the three sites in this area not be overdeveloped. Any development on the Sainsbury's site should not exceed the height of the existing buildings adjacent to the site, or the Old Police station. This is also true of the BMW garage site where any new structure should not exceed the height of the Old Tiger's Head and adjacent buildings. On the Leegate site the redevelopment should not exceed the height of the current buildings on that site. Sufficient parking should be made available for the new properties and shoppers. The building of genuinely affordable family homes should be prioritised over high density housing. Due consideration should be given to the surrounding infrastructure - roads, schools, GPs, parking and public spaces and the number of new homes limited accordingly. Any redevelopment needs to enhance the character of the area rather than change it beyond recognition as has happened in Lewisham. Proper consultation with existing residents of the area should take place.	Noted. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The Local Plan sets out a policy of a strategic target of 50% affordable homes	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. In my opinion it is very important that Leegate Centre is redeveloped into a thriving attractive and welcoming shopping and social meeting area catering for residents well-being alongside new housing. As a local resident I do have some major concerns about the current proposals for the development by Galliard Homes which I will outline below. I understand the Council is potentially looking at 3 sites to develop, the Leegate Shopping Centre, the BMW garage site and the Sainsbury site. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in a cohesive and linked way in order to enhance the whole historic area of Lee Green. The Plan should state clearly that new developments on these sites must fit alongside and complement existing older buildings at the Lee Green cross roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. It would be a main feature of the plan to ensure that the River Quaggy by the BMW site and along to the back of Weigall Road playing fields is opened up with pedestrian access and pathways for all. The work of the Friends of The Quaggy and Lewisham Council has been effective in developing some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the LeegGate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The draft Local Plan Part 2 policies on High Quality Design and Heritage clearly set out that development proposals must respond positively to the site context, including local character. The plan must be read as a whole. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			work should continue and now be of benefit to the residents of Lee. I have major concerns about the height of the buildings proposed for Leegate by Galliard Homes. The plans suggest blocks of flats to reach 15 storeys high which by far exceeds the height of any other building in the area and is fifty percent higher than the highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. I think the Local Plan should state an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys in order to facilitate walking, sitting and shopping in pleasant landscaped public areas. Very tall buildings are overbearing, they block out light and create wind tunnels. This makes areas unattractive, undesirable and unwelcoming and could deter people from shopping or meeting and using planned local facilities. A congestion of towering flats and the very busy and polluted junction and feeder roads would in my opinion only attract loitering and encourage anti-social activities. There must be a maximum height limit set for this development. There is an opportunity to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. In order to do this any development will need to respect the proportions of the local area and not create a ghost town of highrise blocks as seen in parts of Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to compaction of very high buildings that appear in Galliard Homes simulated pictures of their proposed Leegate development. It is essential that the infrastructure is developed to match the number of proposed new residents with increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities which will be especially needed by older people when shopping etc.	As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03	I have just learned today of the Leegate /Lee Green proposed plans. I do have some concern that details of this have not been more widely circulated. From what I see so far, I would have concerns on the following matters: 1. Duration of the building work. There does not seem to be any timeline. This appears to be a major infrastructural development and the risk for chaos, additional traffic and	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

			pollution over a protracted undefined period would not be welcome - nor safe - at an already very busy strategic transport interchange and residential area. 2. Increased Environmental pollution. During build and after completion with the additional proposed c.600 dwellings this would be adding further to the road traffic and numbers of cars moving generally through - in what is already an area suffering high levels of air pollution (from traffic). 3. Where are the plans for more cycling and more pedestrian-friendly areas? 4. The height of the proposed building - 15 stories - is vastly out of proportion to the rest of the locality. There is no visual of what is proposed, that I can find, but this would seem unsightly. How can this high density of housing be able to provide the space (inside and outside) to support the good mental wellbeing of those who will live there? 5. Local infrastructure and public amenities. I do not see plans for the additional schools, GP/health services and other public amenities - will there be such additional provision made to accommodate the enlarged community and within the time frame?		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	Lewisham's Local Plan and Galliard Homes proposals to develop Leegate: 1. In the draft Local Plan, three large sites in Lee Green have been allocated for housing – Leegate, Sainsburys and the BMW garage. These sites cannot possibly sustain a high volume of housing without a corresponding substantial increase in infrastructure. How would this be effected? Where is it suggested there would be space for the required schools, GP surgeries, dentists, and all the other services required by the residents. Where would there be open green spaces, it would appear that the housing would take up all the available space. The nearby parks are already very busy. Has any thought been given to the level of pollution which would inevitably increase on the present levels? What about transport links, these are barely sufficient for the existing population , hence the reliance on cars and over recent months the low traffic neighbourhood scheme has led to an increase in congestion, delay for emergency services and resulted in more pollution. Lastly on this point is this density of housing actually required given the fact that London's population is decreasing and are flats in tower blocks the type of accommodation actually required? Is there not a need for low rise housing for young families and the elderly?	Noted. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The Council has prepared a Strategic Housing Market Assessment, which looks at housing needs of different groups. This has informed the preparation of the Local Plan. Further details are set out in Part 2 Housing policies.	No change.
	3	LEA 02	3. Re Timing I realise that I am commenting on the last day but due to the lack of consultation with the local community I have only just learned of this	Noted. The Local Plan consultation was held for roughly a 12-week period which is 6 weeks more the statutory minimum set out in our Statement of community involvement.	No change.

	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. It is very important that the Centre is redeveloped into a good shopping and social meeting area with new housing as well but as a local resident I do have some major concerns about the current proposals being developed by Galliard Homes which I will outline below. I understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other and enhance the whole area. The Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. However, I have major concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. I think the Local Plan should set a 10 storey maximum height limit for any single building planned for the Lee Green area and also state an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. Very tall buildings would make the area unwelcoming and unattractive and deter people from using the shops and facilities being planned for the site. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will need to respect the proportions of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures of their proposed Leegate development. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities which will be especially needed by older people when shopping etc.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

	3	LEA 02 LEA SA 03	I am writing with regards to the plans for Leegate in Lee Green. As a resident of Lee for over two years and growing up in the Borough of Lewisham, I have seen many changes. From Lewisham Centre, where the ever growing and influx of new build properties and high risers. To the gentrification of areas like Deptford and New Cross its looks like a completely different Lewisham. I would like the Leegate area to be a place where people can socialise and keep a community feel. The area in general lacks spaces to socialise and has many historical properties. I understand that there is a housing crisis, however I feel that building so align with what already exists. Furthermore many of these new builds claim to be affordable but are really not. It would be nice for local people to have a place to start up a small business and include their community for support. After the pandemic it will be needed to have a place to socialise after so much time in isolation. I think that our young people also need somewhere to safely socialise. This in turn could limit the amount of criminal crime that we see if under 25's. Many young people result to this because of a lack of community and productive things to do on their doorsteps. It would be great to see young and old in one space to limit any further stereotypes and prefigured and mass media publicises. These are my opinions on what I would like to see happen in my local area and the proposed plans for Leegate.	Noted. The draft Local Plan proposals broadly seek to support the revitalisation of Leegate centre to secure its future as a vibrant hub of community and commercial activity. This includes the provision of significant public realm enhancements, modern workspace and business units, and a wide range of complementary main town centre uses. The draft Local Plan sets an overall target for 50% of new homes to be genuinely affordable, with affordability linked to local income levels.	No change.
	3	LEA 02 LEA SA 03	I was shocked to learn of the plans for the new Lee Gate Centre and the surrounding area which reached me last night with a deadline for this Sunday. The proposals show no understanding of the area, its infrastructure and traffic burden that is already thundering through it. Area: At a proposed height of up to 15 storeys, the building would be by far the highest in the area. We have seen at the Lewisham roundabout what eyesores these are likely to be. If you are going to build ugly and brutal, why make it the most visible building in the area? Why do you want to change a community by parachuting Canary Wharf type blocks? There are better ways to achieve affordable housing. You would also add a large amount of people to an area that is creaking at the seams, where a school development was blocked allegedly for lack of space. Infrastructure: The "Tiger" junction is known across London for the wrong reasons. Routine floodings, a traffic choke point, pollution and lack of educational facilities in the surrounding area mean that already with the existing amount of people, the infrastructure is creaking. Catchment areas for primary schools are tiny not to speak of secondary school. I cannot see how this fragile and overwhelmed infrastructure will absorb such a high density project.	This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process Low Traffic Neighbourhoods are outside the scope of the Local Plan. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.

			Traffic: We all "fondly" remember the LTN project last year that put the community under strain. LTN was introduced by a general agreement that the area suffers from ridiculous amounts of traffic congestion, leading to pollution (we have the first casualty with "pollution" on the death certificate), ridiculous delays for traffic and a general hostility to cyclists and pedestrians. The current situation is unacceptable, adding another 450 households would be plain stupid. I would already encourage future residents to sue Galliard Homes for the damages caused by pollution on their health and properties. I strongly urge you to reconsider this proposal that would make the area unliveable for current and future residents. If only in your own interest, the resale value of your properties will decline substantially once the dynamics that I have described above play out.		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding in a personal capacity to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. It is fundamentally important that the Centre is redeveloped into a good shopping and social meeting area with new housing as well, but as a local resident for over 20 years, I share a number of very significant major concerns about the current proposals being developed by Galliard Homes with many neighbours and local residents, which I will outline below. I understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury's. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other, do not change the character of the current layout and enhance the whole area. The Plan has to state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. However, I have extremely serious concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. I think the Local Plan should set a10 storey maximum height limit for any single building planned for the Lee Green area and also state an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. Very tall buildings would make the area unwelcoming and unattractive and deter people from using the shops and facilities being planned for the site.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			There is a great opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will have to respect the proportions of the local area and absolutely must not create disproportionately large high rise blocks - like parts of Kidbrooke Village and in Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures of their proposed Leegate development. The overpowering development as shown would simply dwarf the surrounding area. I believe it is also essential that appropriate infrastructure should be developed so it can match any influx of new residents with the right amount of increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities which will be especially needed by older people when shopping etc.		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding in a personal capacity to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. It is fundamentally important that the Centre is redeveloped into a good shopping and social meeting area with new housing as well, but as a local resident for over 20 years, I share a number of very significant major concerns about the current proposals being developed by Galliard Homes with many neighbours and local residents, which I will outline below. I understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury's. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other, do not change the character of the current layout and enhance the whole area. The Plan has to state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. However, I have extremely serious concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. I think the Local Plan should set a10 storey maximum height limit for any single building planned for the Lee Green area and also state an expectation that most new	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the LeeGate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The draft Local Plan Part 2 policies on High Quality Design and Heritage clearly set out that development proposals must respond positively to the site context, including local character. The plan must be read as a whole. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. Very tall buildings would make the area unwelcoming and unattractive and deter people from using the shops and facilities being planned for the site. There is a great opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will have to respect the proportions of the local area and absolutely must not create disproportionately large high rise blocks - like parts of Kidbrooke Village and in Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures of their proposed Leegate development. The overpowering development as shown would simply dwarf the surrounding area. I believe it is also essential that appropriate infrastructure should be developed so it can match any influx of new residents with the right amount of increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities which will be especially needed by older people when shopping.	necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Local Plan regarding the future development of the Leegate Shopping Centre. It's great to see ideas for a redevelopment into a good shopping and social meeting area with new housing, but as a local resident I do have some major concerns about the current proposals being developed by Galliard Homes which would be detrimental. My first concern is regarding the height of the buildings I understand the Council is potentially looking to develop across The Leegate Shopping Centre. One block is intending to reach 15 storeys high which far exceeds the height of any other building in the area and is 50% higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10. I strongly believe that the Local Plan should set a10 storey maximum height limit for any single building planned for the Lee Green area and also state an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. Very tall buildings would also make the area unwelcoming and unattractive and deter people from using the shops and facilities being	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			planned for the site, as well as deterring potential future residents on the nearby roads - I know for a fact it would deter me should I be looking in the local area. I welcome the opportunity to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16. but to any development will need to respect the proportions of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. Lee Green's most vibrant parts are based on the period buildings and green spaces, so it is important to respect this. Whilst the existing Leybridge flats are 10 storey blocks, they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures. It's in the name Lee Green, and development should look to accentuate this - bringing a natural feel with communal green spaces that sets it apart from over-tall and overbearing concrete blocks. Regarding the BMW garage Site and Sainsburys, the plan has to ensure that all these sites are developed in ways that link up with each other and enhance the whole area. The Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. I also believe that the local infrastructure should be developed so it can match the number of new residents from schools and green spaces to sufficient additional parking facilities. We have already been known to face a rat-run in commuter times as well as intense traffic, and local residences need no more pressure on our streets.	As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02	Development of Lee Green I support the stand that Lee Green development needs to be limited in height and density. There are old, neglected building that must be restored and re-purposed. Plans must ensure that the quality of life for Lee residents is improved with less traffic and parking.	Noted. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Draft Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. It is very important that the Centre is redeveloped into a good shopping and social meeting area with new housing as well but as a local resident I do have some	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			major concerns about the current proposals being developed by Galliard Homes which I will outline below. I understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other and enhance the whole area. The Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. However, I have major concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. I think the Local Plan should set a10 storey maximum height limit for any single building planned for the Lee Green area and also state an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. Very tall buildings would make the area unwelcoming and unattractive and deter people from using the shops and facilities being planned for the site. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will need to respect the proportions of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliards simulated pictures of their proposed Leegate development. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a vibrant community centre and parking facilities especially needed by older people when shopping etc. The plan should state the importance of developing new green spaces and improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children.	The draft Local Plan Part 2 policies on High Quality Design and Heritage clearly set out that development proposals must respond positively to the site context, including local character. The plan must be read as a whole. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	

			The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I agree about the need for developing Leegate and the BMW garage for housing. However, the 'tall building' clause that excludes Lee Green from developing high rise buildings is not honoured in the plans. The criteria for excluding 'tall buildings' has not changed and Lee Green remains very much a low rise low density residential area that promotes community and inclusivity. A high rise and high density building plan will be detrimental to this and to the health and wellbeing of Lee Green residents. Any plans that also increase the density also impact on local infrastructure, services and transport. There is already significant congestion and pollution in Lee Green and having tall building on 3 sides will create a stagnant pool of pollution that is against the clean air commitments being made. This is especially in relation to December's Southwark Coroner's Court inquest that found that air pollution 'made a material contribution' to the death of Lewisham resident 9-year old [name removed]. I urge Lewisham Council to consider these points and be accountable to its resident on these matters for the long term. The environment and 'community for all' should be at the heart of any development.	This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The Council acknowledges the issue of poor air quality. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am concerned about the current proposal to redevelop Leegate and the other sites on the Lee Green junction that could result in tall buildings being built in the area that are not suitable or sustainable within the community. The current proposal does not provide any commitment to increase service provision for health, education and transport. If the current proposal goes through it will set a precedent that will repeat the same mistakes that were made when Leegate was first built in the 1960's. High density building can work but only if the right infrastructure is baked in from the start. The lessons from previous failed estates are well known and Lewisham council should hold the developers accountable for creating a sustainable community. The redevelopment of Leegate is long overdue and should be an opportunity to enhance the neighbourhood.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			Lewisham council can help support the community by ensuring: 1. Maximum of 10 stories high 2. School and healthcare facilities on site 3. Dedicated cycle lanes at Lee Green 4. Pedestrian Access to River quaggy 5. Increased public green space.	The draft Local Plan proposals for the Lee Green and East area include provisions around Healthy Streets to support walking and cycling, and improving access to the Quaggy.	
	3	LEA 02 LEA SA 03	Galliard Homes should not be allowed to exceed maximum existing local height by 37% including the Sainsburys and BMW sites, which also should not exceed existing local height by 37%.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am emailing to submit my views with regards to the consultation of the draft Lewisham Local Plan. I have just been informed that Galliards Homes have purchased the site at Leegate, Lee Green which is opposite my home in Eltham Road, SE12 8ES. I am aware that Galliards are in talks with Lewisham regarding their plans for the Leegate site which includes a proposal of up to 630 new units up to 15 storeys in height. I am also aware that included in the local plan are potential new building sites at Sainsbury's and the BMW garage, all located very close to each other in the same area. I understand there is no guidance in the local plan for height limits for the Leegate site, even though the Lee Neighbourhood Plan states that "building height should be in keeping with the surrounding buildings including the building design, mass, scale and detailed design and that generous set backs and public realm are included in order to build human scale". This needs to be clearly clarified in the local plan. Also The plan needs to give detailed guidance and clear plans on future building developments within the Lewisham and Lee Green area in order to guide future developers on what can and cannot be permitted in the area. The London plan states that tall buildings should only be built in places with transport links and other infrastructure that can support them. Well clearly the team at Galliards do not live in the area as although there is transport links in place these are severely stretched to the limit and if you add a possible 630 new units (or more) it will be impossible to get anywhere on public transport. This will include more cars in the area and what with the recent introduction of Low Traffic Neighbourhoods you will be contributing to the increase of traffic along Eltham Road and surrounding areas. Increasing pollution and poor living conditions to the residents already in place. We also do not have the infrastructure in place in the area to deal with the mass	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The draft Local Plan Part 2 policies on Sustainable design and infrastructure address low and zero carbon development.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			increase on local resources, including Schooling, healthcare, car parking and shopping access. The Local plan needs to address these issues and state clearly with regards to housing intensification how it will support low carbon emissions, promote positive health for local residents impacted by the new developments, and how it will create more amenities needed for the growth in the area. It will also need to state how it will look out for current residents during the construction of these new properties with regards to noise pollution, dust pollution, access to their homes during the many years it will take to complete. I believe the maximum story height of any new developments in Lee Green should be four storeys in keeping with the area. The proposal shows that the buildings will be far too close to the main road and will take any natural light and overshadow the houses on the opposite side of the road, negatively impacting residents that already live there. There will also need to be more green areas to help with the increase in pollution that this design of buildings will create in the area on top of an already busy main road.		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. It is very important that the Centre is redeveloped into a good shopping and social meeting area with new housing as well but as a local resident I do have some major concerns about the current proposals being developed by Galliard Homes which I will outline below. I understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other and enhance the whole area. The Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. However, I have major concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. I think the Local Plan should set a maximum height limit for any single building planned for the Lee Green area and also state an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			Very tall buildings would make the area unwelcoming and unattractive and deter people from using the shops and facilities being planned for the site. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will need to respect the proportions of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures of their proposed Leegate development.		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I was shocked to see the new plans for Leegate and the proposals to permit future tall buildings on the nearby Sainsburys and BMW sites. Whilst I support the building of affordable and sustainable new homes, and believe that Leegate has been allowed to fall into disrepair, I object to the density and height of the proposed new buildings. Please can you inform me how the current infrastructure (in particular access to schools, health centres, public open space, public transport) will be developed to support the building of up to 630 new homes. It is a blessing that planners of the past retained the heritage of the Grade II listed buildings that make up the North side of the Lee Green junction, giving the location a sense of place and character today. This heritage was destroyed on the South side of the junction. Current and future generations would value decent, sustainable and attractive homes, community services and infrastructure that enhance the character of Lee Green, rather than maximum height, maximum density blocks, with maximum profit for developers and long lasting negative impact on local people. Please do not allow buildings of up to 15 storeys on this site: it is not appropriate. None of the blocks should be higher than the nearby 10 storey Leybridge blocks, which are of much lower density, surrounded by green space, trees and hedges and not overshadowing listed buildings.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.
	3	LEA 02	I do understand the need for increased housing stock. I also welcome development of the Leegate site in Lee Green, however I would like to a significant proportion of green spaces within any developments and a maximum building storey height for any future housing developments to be no higher than 4 storeys on the Leegate site in keeping with the surrounding area and for building height and density of any developments to be mentioned in the Local Plan. I would like to see a building height of no more than 4 storeys at the Sainsbury's site and no more than 4 storeys at the BMW garage site..	Noted. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

				Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. Given the urban nature of the sites in Lee Green and the need to optimise the use of available land to respond to London's housing crisis it not possible to include significant, large open space – however each scheme should provide adequate public and private amenity space.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am aware that the is a need for housing stock within London and that within the Local Plan in addition to the Leegate site, Sainsbury's and the BMW Garage which are all in close proximity to my home have been identified as potential sites for housing developments in the future. It concerns me that there is no detailed guidance within the Local Plan setting out clearly the plans for future developments within Lewisham and the Lee Green area specifically and this may allow future developers the right to build as set out in the Local Plan. If guidance is not robust and clear the impact on the Lee Green and surrounding area will be detrimental in so many areas. The infrastructure within the area does not support any extensive developments. The area is already negatively impacted by the introduction of the Low Traffic Neighbourhoods which is unfairly and dangerously contributing to increased traffic along Eltham Road and the surrounding streets. Mass housing developments will exacerbate this, resulting in huge volumes of traffic and carbon emissions which come with it, affecting the health of the residents who live in the area. In addition, huge developments will lead to an increase in car parking, shopping access, schools, along with a huge demand on public transport. We do not have the infrastructure in place to support this.	Noted. The Local Plan is a strategic policy document and the Council needs to carefully consider the level of detail provided for each area within the site allocations. Further detailed guidance at a masterplanning level would normally be undertaken as part of a Framework Document or Supplementary Planning Document (SPD). Low Traffic Neighbourhoods are outside the scope of the Local Plan. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies.	No change.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	In respect of Local Plan guidance for Lee Green, I am happy for the Leegate, Sainsbury's and BMW Garage sites to be built on for housing, but the density of housing must be in keeping with the surrounding area and adhere to the London Plan. The Sainsbury's site could be redeveloped to include low-level housing but the supermarket must be retained, particularly as the demand for such facilities will increase if more housing is built. The BMW Garage is on a small site and I would prefer the garage to remain, but if the site is to be used for housing, it must not tower above the adjoining buildings and must also allow for access to the River Quaggy as stated in the Local Plan. I would be delighted if Leegate is developed, but there must be facilities for the local community including neighbourhood retail space and other community facilities such as a community centre and fitness/wellness facilities. The London Plan clearly states that tall buildings should only be built in places with transport links and other infrastructure that can support them, and on that basis Lewisham has explicitly excluded Lee Green from its Tall Building	This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Geen we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			opportunity areas in its draft Local Plan. Galliard's plans to build up to 15 stories high are totally unacceptable and would severely detract from the overall look of Lee Green. We have all seen the detrimental effect of the large number of tower blocks in Lewisham town centre and this building density would be completely out of place in Lee Green. In my opinion the maximum height of the Leegate development should be 10 stories (with some variation between the buildings), 5 stories for the Sainsbury's site and no more than 3 stories on the BMW Garage site.	Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	Galliard Homes should not be allowed to exceed maximum existing local height by 37% including the Sainsburys and BMW sites, which also should not exceed existing local height by 37%.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	We wish to make the following points regarding Lewisham's Local Plan and Galliard Homes proposals to develop Leegate: **Density** In the draft Local Plan, three large sites in Lee Green have been allocated for housing – Leegate, Sainsburys and the BMW garage. It is questionable whether these sites can all sustain a high volume of housing. Large increases in housing need corresponding increases in infrastructure. Lee Green is not currently allocated any money from Lewisham council's major infrastructure spending pot. Other wards are. Lee Green also receives the lowest amount of all Lewisham's wards from the much smaller 'community' infrastructure pot. Galliard Homes proposals for Leegate are for over 630 housing units; more units than the Leybridge Estate behind Leegate has. When the Leybridge Estate was built, Brindishe Lee was built to educate its children. To serve all the residents of the proposed Galliard Homes development, considerable increase to the infrastructure of Lee Green will be needed and if the Sainsburys and BMW garage sites are developed to similar density as Galliards proposed Leegate plans, demand for local infrastructure will be tripled. In addition to schools, GP surgeries, dentists, improvements in public transport and green spaces would be required for residents. These infrastructure improvements should all be named in Lewisham's Local Plan, and information given on their location, when this will happen and how they will be paid for. Increasing the housing density would also add to traffic generated by the residents by way of delivery vans, visitors etc. The newly imposed Low Traffic Neighbourhood scheme has generated considerable additional traffic congestion at the traffic lights at Lee Green as traffic is funnelled on to Eltham Road and Burnt Ash Road and a huge residential increase will bring more traffic delays into the area.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			We also question the necessity of developing all three sites with the population of London shown to be decreasing. **Height** The 10 storey Leybridge Estate behind Leegate is currently the tallest building in Lee Green but Galliard Homes are proposing building up to 15 storeys high, exceeding maximum existing local height by 37%. If this were allowed, it could be a precedent for developers wishing to redevelop the Sainsburys and BMW sites, therefore we propose that the 10 storey height limit for each site is written into Lewisham's Local Plan. The London Plan states all tall buildings should only be built in places with transport links and other infrastructure that can support them. Any new development should fit in with the local area which has a 4 storey high Grade II listed fire station opposite Leegate, a locally listed Old Tigers Head of 3 storeys opposite and the Lee Manor Conservation Area in the vicinity.		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. It is very important that the Centre is redeveloped into a good shopping and social meeting area with new housing as well but as a local resident I do have some major concerns about the current proposals being developed by Galliard Homes which I will outline below. I understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other and enhance the whole area. The Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. Lewisham Homes have been very supportive of adding Swift boxes or Swift bricks into the soffits of new buildings and I think that addition would also be very welcome along with any other nature friendly initiatives that can be added. I do have major concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. I think the Local Plan should set a10 storey maximum height limit for any single building planned for the Lee Green area and also state an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Local Plan amended with new policy on Biodiversity Net Gain, including for individual developments. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. Very tall buildings would make the area unwelcoming and unattractive and deter people from using the shops and facilities being planned for the site. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will need to respect the proportions of the local area and not create the high rise blocks of parts of Kidbrooke Village and Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures of their proposed Leegate development. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities which will be especially needed by older people when shopping etc.		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Draft Local Plan, As a local resident I have focussed on the proposals as they affect Lee Green and especially the issue of the future development of the Leegate Shopping Centre. I do also have some major concerns prompted by recent and current development proposals which prompt some of our comments below. The draft plan proposes that Lee Green be designated a District Centre and there is a cluster of 3 sites proposed for development, The Leegate Shopping Centre, The BMW garage Site and Sainsbury. There should be guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other and enhance the whole area and do not negatively affect the area. DESIGN Context The Plan should state clearly that new developments on these sites must sympathetic with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. Figure 5.1 in the draft plan appears to identify the Lee Green sites as a proposed location for tall buildings (30m plus). Lee is a suburb and not a city centre, this scale is not appropriate to the existing fabric and the phrase "emerging context" looks like a pretext for overdevelopment.	Noted. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The Local Plan is a strategic policy document and the Council needs to carefully consider the level of detail provided for each area within the site allocations. Further detailed guidance at a masterplanning level would normally be undertaken as part of a Framework Document or Supplementary Planning Document (SPD). The new London Plan has removed the density matrix, as developments are now expected to use the design-led approach to demonstrate how the 'optimal capacity' of a site will be realised. Therefore it is not considered appropriate to set a fixed plot development / density ratio for housing. The Local Plan takes forward the London Plan approach, with additional details to ensure full consideration of a site and its local context, including heritage and character. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			Plot Development ratio/ Density There should be some form of guideline to the allowable density of building footprints. Increased building Height should be balanced against reduced plot coverage. Permeability, rights of way, access to Daylight & Sunlight minimum Pavement widths The Leybridge Court Towers are 10 stories above ground level and were recently used by st Modwen as a benchmark for height and a justification for their proposals however these towers have shallow floorplates and have significant landscaped grounds surrounding them and allow daylight Public green space and amenity The maps in the Draft Plan identify that there is a lack of public open space the substantial increase in population density resulting from the development of these three sites will create an increased need for open spaces for leisure and sport. While the neighbourhood has several lovely existing parks (some of which are located in Greenwich). These are all well used and the increase in population will place these under greater pressure. Most of the existing open spaces are the legacy of historic planning or post war development. The local plan should include some proposals for improved public space and amenity in Lee. The recent developments proposed at Leegate reduced public civic space. Ecology The work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lewisham. Infrastructure There appears to be no explicit link between the additional development/population, proposed at Lee Green and the provision of social infrastructure. Parks, sports facilities. Nursery Schools, primary Schools, Secondary schools, Doctors, Dentists, The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. We will continue to work with key stakeholders, including the Friends of the Quaggy, through the plan making and development process. The draft Local Plan includes a number of provisions for river protection and improvements, including in the East area. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03	I am responding to the local plan for the redevelopment of the Leegate centre. While I understand the need for redevelopment of the Leegate, I would ask the current proposal by Galliard to be scrapped and redesigned. I DO NOT believe we need over 10 storey or higher buildings in area which is typically built no higher than three. We live right by the Leegate centre and the area has been brought to life by the new shops and yoga studio which has allowed independent businesses and a community hub to	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. It should be noted that although the Council does encourage developers to carry out pre-application consultation with residents there is no statutory requirement and this is at the discretion of the developer.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			thrive. This has added real value to our local area and I would hope that any new proposals would incorporate opportunity for independent businesses into the new space. Lockdown has also show that we desperately need to protect public space, so the centre of the Leegate and green space should not be built on. But most importantly the towers should be in keeping with other buildings in the area, as has always been the case with new buildings. Our flats on Burnt Ash Road are three storeys high and set back from the road and this is high enough. There is not enough green space to accommodate the increase in people or community facilities such as schools or doctors for anything bigger. We desperately need affordable housing in the area, but not luxury apartments or similar. Please do not go ahead and give more time for public consultation before allowing this redevelopment.	The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The site allocations for Lee Green district centre include requirements for development to contribute to the delivery of significant public realm enhancements, including new publicly accessible open space within the town centre. The draft Local Plan Part 2 Green infrastructure section also set out policies for the protection and enhancement of open and green spaces.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am writing to let you know my opinion on how the draft Local Plan could better support quality development in Lee Green. I am in principle supportive of the Leegate, Sainsburys and BMW garage sites being built on as they are brownfield sites and there is a clear need to protect the existing Metropolitan Open Land in the area. I am also happy to hear of the intention to open up public access to the Quaggy and aim to create high quality public space for pedestrians in Lee Green. However, I am concerned by the density of development suggested e.g. in St Modwen's former plan for Leegate, and apparently also in the draft plans for Leegate suggested by Galliard Homes. I feel that it is especially important to set specific limits for the density of development in the Lee Green area, as it would not be reasonable not to expect all possible sites to be developed to the same intensity in future, once a precedent has been set with one site. There are several important potential negative impacts of too dense development on these sites, which I shall detail below. Infrastructure I am concerned that developing these three sites intensively could lead to many new housing units being added to the area, without making allowances for improving local transport infrastructure. Public transport in the area appears to be good, with bus services and three train stations within walking distance. However, at peak times much of this existing public transport is already at full capacity. To build many more homes, without enough dedicated parking space for household cars because of the aim for new developments to be greener – which I am very supportive of – further investment in safe cycling infrastructure in this area, especially segregated lanes, and consultation with TfL on how local stations and bus services can support such an increased demand in public	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			transport is needed. I am concerned that otherwise the impact of dense new developments putting many more people onto public transport will cause such overcrowding that those people who do have the option of using cars will be more inclined to do so, which would be against the council's intention for the area with the work on introducing Low Traffic Neighbourhoods. Education I am concerned that the aim to develop the Leegate, Sainsbury's and BMW garage sites as mixed retail and residential use has not properly taken into account the current provision of education in the area. The primary schools in the area seem to be at or over capacity according to Ofsted, and it will not be an easy thing to set up new schools – the International Academy of Greenwich has just attempted to set up in the Lee Green area, and is now closing to all years except its current Year 10, which seems to be partly due to inability to source a permanent site. I urge the council to carefully consider the density of residential development which can be supported by existing primary schools, especially as the existing housing in the area remains attractive to young families according to the material put through my door by estate agents! Unless the council has evidence that the number of children in the area will somehow be going down soon, which continued movement of families into the area does not suggest, dense residential developments in the Lee Green area will cause a considerable local shortage of school places and this must be considered when decisions on housing density are made. Height Lewisham has explicitly excluded Lee Green from its Tall Building opportunity areas; yet Galliard Homes are proposing to build up to 15 storeys high, again setting a precedent for future development at the Sainsbury's and BMW sites to also build so high. Galliard claim that this height will not negatively impact on the three conservation areas and Lee Green's own listed buildings – which I question – however the council must also consider the likely impact on the conservation areas and Lee Green's own heritage features once the Leegate scheme has set a new maximum height for the area. In my opinion, the Leybridge Estate's ten storey height should be the maximum for the Lee Green area. Also, this ten-storey maximum height should be allowed only when there is significant space between buildings of the maximum height; even if there are low-rise blocks between these. Several suggested schemes for Leegate have created considerable mass at around eight storeys across most of the development, and then top this with multiple even higher buildings. Even by itself, this will create a considerable change to the character of the area, and should something similar be planned for the Sainsbury's site the area and its listed buildings will become considerably overshadowed, certainly figuratively		

			and probably also literally. Great height and large massing of just-a-bit-shorter buildings will also certainly impact on the quality of public space at ground level in the area. I look forward to seeing the results of the consultation and the final Lewisham Local Plan		
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	From what I have read in the proposal the plan does not provide information on how improvements to infrastructure and funding for such infrastructure will be met. For such a large development (and possible future developments on the nearby BMW garage and Sainsbury's sites) infrastructure improvements will be required. The emerging Plan from the Leegate pre consultation is not in line with Lewisham council's 'Draft Local Plan.' As residents of and contributors to the local community we would ask that the following is considered and is written into the Local plan prior to acceptance of planning permission. 1) Maximum height for Leegate centre to be in accordance with existing buildings and reflected in the plans and within the Lewisham local Plan rules. 2) Maximum height of other buildings to be introduced to Lee Green is no higher than the existing 4 storey Victorian buildings on Lee High Road. 3) The development rules are fixed in terms of mass, height and density for all Lee Green surrounding areas so that creeping high rise sprawl is avoided within the area. 4) The development takes into consideration and sets out the infrastructure improvements that are required. Lewisham council sets out how they will fund this with clear plans and time scales. 5) Lewisham sets out a plan for how the green space behind Eltham Road to the north side can be used to facilitate increasing levels of population, whether this area forms Parkland for use by the whole community. We really need the support of our local council and must be able to trust them to ensure that our local area is not ruined by their lack of foresight or planning and non-adherence to their own policies.	Noted. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. Further details on the infrastructure funding are set out in Part 4 of the Local Plan on Delivery and monitoring. The site allocations for Lee Green district centre include requirements for development to contribute to the delivery of significant public realm enhancements, including new publicly accessible open space within the town centre. The draft Local Plan Part 2 Green infrastructure section also set out policies for the protection and enhancement of open and green spaces.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. It is very important that the Centre is redeveloped into a good shopping and social meeting area with new housing as well but as a local resident I do have some major concerns about the current proposals being developed by Galliard Homes which I will outline below. I understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			Site and Sainsbury. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other and enhance the whole area. The Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. However, I have major concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. I think the Local Plan should set a10 storey maximum height limit for any single building planned for the Lee Green area and also state an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. Very tall buildings would make the area unwelcoming and unattractive and deter people from using the shops and facilities being planned for the site. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will need to respect the proportions of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures of their proposed Leegate development. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities which will be especially needed by older people when shopping etc.	character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03	I would like the plan to state that all future developments in Lee should be in keeping with existing developments, which are three or four stories high. The vast majority of buildings in this area are low rise. I would like the plan to state that if buildings are going to match the height of the one building that is taller - the Leybridge estate - that they must, like Leybridge, be set back from the main road and have a similar proportion of communal space per square foot of housing.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			The plan should state that no new buildings in Lee should be taller than Leybridge and should recognise that Leybrige is an anomaly in the area. Leybridge's 10 stories are not a baseline for the area. There are serious issues around pollution on the junction by the Tigers Head and I understand these have previously been illegally high. The plan should state that new developments must not add to pollution on this junction. Any new developments must contribute to the local infrastructure in a proportionate and meaningful way. That means schools, community centres and green space along with genuinely affordable housing. It's really important that we ensure communal access to the Quaggy and the plan should prioritise access to green space and waterways. I think all of us who live in and around Leegate are happy that St Modwen are finally doing something about their poor quality stewardship of this part of our neighbourhood – even if 'that thing' is selling Leegate on. Their inability to do what they wanted with the site was in large part to do with our co-ordinated local response to their unsuitable plans. We will expect Gaillard to do better, and local people will expect them to present a plan for Leegate which is in keeping with the area. We will support the council as much as we can in ensuring a good result for Leegate and our community. The plan should as far as possible ensure new development balances social good with private profit – or at the very least, to ensure developers cannot use our neighbourhood simply to boost multi-million pound profits (Gaillard reported profits of £62m in 2019) and shareholder returns to people who live far away from here.	housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03 LEA SA 04	I understand the consultation on the plans for Leegate closes on 11 April. Lee Green has been run down for some time and this does need to be addressed but I do have some concerns about the plans I've seen and whether what's proposed is really consistent with the principles for development reflected in Lewisham's Local Plan. My main concern is about the potential height of the new development. I understand that it's proposed that properties may be up to 15 storeys high. This seems excessive and out of step with the rest of the local area. The Leybridge Estate is 10 storeys and most other buildings in the neighbourhood are considerably less. As well as dominating the landscape, tall buildings, especially when grouped together tend to block out light which would have an impact on for passing pedestrians, residents and the planting at ground level. I'm concerned that allowing 15 storeys here could set a precedent for other developments in the area. My personal preference would	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. Site allocation 4 Sainsbury's Lee Green includes the requirement for town centre uses which could accommodate the reprovision of a supermarket.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			be for the new development to be no higher than Trinity School. I hope that Sainsburys will be retained and that the retail facilities will be expanded and improved. Given the potential increase in population arising from the plans, local facilities and services will need additional capacity. At the moment it's not clear to me how this will be addressed. Finally, while I welcome the suggestion that the River Quaggy should be opened up, more generally in the models of the development that I've seen it looks as if many - and possibly all - of the current trees around Sainsburys and on the adjacent streets would be removed and the extent of any new planting around the site looks quite limited. I hope that's not the case. Apart from aesthetic considerations, trees and other planting help counterbalance the effects of air pollution. These are busy roads.	Both the current and draft Local Plan include provisions around tree protection and, where necessary, appropriate replacement. This will be assessed through the Development Management process, should any future development proposal come forward.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	A number of sites have been identified in Lee, being Leegate, Sainsbury's, Holme Lacey and Burnt Ash. Whilst I do not disagree that these areas are in need of development and improvements the current infrastructure is already under pressure. For instance: 1. It is already difficult to get a doctors appointment within 7 days of request (and this was pre-Covid). We are not alone, this is a common problem in the area.; 2. school places are difficult to get locally (I note that your LP summary states that there are extra spaces to pupil uptake but I do not believe this is the case in this locality) albeit it might be the case Borough wide. 3. The transport network cannot currently cope and this cannot expect to improve with an even greater population in the "east" of the borough. Roads, buses and trains are at times impossible to use due to high volumes of traffic/ people. 4. Green areas and play parks are already extremely busy and more families moving into the area will only further negatively impact on this. 5. Shops - there needs to be sufficient shops for the proposed size of the population and a variety of sized shops and offerings. Smaller shops should be given assistance to establish themselves. 6. Extra policing - greater population will require great police presence. Given that the Leegate development alone is for 630 residential units - the potential strain on the current infrastructure is deeply concerning for us as current residents. What action will be taken to ensure that all developments are committed to a measurable improvement to all aspects of the current infrastructure which will be impacted by the development. For instance, I see that the Leegate proposals suggest financial contributions will be made - how can it be measured that all such contributions are	Noted. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. The remainder of the response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The site allocations for Lee Green district centre include requirements for development to contribute to the delivery of significant public realm enhancements, including new publicly accessible open space within the town centre. The draft Local Plan Part 2 Green infrastructure section also set out policies for the protection and enhancement of open and green spaces, and Part 2 Community infrastructure dealing with children's place space.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			spent on improving infrastructure in the immediate vicinity to the development which will be most affected and not dispersed through the borough. Also, I note that the proposed height of the Leegate development is 15 storeys. This is excessive and not in keeping with the area creating an eyesore and a "concrete jungle" feel. This should not be permitted at this height.		
Blackheath Society no 2	3	LEA 02	**LEA2 Lee Green district centre and surrounds.** We support the thrust of this policy. We particularly support the policy assertion in A that 'Development proposals must contribute to a coordinated process of town centre renewal that responds positively to the area's distinctive character.' This implies a much-needed masterplan for the whole area rather than separate uncoordinated proposals for, say, Leegate and the Sainsbury's site opposite it. We are concerned that the Plan as it stands may allow developers to argue for excessively tall, dense redevelopment of Leegate with poor public realm and lack of coordination with the rest of the District town centre. We are concerned that many of the same mistakes in respect of height, density, traffic, public realm and general lack of masterplan that have been made in recent town centre development in Lewisham centre will be repeated in Lee Green.	Noted. The Local Plan is a strategic policy document and the Council needs to carefully consider the level of detail provided for each area within the site allocations. Further detailed guidance at a masterplanning level would normally be undertaken as part of a Framework Document or Supplementary Planning Document (SPD). With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	No change.
Lee Forum	3	LEA 02 Site allocations	Lee Green specific 2.The height of all site allocations in the Lee Green area need to set out a maximum height for each site allocation.	The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. More explicit thresholds and guidance will be included in a revised policy on building heights, which will need to be read together with the site allocations.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
Lee Forum	3	LEA 02 LEA SA 03	Leegate is a test case for the draft plan. The developer is currently proposing building 37% higher than the nearest tall building, which itself would not be admissible under the draft plan. Will Lewisham fight this? We consider there to be a danger of a mini cluster of buildings built ever higher by ambitious developers thinking each can build 37% higher than the last one. Should this happen the height of the 3rd site will be 28 storeys. This will not reflect the context and surrounding 3 storey buildings that the draft local plan claims to aspire to.	This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
Lee Forum	3	LEA 02	The Lee Neighbourhood plan calls for a detailed design guide/master planning of Lee Green District Centre. This is essential given the above points and that Lewisham's draft local plan includes three site allocations which together, when accounting for planned density, will overwhelm the rest of the town centre put together. We ask that Lewisham include an SPD specifically for Lee Green District centre.	Noted. The draft Local Plan provides a renewed emphasis on planning for the future of Lee Green, with an expanded suite of area-based and site specific policies, which represents a step change from the adopted plan. The Council has no plans at present to carry out a masterplanning exercise for Lee Green. We will keep this under review.	No change.

Lee Forum	3	LEA 02	Lee Green district centre has three large site allocations in it which will, when built, increase the housing on those sites by a multiple of over 40. Yet no mention is made of how and what local infrastructure will be built to cater for hundreds of new homes.	Noted. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.
Lee Forum	3	LEA 02	Page 640 LEA2 Lee Green district centre and surrounds makes no mention of the Forum or Lee Manor Conservation area or Proposed Conservation by *(officer note: name redacted)* and Lee Forum that comprise the bulk of the area. It should do. Extensive consultation with residents has been conducted about how they want the area to develop in drawing up the Neighbourhood Plan. The draft Neighbourhood plan, which is at an advanced stage, should be referenced in this section of Lewisham's Local Plan.	Noted. The Local Plan part 2 policies on Heritage address the historic environment including Conservation Areas. The place principles for the East Area reflect the need for development proposals to respond positively to the distinctive character of neighbourhoods within the sub-area. The plan must be read as a whole. The designation of new CAs is separate to the Local Plan process. Officers have taken into account emerging Neighbourhood Plans during the preparation of the Local Plan, having regard to the stage they have reached in the plan process. This is consistent with national planning policy and guidance. Many of themes and objectives for the Neighbourhood Plan have been captured by the local plan, for example, recognition of the network of green infrastructure and revitalisation of the town centre. Neighbourhood plans should set non-strategic policies which complement and help implement the Local Plan.	No change.
Lee Forum	3	LEA 02	We support the inclusion of workspace for Leegate where there is to be development for housing, a mix of retail and business units. Small offices add to a flexible mix and will increase local employment possibilities.	Support noted.	No change.
Lewisham Liberal Democrats	3	LEA 02	1. The work must be planned carefully so that residents have alternative places to shop during the rebuilding process (for supermarket sites). (LEA2 claims that development at Leegate and Sainsbury's, etc. should be coordinated, but there is no reference to this in individual site allocations.) What plans are there for the sequencing of work to ensure that benefits are maximised and disruption/costs are minimised?	Noted. The three sites at Lee Green are privately owned and as such it is difficult to predict when the sites will come forward. If and when planning applications are submitted these will need to be supported by a Construction Management Plan.	No change.
Lewisham Liberal Democrats	3	LEA 02	2. While it is a good idea to develop small shopping centres near railway stations, the Lee Green shopping centre is not served by a train station within a reasonable distance and public transport would have to be improved for it to be viable without substantial car parking.	Noted. The approach to focus development within and around town centres is a policy principle established by the London Plan, which the Local Plan takes forward.	No change.
Lewisham Liberal Democrats	3	LEA 02	3. The effects of the Lee Green LTN on traffic flow in the area has not been properly considered. The expressed aim to turn major arterial roads (onto which traffic has been funneled by LTNs) into 'healthy streets' seems a vain hope. With no plans for widening the roads or diverting the through-traffic travelling from central London to Kent and vice versa, it is not clear how Lee High Road, parts of Baring Road, the South Circular or the A21	Noted. Low Traffic Neighbourhoods are outside the scope of the Local Plan. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies.	No change.

			(Bromley Road) can be made more user-friendly. How are we going to reduce 'the dominance of vehicle traffic at the main junction', i.e. the crossroads at Lee Green? A thorough analysis of traffic flow throughout the borough taking into account recent modifications such as LTNs and cycle routes needs to be undertaken.	The site allocations within Lee Green set requirements for significant public realm improvements to support the Healthy Streets approach, the detailed natured of which will be considered through the development approvals process.	
Lewisham Liberal Democrats	3	LEA 02	• If planning permission is granted, how will an increase in residential units from 450 to 630 in the **Leegate** development be supported and how will this affect the height of proposed buildings? See the scoping letter at https://planning.lewisham.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=_LEWIS_DCAPR_108788. Will the financial contribution mentioned in the scoping letter (p. 7) be adequate to cover all the extra facilities needed: 'If the socio-economic assessment demonstrates that there will be an impact, mitigation will likely take the form of a financial contribution'?	Noted. This response relates to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
Lewisham Liberal Democrats	3	LEA 02	• Consideration should be given to the establishment of an arts and creative industries hub in part of the **Leegate** Centre similar to those seen in East London e.g. at the Chisenhale Artplace https://chisenhale.co.uk/	Noted. The draft Local Plan makes provision for main town centre uses within Lee Green, which can include business and cultural uses. However in taking a flexible approach to support town centre viability it does not specify individual uses. The draft Local Plan has however identified where there may be scope for new Cultural Quarters, and these are set out in Part 2 in Economy and culture.	No change.
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	As a local resident I am responding to the Local Plan in particular on the issue of the future development of the Leegate Shopping Centre as I have some concerns about the proposals being developed by Galliard Homes. I understand the need for additional housing but it is essential that this it is redeveloped alongside shopping, nature and social meeting areas. Consideration need to be given to cyclists and cycle storage too for the residents of Lee. I understand the Council is potentially looking at 3 sites to develop, The Leegate Shopping Centre, The BMW garage Site and Sainsbury. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites are developed in ways that link up with each other and enhance the whole area. The Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads most of which have a height of 3 or 4 storeys and include a Grade ll listed fire station and a locally listed Old Tigers Head. I do have major concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high which far exceeds the height of any other building in the area - the flats on the Leybridge Estate -	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			which are 10 storeys high. I think the Local Plan should set a 10 storey maximum height limit for any single building planned for the Lee Green area and also state an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. Very tall buildings would make the area unwelcoming and unattractive and deter people from using the shops and facilities being planned for the site. Surely such high buildings would create a wind tunnel and be most unpleasant for people to use the space socially. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will need to respect the proportions of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces which is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures of their proposed Leegate development. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities which will be especially needed by older people when shopping etc.	necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA 02 LEA SA 03 LEA SA 04 LEA SA 05	I am responding to the Lewisham Local Plan in particular on the issue of the future development of the Leegate Shopping Centre. It is very important that the Centre is redeveloped but as a local resident I do have some major concerns about the current proposals being developed by Galliard Homes and I would like to share these with you. I also understand the Council is potentially looking at three sites to develop, the Leegate Shopping Centre, The BMW garage site and Sainsbury's. It would be helpful to have some firmer guidance in the Local Plan to ensure that all these sites - should one or more be chosen for development - are developed in ways that link up with each other and enhance the whole area. The Local Plan should state clearly that new developments on these sites must fit in with existing older buildings at the Lee Green Cross Roads, most of which have a height of three or four storeys and include a Grade 2 listed fire station and a locally listed Old Tigers Head public house. I have major concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach fifteen storeys high which far exceeds the height of any	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are ten storeys high. I think the Lewisham Local Plan should set a ten storey maximum height limit for any buildings planned for Lee Green so that the public spaces provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. To build to the heights proposed would make the area unwelcoming, unattractive and deter people from using the shops and facilities being planned for the site. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Lewisham Local Plan suggests on page 633 para 16.7. But to do this, any development will need to respect the proportions of the local area and not create the high-rise blocks that have now been erected in parts of Kidbrooke Village and Lewisham town centre.	As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
Grove Park Neighbourhood Forum	3	LEA 03	However, the policy falls short in setting out the vision for Grove Park especially the town centre and new district park that was put forward in the neighbourhood plan. Policy LEA3 should be elaborated, as it is done so for LEA2 for Lea Green. All the development principles especially a green infrastructure led development approach should be stated. Including the need for a collaborative masterplanning approach.	Noted. Officers have taken into account emerging Neighbourhood Plans during the preparation of the Local Plan, having regard to the stage they have reached in the plan process. This is consistent with national planning policy and guidance. Many of themes and objectives for the Neighbourhood Plan have been captured by the local plan, for example, recognition of the network of green infrastructure and revitalisation of the town centre. Neighbourhood plans should set non-strategic policies which complement and help implement the Local Plan. The key spatial objectives for the sub-area address the future of Grove Park Local Centre, and this is carried through to the place principles and site allocations, which reinforce the need for sites to be delivered comprehensively through a masterplan process. Policy LEA3 deals more broadly with the Strategic Area for Regeneration, rather than the town centre itself. The more extensive list of policies for LEA2 (in comparison to Grove Park) is commensurate with the higher order of Lee Green in the town centre hierarchy as a District Centre, as well as the nature and scale of development that is planned to come forward within the centre.	No change.
Grove Park Neighbourhood Forum	3	LEA 03	Welcome clause A, especially given the effort put in by the local community in establishing its neighbourhood plan.	Support noted.	No change.
London Wildlife Trust	3	LEA 04	We welcome and support this policy.	Support noted.	No change.
Blackheath Society no 2	3	LEA 04	**LEA4 Linear network of green infrastructure**. We support the development proposals. However we think the network of green infrastructure has been under defined and overstated. There appears to be no map showing the open spaces and parks and the lengthy built-up river, walking and cycle routes between them.	Noted.	Local Plan amended to show green infrastructure on Policies Map and other maps

Grove Park Neighbourhood Forum	3	LEA 04	Clause A rightly points out the network of GI, however the corresponding map in Fig 16.2 does not represent this very well. We propose that the map is edited to highlight all GI in the neighbourhood area. Clause A could also relate back to the main policy which delivers Lewisham's green grid.	Noted.	Local Plan amended to show green infrastructure on Policies Map and other maps
Grove Park Neighbourhood Forum	3	LEA 04	Clause B should also highlight the ecosystem services offered by GI. Ecosystem services is now a well-known term and firmly established in Government strategies (i.e. 25 year environment plan) and documents, and is a fundamental aspect of why GI should be promoted, protected and enhanced, so that the multiple benefits are realised. While it can be covered by term 'environmental value', it should more explicitly make the links to the totality of services it offers, particularly in relation to climate adaptation and mitigation.	Agreed.	Policy LEA4.A amended to highlight the multifunctional value of Green Infrastructure.
Grove Park Neighbourhood Forum	3	LEA 04	This policy fails to highlight and promote the delivery of the most key objective, which is to deliver a new district park in this area as a key component of the linear network of green infrastructure, to bring about the beneficial use of MOL, in line with existing London and national policy.	Noted.	Text amended to make reference to the Councils ambition to create an integrated District Park at Grove Park.
Grove Park Neighbourhood Forum	3	LEA 04	Clause B(c) rightly promotes the enhancement of Green Chain Walk, which provides an east-west walking and cycling link. However, it should also highlight the nature trail from south circular to Elmstead Wood, through the proposed new district park and south through the renewed town centre, which creates a north – south link and connects the green spaces along the highlighted 'strategic green link' on the map in Fig 16.2.	Noted.	Local Plan amended to refer to east-west and north-south links.
Blackheath Society no 2	3	LEA 05	**LEA5 East Lewisham links**. As with LEA4, we support the development proposals, which they complement. However, again we feel the concept has been under defined. Again there seems to be no map (or cross-reference to one elsewhere).	Noted. The sub-area Lewisham Links policies have been absorbed into a borough-wide policy. Maps of the links for each of the sub-areas will be provided in the Regulation 19 plan. The plan must be read as a whole.	Local Plan amended with Lewisham links maps for each of the sub-areas.
Grove Park Neighbourhood Forum	3	LEA 05	Fig 16.2 highlights 'Lewisham Links'. However, to make clear that this is the same (?) as East Lewisham Links, the key label should be made the same.	Noted. The sub-area Lewisham Links policies have been absorbed into a borough-wide policy. Maps of the links for each of the sub-areas will be provided in the Regulation 19 plan. The plan must be read as a whole.	Local Plan amended with Lewisham links maps for each of the sub-areas.
Grove Park Neighbourhood Forum	3	LEA 05	Clarification is needed on the terms town versus local centres. Policy seems to designate two types? Locally one tends to refer to a 'town centre' when talking about Grove Park, even though its 'designation' is a local centre. Some clarity on the definition is needed to avoid confusion.	Noted. The hierarchy of centres is defined within the draft Local Plan part 2 Policy EC11 Town centre network and hierarchy.	No change.
Royal Borough of Greenwich	3	LEA SA 01	Heathside and Lethbridge Estate: While we support the redevelopment of the site, the improvements to the public realm and the increased permeability it provides, the allocation should be more explicit regarding appropriate heights. This site is on relatively high ground and those tall buildings that have already been delivered on the site are extremely prominent in views towards the west from Greenwich Park and Blackheath, more prominent than the much taller buildings at Lewisham Town Centre. The allocation should acknowledge this prominence and restrict building heights to ensure that further development does not exceed the heights of the already-delivered tall elements.	Noted. Heathside and Lethbridge has an existing planning approval and as such the heights for the development have now been established.	No change.

	3	LEA SA 03	I have concerns about the height of the buildings now proposed for Leegate by the current developers, Galliard Homes, as it seems they intend one block to reach 15 storeys high which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - which are 10 storeys high. I think the Local Plan should set a 8 storey maximum height limit for any buildings planned for Lee Green so that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings which would block out light from these areas. This would make the area unwelcoming and unattractive and deter people from using the shops and facilities being planned for the site. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. But to do this any development will need to respect the proportions of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a vibrant community centre and parking facilities especially needed by older people when shopping etc.	Noted. This response relates to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA SA 03	Dear Team, Having lived in the area since 1989, I have seen many changes. Thankfully, nothing as ridiculous as the latest Galliard Home plan for the Leegate Centre Site. This site changed hands for £Few hundred thousand when St Mowden first bought it. Now, with 650 units being submitted, the land could be worth £Millions And let's not beat around the bush, just a £Few hundred thousand will come back as Section 106 The rest, into the Galliard Homes pockets and out of the Borough Meanwhile, we will be living with this monstrosity for the next 10 years > and then the next 20 years as it sits empty waiting for another land speculator makes a play. Meanwhile the Borough will carry the cost of another failed development. Please, have some dignity. Tell the developer what can be done on this site. If you do not know the area – let me know and I'll show you around Density & Height Match the density of the Leybridge Estate Match the height of the Tigers Heads … 4 storeys on any building fronting the roads Peak up to 8 on 2 towers at the back of the plot Add some green > plenty of green Its call Lee Green after all	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

			Have proper spaces between the blocks With Green Space in between And a little water feature [do you know that the Quaggy River is a short skip from the plot ?] Use Flats and apartments A little street level retail space – boutique shops [if you know the area – you will know what I mean] A little small office space Precedent If you green light this clump of building on an inappropriate site > it starts an arms race The Sainsbury's site can be traded up … to match the same height & density So to the Stephen James site Why not add the Pentacostal Church Set an honest and suitable precedent This is not Lewisham Town Centre Representatives You are our representatives You are not Galliard Homes employees, on a profit share You ask, "where do we find space for additional homes ?" It is in front of you Use the space wisely, and get properties built [not more land speculation that your indecision on this site has allowed on this site for decades] The site can take some 250 units Plus a handful of small retail space & space office space --- for local people … serving local people Just look at the drawings The plan is obscene Look at all the green space on the Leebridge Estate Compare that with the Galliard site Make a difference to the neighbourhood Two 8-storey towers – adjacent to Leebridge Four 4-storey blocks … 2 facing Sainsburys and 2 facing the fire station All landscaped Please don't forget about balance > look after the people Badly design & built developments = vacant properties = vandalism, neglect, insufficient funds for management fee = cycle of decline Overcrowding = deprivation Density = squeeze on local amenities Too many units = squeeze on social services Lack of green space = pollution Lack of green space = bleak, unwanted properties > blight You 3 know the site as well as I do.		

			If the history of Leegate tells us anything If the history of “London’s ugliest shopping centre” tells us anything The last thing we need on this site is an ugly, over crowded, ill thought out development Ie just bigger and uglier than the one it replaces Please represent the interests of the area Demand that Galliard Homes make a fair profit from the site by building what is needed Not an exorbitant profit and stuff us for years		
	3	LEA SA 03	Lee Gate Proposed Development: I am a local resident and am very concerned to read the plans by Galliard Homes to develop this site with 3 x 15 storey buildings for 450 homes. 15 storeys will be completely at odds with the current architecture, most of it low rise, max 3 storeys high, with the exception of the 10 storey existing block of flats. This will be a complete eyesore, akin to the ugly high rise development in central Lewisham. I am concerned that 450 homes here will create even more traffic, more overcrowding getting across Lee Green, and more car fumes. We need low rise, green spaces and more trees planted. How is it proposed that the infrastructure will be expanded to accommodate the additional 450 new homes, the traffic is tailing back at that junction at 7am. There is already a huge squeeze on school places, as well as no room at GP surgeries for new patients. I would appreciate the opportunity to review the planning application.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA SA 03	To the Planners The proposed development at LeeGate is unacceptable to any rational councillor or resident. The height and density of the 450 homes is completely out of character with the area and should not be allowed. This is a blatant profit maximisation scheme at the expense of local residents. Not only will the proposal completely dominate the skyline, the local infrastructure will simply not be able to cope. Has the experience with St Modwen taught the council nothing about the motives behind the developers. If Galliard have over paid for the site, that’s their problem, not the local residents. I will strongly object and consider a civil legal case against Galliard and the Council if these proposals are passed by Lewisham council.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the LegGate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

	3	LEA SA 03	I am writing in response to reading about the Local Plan for Lewisham and also the new proposals to redevelop the Leegate Centre. I live in Lee and have lived in LB Lewisham for the majority of the last 23 years. I am excited that Lee is to benefit from new homes and regeneration however I have some concerns. These points should be included in the local plan and be included in the brief for redeveloping Leegate; Building Design & Layout I am worried that the height of the tower in Leegate will be too high and may set a precedent for future new buildings in the area e.g. the proposed BMW garage and Sainsbury sites. I am concerned that any new buildings should complement the surrounding buildings and that height is a key consideration. I don't think the new developments should be higher than the existing Leybridge Buildings. Dense, high buildings worry create dark, unsafe, unwelcoming public areas between them. I would ask that distance between buildings, total height and pedestrian access are carefully considered so that Lee is a welcoming, safe place to live and shop. Increasing local facilities and schools in relation to additional homes I feel strongly that there is a need to build new, affordable housing in our area but the number of homes must be matched with additional green spaces, schools and transport links and capacity. I am the mother of a toddler and am concerned that there are too few school spaces already, it is unfair that we may need to travel by bus or car with primary school children.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA SA 03	Galliards proposed Leegate plans: I'm writing to you regarding the plans to re develop Lee Gate. At present, with the introduction of the LTN in Lewisham, the thought of over another 1000 drivers entering the junction at Lee Gate means that Lewisham will be grid locked. Therefore, it is unsustainable to be building 650 new properties on this small site unless you ensure that the residents do not own motor cars. I live in [text removed] and the barricades mean that I just drive further to get to the same place to avoid the traffic jams. This is the main route from Kent and the only people this affects is the local residents. You cannot stop through traffic by blocking the roads - the drivers have an inelastic demand and have no alternative. How else will goods imported get to their destination without a significant increase in transport costs? Is the borough going to provide more refuse dumps locally? Driving to New Cross from Lee is impossible so the rubbish is being dumped on the streets because the	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The LTN is not part of the consultation and is outside the scope of the Local Plan. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The site allocations set out requirements for public realm improvements to support this approach. The London Plan also has stringent parking requirements which promote car-free development in accessible locations and car-'lite' development elsewhere. As such an increase in homes should not necessarily correspond with an increase in car use.	No change.

			borough makes it impossible for people to dispose of their items and so they fly tip. I thought that we'd had one development with high rises and that has just been knocked down. It was called Kidbrooke. This was on a much bigger site and failed so why will this be any different? The two policies - building homes and preventing road use are diametrically opposed. More people mean more consumption, more cars and more carbon emissions. Without a sensible road use policy, the traffic caused by this development will be horrendous and pollution worse. I therefore object to this proposal and would like my comments noted.		
	3	LEA SA 03	The proposals are not acceptable. They are a dominating mass of building which would overwhelm and be disproportionate in a community of homes and businesses of much smaller stature. The proposals are a cynical over development of a site which would distort a junction which has a listed four storey fire station and buildings of interest. This area is named Lee Green but the proposals have no 'green', indeed the large plane trees would be lost and public space disregarded. Over developing to this extent would set a precedent for the Sainsbury's and BMW garage sites and build problems for the future of our community. During our post COVID-19 recovery period where will the finance come from for schools, health- centres, transport and other infrastructure which would be needed to support a development like this? Where would this sit with the 'healthy neighbourhood scheme' when it would vastly increase the number of vehicles on our streets?	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. Details on the approaches on infrastructure funding are set out in the draft Local Plan Part 4 section on Delivery and monitoring.	No change.
	3	LEA SA 03	The Leegate centre is rundown so it would be great for it to be developed but the proposal from Galliard Homes will not result in a development that complements the area and develops the site in a sympathetic way. The proposed height and density of the development will be out of scale to the surrounding area. There is no need to build to 15 storeys - that will be completely out of character for the area and result in "tower blocks" with little landscaping, dark area and little green space. Lower rise buildings with landscaping and mixed use areas to reflect how we can live post-COVID would be a better way to develop - the Kidbrooke Estate has used landscaping effectively.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA SA 03	At more local level I am concerned about the scale of the plans for redevelopment of the Leegate Shopping Centre. It is important that the redevelopment provides a good shopping and social meeting area alongside new housing, but as a local resident have major concerns about the height of the buildings proposed for Leegate by Galliard Homes, as it seems they intend one block to reach 15 storeys. This is fifty percent higher than the other highest	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update. Leegate Shopping Centre, Sainsbury's Lee Green and Land at Lee High Road and Lee Road site allocations amended to refer to the Old Tiger's Head Pub and/or Grade II Listed Fire Station

			nearby buildings, the flats on the Leybridge Estate, which are 10 storeys high. The current proposals are on a scale that does not fit with the local building profile. Existing older buildings at the Lee Green Cross Road are mostly 3 or 4 storeys, and include a Grade ll listed fire station and a locally listed Old Tigers Head. I would like to see a 10 storey maximum height limit for any single building planned for the Lee Green area and an expectation that most new housing development should be in keeping with existing buildings of 3 or 4 storeys. This would mean that the public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings, which would also block out light from these areas. There is an opportunity to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7, but to do this any development will need to respect the proportions of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. It is important to note that although the existing Leybridge flats are 10 storey blocks they are set well back from the road and are situated in large green spaces. This is very different to the mass of high buildings bunched closely together that appear in Galliard Homes simulated pictures of their proposed Leegate development Given the potential of up to 630 new families moving into the area it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre and increased transport provision: in pre-COVID days it was often importable to get on to trains at peak times with the existing number of residents, and buses were also often full.	The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA SA 03	I am writing in response to the proposals for development at Lee Green. Clearly there is a considerable need for improvement and I respect there is a need for housing. However the provision of additional housing should not come at the cost of depressing the area with overcrowding, inadequate service provision - schools, medical facilities etc. Galliard's proposal for high density housing is not the answer to a housing crisis. Lewisham needs to provide housing of a high standard, respecting the right of the residents of such development, to a quality of life- one that is not crammed into high rise flats adjacent to busy roads. I strongly reject any proposals to develop housing above 3 - 4 storeys on the buildings detailed in the proposals. The development of Lewisham town centre is a deplorable example of poor planning, showing scant regard for quality of life. High rise flats, packed close together, doubtless with privacy issues, close to areas of high road congestion	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			causing harm to health etc. There is no sense of overall design and material use - a total eyesore, This must not be repeated in Lee. I urge the planning committee to scrutinise Galliard's proposals and put the quality of life of potential residents first. Consider the detrimental impact on road congestion - Sainsbury's and other retail outlets will undoubtedly entail higher car usage. Lewisham has some beautiful, well kept greenspaces with a phenomenal skyline visible from many areas - something many of us have come to value highly, during the last year. Don't destroy Lee with high rise development.	Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA SA 03	I have just seen the plans for developing Leegate. I have had little time to consider this in detail, but there is very little detail to study. The following points strike me immediately :- 1) This is a very large development, the projected height seems to me quite excessive and out of keeping. 2) While I understand the need for new homes the addition of some 450 seems excessive for this small area. 3) 450 homes will demand an increase in local supportive infrastructure, this will require financing and further distortion of the locality. 4) The considerable increase in local population which is planned will add, without doubt, to the pollution of an already highly polluted area with increased traffic. I am afraid that I have to record that I am highly opposed to these proposals as they stand at present.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.
	3	LEA SA 03	Leegate Shopping Centre I have already added my comments for the Lewisham local plan on the Commonplace website but today (just 24 hours before the closing date for comments) I understand that Galliard Homes are thinking of building a 15 storey building with over 600 homes on the Leegate Shopping Centre site. This is outrageous! How is the area supposed to cope with these extra residents and their cars especially since the LTNs have made living in Lee very difficult? I am in agreement that this land is redeveloped into a good shopping and social meeting area, with an enlarged Community Centre at street level but the current proposals being discussed/developed by Galliard Homes CANNOT be allowed to go ahead. To construct a block of 15 storeys in height, far exceeds the height of any other building in the area so the Local Plan should state that the expectation of new shops/housing developments should be in keeping with existing buildings of 3 or 4 storeys so that any public areas/green spaces for walking or sitting would not be blocked off from any sunlight. The 3 London Plane trees	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.

			should remain. There needs to be respect for the proportions of the local area. A very tall building would be an eyesore and make the area unwelcoming, unattractive and deter people from using the new shops and facilities being planned for the site. Otherwise Lee Green will just become another Kidbrooke Village or Lewisham Town Centre as the new high-rise blocks in these areas have destroyed any community; they are dark, unsafe, horrible and just a wind tunnel catching the pollution. It is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities which will be especially needed by disabled and older people when shopping etc. The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	The draft Local Plan Part 2 section on Green infrastructure sets out approaches to green and open spaces. In addition, the site allocations for the district centre include provisions for new publicly accessible open space.	
	3	LEA SA 03	Leegate Centre/Galliard Homes development proposal: The proposed development of the Leegate site is not in keeping with the scale of the existing site and its surroundings. Lee Green is not a town centre but a community in which the existing buildings respect the scale and future ones should do so. The density of the proposed dwellings is too great for the area to sustain without major investment in schools and supporting services. And where would these be provided? The height of the buildings would dwarf the immediate buildings and have a major visual impact on the surrounding area. The adjacent Leybridge estate is quite imposing but at least it is in a spacious green setting with trees. The development of Leegate is an ideal opportunity for a design that is both architecturally innovative, green and ecologically pioneering, not just a replica of the architectural follies that seem to be the norm in the 21st Century	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA SA 03	I am writing regarding the Leegate proposed development. I understand that the Council is considering proposals where Leegate could be up to 15 stories high and could include over 450 new homes. Allowing a development 15 storey high in an area where the surrounding buildings are at most four-storey high is simply grotesque. I am opposed to these plans. In addition it would set a precedent for further developers to demand similar increases over existing heights. I would urge the council to oppose such plans. The new development	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

			should be no higher than the existing 10. -storey Leybridge estate, which is already the tallest building in Lee Green		
	3	LEA SA 03	I was shocked to hear from a neighbour in SE12 that Galliard homes have proposed a new scheme and there is only until the 11th to comment. The last scheme proposed by St Modwen wasn't right, and this is even worse. Nothing should be taller than the existing site. Nor should there be more density - it should maintain an open feel. Will it include a primary school? A GP? All things that are already stretched in the area. Please consider the local environment and impact.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA SA 03	I write to express disagreement with the proposed plan by Galliard Homes to redevelop the Leegate Centre. First of all, the only messages I have received as a local resident on Cambridge Drive have been through a local community email group, not from Lewisham council, and further only on Friday, 9th April. It is beyond absurd that a response for comments is expected by Sunday, 11th April. It feels as if there is something wrong going on here. I will point out we all feel Leegate needs to be redeveloped but the proposed plans I have seen are unworkable for local residents and should not be approved. Building height of 15 stories - no way! 630 homes - no way! There should be a limit of 4-6 stories on anything built on that site consistent with the current building (certainly no higher). 630 homes is far too many for that tiny condensed area as density is already an issue. The leegate intersection is already the worst around for miles and it could not accommodate additional traffic from residents of 630 homes. This is crazy. If even half of these houses are built, what new infrastructure will go into the area to accommodate this? The plan makes no mention of any of this so therefore cannot be approved until a full infrastructure assessment on traffic (do not say new residents won't be allowed cars!), what new schools will be built, how many more NHS surgeries will be added, what transport links will be added (we will need a new DLR stop or tube stop nearby before this building is completed as the existing train lines are not good enough to accommodate the current population in normal times. I understand Sainsbury might get knocked down in this process and if so, where is a new supermarket (will need to be larger than existing) going to be built to accommodate all the new homes? There is no other supermarket in the local Lee Green area so residents cannot afford Sainsbury's to not exist for any period of time. Strangely, given the recent emphasis on clean neighbourhoods and bike lanes, etc. All of that will have to be reversed as there is no way the area can support the	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.

			increased density with all the streets blocked off. Cycling will have to be prohibited in the area as there will be a real chance with all the new residents and traffic that cyclists will get killed. It would be a real shame to unblock some of these roads as the area was just getting nice again. Oh well, the council cannot have everything. In summary, a development of the size being envisioned does not belong in this area or the Lee Green intersection. It would be better to build such a development on land out in the country where there is space and less congestion. I truly believe these plans and the little time residents have been given to respond are close to insulting. Let's get LeeGate redeveloped but with a sensible plan that fits the area and is not too large.		
	3	LEA SA 03	We are writing to voice our opposition to the new development proposed by Galliard Homes at Leegate. As residents of [text removed], we would like a solution to the Leegate area. However, the plans that were put forward by Galliard are at a significant cost to the area. 450 homes and tower blocks at 15 stories (or higher!!!) is not an appropriate development for the area. Leegate should not be turned into another Lewisham central with tall block towers and overcrowded streets. The buildings should be 5 - 10 stories in height. No higher than that. 10 stories MAX in height. The proposed structures would dwarf the surrounding areas and not to mention, there is a distinct lack of greenery in their proposal. All we see is a few scattered trees and lots of pavement. 50% of the buildings in Lee are listed buildings and the proposal does not fit with the architecture of the area. This sets a precedent that other developers would build tall towers and blight our community. Now, what about the infrastructure? Where will the children of the development go to school? Our neighbouring schools are at capacity and we would need a new school built to accommodate those children. Leybridge Estate was built and Brindishe Lee was built to educate those children. There is nothing in the plans as to where the children would go to school. Will there be more bus services to and from Lewisham to accommodate the new residents? What about a new secondary school? There is no discussion on how or what kind of infrastructure will be built. What would we like to see in the Leegate area? An area that looks similar to what was done to the Leybridge Estate. You have 1 - 2 towers of 10 stories and lots of greenery around the area. Or perhaps 4 - 5 towers	This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			of 6 stories in height? Greenery and spaces for residents and locals to enjoy. Have a look at the Conington Road area and you will see a small development that doesn't feel like it is intrusive. Housing should be adequately spaced with lots of light and greenery. Space of walking, cycling, and limit the use of cars since our area can't cope with any more cars. More local shops, not another Sainsbury's. We need a space to encourage local shops with discounted rents and revive the area with a bustling high street. We have a few great shops on Lee Road and we don't see why we can't encourage more locals to open their own businesses. Please lodge our opposition to the proposal by Galliard Homes.		
	3	LEA SA 03	I write to you in regards to the proposed development at Lee Gate, which has recently been purchased from previous developer St Mowden's by Galliard Homes. The full plans for the development have still not been made available to the wider public, despite the deadline for public consultations over the Lewisham Local Plan being two days away. The limited information which has been shared so far indicates that the development will include some 450 homes, with some towers reaching a height of 15 storeys. While Leegate has long been under-utilised and in an almost derelict state and must certainly be redeveloped, Galliard Homes' plan would significantly alter the skyline of the local area and increase the density of what is currently a largely suburban, low-density area. The local plan should state that developments in the Leegate area should not exceed the existing height of 10 storeys and, if they were to include 10-storey towers, should not be built in the density currently proposed. A density similar to that of the Leybridge estate would be more appropriate. Furthermore, public services in Leegate and the local area are already under serious strain. Traffic is a significant problem at the Leegate intersection, queues at Leegate post office regularly last for an hour or more, and trains through Lee are already filled to capacity during normal non-pandemic times. The homes in the Galliard development, as with all other newbuild developments in the area, will be marketed towards commuters working in central London. The addition of 450 new homes will therefore place huge amounts of strain on the local transport services, which could become unmanageable without the necessary public investment. The local plan should include provisions for further investment in transport links and public services in the Leegate area.	This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA SA 03	I have been made aware that plans are afoot by Galliard Homes to redevelop Leegate with new homes that will be in a development as tall as 15 storeys high…!	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to	No change.

			I also understand that the tallest buildings in the surrounding area are no more than 4 storeys high…so I think it is fair to say that this is very much out of keeping with the local area and could set a dangerous precedent. I would strongly urge not to accept such plans and instead suggest a design more in keeping with the local geography.	express their views on the scheme through the Development Management process.	
	3	LEA SA 03	Density Welcoming both new residents and new housing would be expected but the council has entertained proposals for Leegate Centre over the last few years that many people find unacceptable in terms of housing density. Being told that PTALs and guidance on housing units per hectare are no longer going to be used has left people at a loss as to how to discuss just what is "high density". In the confusion it appears that developers are getting greedier and greedier and that council officers and members are spinning in their race to meet targets that few local people support. The Mayor of London has said that a supplementary planning guidance will be issued to assist councils apply density policy. This guidance will not be subject to consultation and has not been published yet. The ambiguous language of the London Plan is reflected in the draft Local Plan. In the draft Local Plan we have a few words on density but it would seem that Galliard Homes are not being asked to look even at this developing policy. Part Two sections 5.6, 5.32 and 5.51 along with QD6 appear to be relevant but have been ignored. It appears that the Galliard Homes proposal is allowed to play the trump card of "1,667 new homes a year" that allows all other considerations being ignored – height, bulk, employment, heritage, density.	Noted. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The Local Plan is required to be in general conformity with the London Plan. The new London Plan 2021 has removed the 'density matrix' and development proposals must now demonstrate how they will deliver the optimal capacity of a site using the design-led approach. The draft Local Plan takes this direction, and sets out additional policies to ensure that proposals have regard to the site context, including local character and heritage.	No change.
	3	LEA SA 03	I am writing to express my concern about Galliard Homes proposed development on the Leegate site. The suggestion that the development could be up to 15 storeys high seems to be completely out of scale with other properties in the area and also sets a worrying precedent for other possible developments in the area. What extra provision is being made for local infrastructure and facilities (schools, doctors, traffic etc.) if the proposal for up to 630 new homes goes ahead? We went through all of this when St Modwen made their ever escalating proposals for the site. I realise that the site needs to be redeveloped and that it is an ideal site for new homes but not at the expense of the aesthetics and sustainability of the existing community. The changes to traffic flow in the low traffic zones have already greatly increased the traffic on Burnt Ash Road and the Tigers Head junction, such a large development on Leegate would only make this worse, with knock on	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The site allocations for the district centre make provisions for public realm enhancements to support this approach. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.

			consequences for pollution which is already above acceptable levels. Don't destroy the character and sustainability Lee Green by waving through these proposals (which seem to have had very little public exposure or input).		
	3	LEA SA 03	I have just read about the new planned development for Leegate and was very concerned about the architects plans I saw. I have been a Hither Green/Lee resident for over twenty years and feel that the plans proposed by Galliard Homes of 450 units would be detrimental to local life. 1. From a visual viewpoint, I am concerned about the impact that modern fairly low quality building would have on an area which mostly consists of period victorian housing. It looks quite similar to the developments in Kidbrooke village and I cannot see how this would fit in in our area. I am particularly concerned about the 15 storey height of the development which would completely ruin our area. 2. This is an already populated area, with little extra space for parking. Where would the cars of future inhabitants go and local residents already struggle to find a parking space? 3. Local primary and secondary schools are already over-subscribed. The International Academy of Greenwich which had been planned in the fields opposite is now closing as the council refused planning permission. Where will the children of these families study? I therefore oppose the plans as they currently stand and would urge the council to reconsider their decision.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The London Plan sets more stringent parking standards, and the expectation is that new developments within the town centre will be car-free or 'car-lite'. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan	No change.
	3	LEA SA 03	LEEGATE 4.The Council will recall all too vividly the lengthy dialogue with St Modwen before they sold the site. A number of important parameters were established then than must not be lost sight of. There will clearly need to be full and effective consultation on the proposals that emerge from Galliard Homes. 5.As we recall it, the original St Modwen proposals some years ago did not offer enough housing, particularly public housing. However to go to 600+ units from the last St M. figure we saw which was 400- will surely overdevelop the site.The blocks look to be too high ,overshadowing other parts of the area. We also need to retain small scale useful retail units- pharmacists, hardware, newsagents, gyms, cafes. Some space for community provision and services would also be essential. Some of the accommodation needs to be in family houses and not just flats. Then there was agreement at an earlier stage that some public open space needed to be retained in any redevelopment. Finally, the more units, the more the problems referred to at 3. above	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

	3	LEA SA 03	Why a Section S215 Notice under the Town and Country Planning Act 1990 was never issued to St Modwen defies belief? Maybe in the light of the Fly tip that is the Council's Local Recycling Bin area on the corner of Leegate that blights the Square and Trees, one should be served on themselves? The Plane trees are pollution busting assets which have not had the TPOs restored as they should have once the ASDA fell through. They have given service for years and will continue to do so for quite a while yet. They co-exist with the splendid line at Leyland Road and are undoubted habitat for many species. These should be the starting point for a green square with the existing throughput away from pollution. I show photos of the rubbish attracting alley at Osberton Road which is now the access to Cambridge Drive as an illustration of when the Council built over the road.	Noted. This response seems to be relating to proposals previously prepared by St Mowdens for the Leegate site and is not part of this Local Plan consultation. Both the adopted and draft Local Plan include provisions on tree retention, and where necessary replacement. The assessment of any trees lost as part of any future proposals for Leegate will be made through the Development Management process and residents will have the opportunity to express their views as part of the statutory consultation.	No change.
	3	LEA SA 03	Having seen the proposals regarding Galliard Homes for Lee Gate I am horrified. The idea of more high rise buildings in any part of Lewisham is terrible. I address the following: Housing type - firstly Lewisham lacks medium to low rise safe social housing, we do not require anymore large, imposing buildings in Lewisham. Experiencing the ongoing works near Lewisham Station has the infrastructure been taken into account, where are these tenants going to be parking, more fumes, more traffic and already we have roads closed to "make things better" but actually forcing more traffic onto the main roads, slowing all journeys. In general appointments already take forever, the occupants will need to GPs, schools all services anyone living in their borough deserves and these are already pushed to the limit. The trains at Lewisham and Hither Green (the most popular stations) are like rush hour all the time since the new blocks in Lewisham as these are the best routes home, Lee and Blackheath are two platform stations and it would mean the same for them. Stations I consider comfortable to travel from. Maximum height - if approved this should low to medium rise, the road widths are too narrow this is not the US, the path down to Deptford already has too many tall buildings, it is imposing the traffic is ridiculous and if the housing does not have enough parking, then this will cause an additional issue. This should be considered for all three sites. Lee is an area where you meet people who have lived here for over 30 years happily due to what it looks like, its proximity to services, trains. In general, intense additional is a bad idea, it is already priced people out of the market when it comes to buying with the ridiculous "Blackheath borders" tag of the last 5-6 years allowing agents to value properties ridiculously. If the idea is to attract I feel it will make the affluent leave if they are surrounded by more traffic, it is their voices that are the loudest on social media when they cannot get from A to B without driving all around all the place, if the parks are packed and they cannot get a GP appointment for	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The draft Local Plan sets a strategic target for 50% of all new homes to be genuinely affordable. Further details are set out in the Part 2 section on Housing. Planning applications will be assessed against the extant development plan policies. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			weeks due to the surgeries trying to serve their communities, will they stay. They will move out for more space and less competition for local amenities. If the idea is just income, the supply of more affordable housing would be the best option, there are a large amount of people paying too high rents who would love to stay in this area and contribute for the longer term but with this plans you chase the further afield. Any plans that encroach on the quaggy, the park or any of the views and spaces are a bad idea, which are what attract people to the area, not high rise ugly flats as those in the middle of Lewisham and enroute to Deptford. The housing in the area is already quite intense it would be nice to have space thoughtfully occupied.		
	3	LEA SA 03	Lewisham's Local Plan and Galliard Homes proposals to develop Leegate: 2. Re Height It is proposed that the height should be 15 storeys which is 37% higher than the nearest high rise block and totally out of keeping with the older buildings nearby which are at most of 3 or 4 storeys and some of which are listed. The proposed development does not fit in with the local area and furthermore appears to contravene the London Plan which provides that tall buildings should only be built where there is infrastructure and transport links to support them. As I have said earlier this is not the case here and there does not appear to be any provision for this, indeed there would be nowhere for it.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA SA 03	We would like to respond to the consultation on Lewisham's Local Plan as people who live in Lee Green. We are very concerned by the plans we have seen from Galliard Homes for the Leegate Shopping Centre site, and in particular by the proposed 15-storey tower which would dominate the crossroads and surrounding area. As people who walk across the crossroads at Lee Green all the time, I would not want to see the environment in that area, which already suffers from traffic and pollution, made worse by the building of a tower which is completely out of scale with surrounding buildings and would block out light. We think the Local Plan should specify a maximum height for developments in Lee Green which should not be any higher than the existing ten-storey residential blocks, which are also set back a considerable way from the road. We are equally concerned that Galliard are suggesting the site could accommodate up to 630 units. As far as we are concerned the 450 units proposed by St Modwen in its plans, which we saw at the local library, is the absolute maximum that should be allowed on the Leegate site. Again, it would be sensible to include a limit in the Local Plan so developers have a clear understanding of what would be suitable. We are disappointed that, given the comments already made about the Lee Green area in the Local Plan, that Galliard should propose a housing density	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The site allocations for Lee Green district centre include provisions for significant public realm enhancements to support this approach.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			that would be very damaging to our area and totally out of character. As the Local Plan states, a successful redevelopment of the Leegate centre is crucial to the future of Lee Green. The redevelopment will bring more traffic to our already crowded roads - there will be more people in our busy local parks, needing medical treatment, in our schools and on our trains. So both for their sake and for ours, it is really important that we do not sacrifice in the process the good things about Lee Green - the greener and more suburban character that you mention in the Local Plan, and I would add the attractive and friendly environment.		
	3	LEA SA 03	I am writing to you to object to the building of a 15 storey high rise block in Lee Green. Tower blocks are not the best way to house people – architects should be made to live in such blocks to see how inconvenient they are. Also they throw huge shadows and will also overlook all the houses in the surrounding area. People with families prefer to live in a house with a garden so that children can play safely under the eyes of their parents and not playing 15 storeys lower where parents cannot safely let their children play. Lee Green is supposed to be an area where it is pleasant to live and erecting such large buildings which will tower over other buildings and homes is not the way to go. I hope these thoughts will be taken into consideration at the next planning meeting and also that all Lee Green residents will be informed and enabled to attend any such planning meeting before final decisions are made.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA SA 03	We wish to register our strong objection to the plans by Galliard to build 630 new homes in Leegate. The infrastructure does not exist to support the thousands of extra people that will be living in these homes. Where are the schools, health facilities, public transport, the shops including places to eat and drink and the green spaces that will allow people to relax and unwind? The services currently available in the area will be overwhelmed. Has any major funding been allocated to this project? The Lee Ward already receives the lowest amount of funding than any other ward in Lewisham. No building should be fifteen storeys high in this area! Five storeys high at the most. It sounds as though Galliard just want to pack as many people into an area regardless of the cost to those people or the people already residing in that area. We live on Burnt Ash Road and the traffic, especially since the Low Traffic Neighbourhood scheme was implemented, has been horrendous, slightly eased since the tweaking,	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public	No change.

			but still of a very high volume. The Leegate proposal will just add more people trying to access an already polluted, high volume traffic area. The plans do not fit in with the aesthetic of the area. There will be a huge monolith of blocks of flats rising up at one end of Burnt Ash Road out of keeping with nearby buildings. Will there be balconies built into the design of these flats that will be big enough to accommodate a small table and chairs so people can have some small private outdoor space? This is vitally important for people's well-being. Balconies have been built onto every new block of flats in the centre of Lewisham and in Kidbrooke. This consultation is rushed and it is quite disgraceful that people in the local area have not been kept informed and given enough time to consider these proposals.	transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The site allocations for Lee Green district centre include provisions for significant public realm enhancements to support this approach. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. Details on the approaches to fund infrastructure are set out in the draft Local Plan Part 4 section on Delivery and monitoring The London Plan includes minimum internal and outdoor amenity space standards, which all development proposals must comply with. The draft Local Plan proposes to take forward these space standards.	
	3	LEA SA 03	I object to this development in the form proposed by Lewisham and Galliard. I live near the site of this proposed development at the address below. (Note: address redacted by Council). If the development materialises at the scale, density and proportions implied by the plan conceptual drawings provided, it will be a most insensitive imposition that degrades the already poor quality of the built environment around the site e.g. Leegate precincts;. It will become a blight on the area before the shine wears off its cladding panels. Evidence - the hi-density megablock structures that we have seen thrown up along the riverfront in Greenwich (destined to turn into a sterile and unpleasant ghetto, and already showing the signs). The proposed structures are gross and overbearing and charmless and of intimidating dehumanising scale, "carbuncle" etc.. Imagine huddling in those dim cold canyons between the massive buildings trying to light a fag in the wind tunnels? The only relief might be graffiti. The proposed accommodation implies an increase in local resident density that far exceeds the capacity of the local retail, health, schools, leisure and other facilities available in the area, which is already borderline in terms of its capacity in these aspects. Local school catchments (for the schools that people want to get into) are already measured in envelopes of tens of meters. If this goes ahead almost all of the people who live in it will be off to Lewisham and Catford for the shops. Why not put them in Lewisham and Catford and reduce your carbon footprint and stop particulates and NOx from all the buses?	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The site allocations for Lee Green district centre include provisions for significant public realm enhancements to support this approach.	No change.

			The proposal ignores the physical reality of the site. The high density blocks on the Riverfront in Greenwich etc. sit within the expansive "riverscape" which grants some relief and space around the monolithic buildings. But such towering buildings are not appropriate in a location hemmed in on all sides by roads and lower building frontages, and no surrounding open vistas/sightlines to provide perspective and scale in which the buildings might be looked at so that at least they look like aesthetically interesting objects (even if nobody really likes living in them). I suggest something more sensitive like what has been done in Kidbrooke Village? Presumably the answer is that there is not enough area on the Leegate site so you can't get the bums in beds. So the developers want to go upwards and not sideways. In this setting that is a recipe for disaster that will bestow upon Lee a bigger Leegate eyesore than what we already have. Might it be wise to attend to lessons of that failed project to avoid repeat the planning and design errors of the past?. I am in favour of a sensitive smart city sustainable green infrastructure style redevelopment of this site - and something like a Kidbrooke Village style approach to the scale, green corridors and space etc. might work well. It should not include a tower block, and it should be designed to integrate into a corridor of increasing greenness and leafiness along the axis of Burnt Ash Road - Blackheath. Keeping that in mind the tower block will be much better fitted in at the Lewisham town end of the Lee-Lewisham axis. In other words my suggestion is the very obvious one - knock Leegate down, put something of no more than four storeys on the site with some nice trees and bistro's etc. Add some smart things like tech businesses, arts, etc. Face reality - there is no room here. Keep the high density housing in the places which are the natural homes of high density accommodation - i.e. the urban centres of Lewisham and Catford where all the shops are. Then the Borough will end up with a smart clean working town centre and a low density nice leafy suburban parts. I do hope this does not get further serious consideration. If it does I think it would show that Lewisham Council has a pretty disdainful attitude to the sustainability of our community and the quality of our local environment. I have long been surprised that the Council seems to think it's acceptable for people to continue living in the Leegate complex in its current state of decrepitude. St Modwen should be ashamed of the state of the place. Perhaps they are but can't do anything. Please register my objection to this proposed development. I suggest this proposal really does need re-	As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	

			appraisal and re-design at a fundamental level. It seems so thoughtless proposal that I wonder if it has been put out as a provocative opening gambit to elicit reaction from local community members about what they really want! No doubt it will be effective in that, but will it do any good? I haven't made much comment in the past but I believe the Lee community has been telling the Council for several years what it wants in relation to the St Modwen Leegate redevelopment, but those inputs must have, largely, been ignored judging from this Galliard proposal. Presumably if there is no room to build anything the Govt will relent on its exhortations to Council to build more. Is the Council looking at it from that point of view? I am sure if you took Boris Johnson to Leegate and showed him what you are proposing to build on there he would tell you it's bonkers. Has anyone thought of that?		
	3	LEA SA 03	Leegate - new development proposals: Having briefly seen some of the proposals I am concerned about the adverse impact on the neighbourhood and the environment. Please send further details of the above proposal as I wish to comment urgently - regards - John Bevan. - I have concerns about the height of the development proposed and believe that this is a case of overdevelopment on behalf of the developers! - Does the development takes account of the urban grain and context of the site! Currently this seems most unlikely! - What studies have been carried out to ensure that the resulting traffic is not going to cause yet more pollution on surrounding roads to the detriment of those living nearby? - With the amount of homes being proposed the adverse effects on infrastructure must be very serious. What is proposed to alleviate this? Are more GP's surgeries being proposed and have local hospitals been consulted about the impacts of this proposed development and what about the impacts on existing schools? - What conservation of environment has been considered? With the current climate crisis what measures have been taken to ensure that the buildings proposed do not contribute to the detriment of environment and to ensure positive standards of insulation and the embodiment of green energy? - As regards design and planning it is important that the spaces between buildings is as important as the buildings themselves - to provide a cleaner and more healthy environment, including more open, green space. - It appears here that too many buildings have been crammed onto the site. Overdevelopment again!	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

			- What account has been taken in planning the housing with the need for more home working and the inevitable spatial consequences for the planning of living areas? - How much consultation has been untaken with local residents and retail premises? Subsequently we all have to live with the consequences of the Councils development decisions. Please let this development be an exception to often poorly built planning and development, and to create better and more humane living and working spaces.		
	3	LEA SA 03	I object to any 15 story buildings being built in Lee green. The maximum I would be happy with is 5 stories. If more housing is built, where will these people work? They will have to travel on the already busy trains and buses. They will contribute to the already busy roads if they are car owners. I hope that local business will be able to thrive? Especially charity shops seems SWOP as they are good got the environment and this is EXACTLY what should be the main focus. I also hope that access to the river will be made.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The draft Local Plan Part 2 section on Economy and culture sets out approaches to grow the local economy, recognising that Lewisham has one of the lowest jobs to resident worker ratios in London. The revitalisation of the district centre will support this objective. The draft Local Plan makes provision for a wide range of main town centre uses within Lee Green district centre. However to support the viability of the centre with a flexible policy approach, it does not specify the nature of business activities sought. The draft Local Plan makes provisions for river restoration and improved public access to the Quaggy and other rivers.	No change.
	3	LEA SA 03	High rise developments and Leegate Leegate shopping centre has been bought by a residential developer who plan to replace the shopping centre with a high rise development completely at odds to its historic surroundings. This area fronts a junction and would completely dominate and overshadow the four other historic corners which consist of Victorian buildings if no more than four to five stories in height. The local plan should protect areas such as this from high rise development. Family apartments and family housing mixed with independent retail that aesthetically matches the other three corners would befit this area which acts as a gateway to Lee Green. A shaded, windy corridor caused by faceless high rises does not. Lewisham Gateway has already suffered from a disconnected look and feel of high rises. This is the council's opportunity to show they can work hand in hand with developers on sympathetic redevelopments that add character not take away from an area.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The London Plan, and draft Local Plan Part 2 Design section, include policies which address amenity, and in the case tall buildings, microclimate.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA SA 03	I would like to reply to the Galliards plans for Leegate. I haven't had time to look at them in detail but what stood	Noted. This response seems to be relating to proposals currently being prepared by Galliards for	No change.

			out was the large number of dwellings and the height of some of housing. This is a busy residual area already and the I'm not sure that for the couple of thousand extra people you propose to move here it will be a good experience. The height of the buildings is a real problem and would impinge on an already crowded area. They would dwarf the few attractive buildings around Leegate. How are these plans going to help or improve the area of Leegate? Will this number of dwellings be needed in the future? More people are leaving London and house prices in parts are already going down.	the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The latest population projections issued by the Greater London Authority indicate that whilst Covid-19 and Brexit have had short term impacts on migration patterns, London is forecast to continue growing over the long-term.	
	3	LEA SA 03	Leegate shopping centre development: I do not support current proposals being developed by Galliard Homes for the Leegate shopping centre. The area does need redevelopment but the plans put forward do not enhance the local environment or economy. Considering the past 12 months' of lockdown we've all had to live under, the proposals fail to provide these new residents with adequate green space, Blackheath, Greenwich park, sutcliffe park and manor house gardens are already very busy and attracts people from miles around. The nearby Edith Nesbit park is not an inviting or adequate space to accommodate potential 630 plus residents. The height of the development is a safety concern especially as the windows of the apartments will directly overlook pavements - this is dangerous! There is no indication how they will deal with the further drain resources in this area - i.e. impact on schooling. The new development will increase traffic and pollution in an already busy area. I hope you take my concerns into consideration.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA SA 03	In response to the consultation period for the Lewisham Local Plan, I am very much against the Galliards proposal to build up to 15 storeys high on the Leegate site. This is inappropriate and does not appear to be in compliance with the Local Plan. It would overshadow existing historic buildings and is likely to present dangerous shadowing and glare for the Lee Green junction, already the site of recent fatal accidents. The number of residential units would also require considerable increases in local infrastructure. Nowhere does Galliards appear to wish to contribute locally to amelioration of their plans impact on the neighbourhood. Please take these points into account when looking at the planning application.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. Planning applications will be considered against the extant development plan, having regard to any material weight afforded to emerging plans and the statutory stage they are at in the plan-making process.	No change.

	3	LEA SA 03	I am horrified at the plans for a 15 storey development at Leegate. I consider a development of no more than 5 storeys more suitable to the surrounding area. Any more than that would mean that the residents would not feel part of the strong community in the area.	This response seems to be relating to proposals currently being prepared by Galliards for the Leegte site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA SA 03	I approve of building more homes, but I think we need to ensure proper provision of surrounding facilities. The traffic situation along Lee High road is worse than ever since the bus lanes were made 24/7 and more housing can only exacerbate this. I use the Sainsburys every week so want this to remain. I would not like to see buildings above around six storeys and hope there will be provision for green space and play areas. . Leegate has been an eyesore for years and it is surely time to fix it, but high rise and no neighbourhood provision is not the right solution.	Noted. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The draft Local Plan site allocation for the existing Sainsbury's site would enable the reprovision of a supermarket. The draft Local Plan site allocations for the Lee Green district centre make provisions for significant public realm improvements, including publicly accessible open space.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA SA 03 LEA SA 04 LEA SA 05	I have just been made aware of the new plans for Lee Gate redevelopment. The scale of this redevelopment is beyond what the local infrastructure can support. The local primary school is one form entry with a catchment area which does not always extend beyond Burnt Ash Road. The local GP surgeries are small and already at capacity. The local private nurseries are over subscribed. The train stations in either direction of this redevelopment are already running very busy services with no plans for more trains to run through these stations. The size and height of this redevelopment is unsympathetic to the local area and sets a president for future high rise buildings. The redevelopment of the area surrounding Lewisham station is warning of what could happen to this junction. Tall buildings overshadowing a busy road do not make very pleasant walk ways. Further to this I do not think that the Sainsbury's site or BMW garage site should be included in these plans. This redevelopment is showing a bad side to big business and town planning placing profits and targets before local	Noted. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The remaining points seem to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. It should be noted that the National Planning Policy Framework (NPPF) makes it clear that Councils should	No change.

			communities. This is not what should be built here, in an area where previous attempts have been made to secure the historic nature and importance of the area. Any redevelopment should not exceed in height what is already here. A maximum of three stories would also not overshadow the local historic buildings. Any redevelopment should be sympathetic to what was here before. Developments of these kind would improve the area socially and economically as it would make the area more desirable and inspire a greater sense of community. Redevelopments which work with local communities have better long term outcomes for all involved rather than a short term goal of quick development. The fact that these talks have not been made public also illustrates an understanding of the strong ill feeling these plans will produce. Again smacking of profits over people. In a time of mayoral voting these things should be more transparent and open.	proactively enter into Pre-application discussions with developers and work proactively with developers to resolve issues prior to an application being made. This pre-application process is confidential. The Council in this regard is simply undertaking its statutory duty as per the NPPF.	
	3	LEA SA 03	I'm writing to object to the Gaillard Homes Leegate planning proposal. This plan proposes buildings that are two high and occupation that is too dense. The proposals breach guidelines from the London Plan, Lewisham's Tall Building guidance and the advice of Historic England. The buildings will completely spoil the architectural and lived-in environment, radically reducing space, dominating the listed and other local buildings and distorting the amenable, human scale that currently characterizes Lee. The practical concerns that the plan raises are no less alarming than the environmental ones. No significant infrastructure is proposed to accommodate occupants of 450 residences, whose health and education will have to be catered for by other local already-overcrowded schools and health facilities. The traffic problems that already exist in Lee will become much worse. Both new and current residents in the area will be harassed, cramped and beset with many more day-to-day privations and challenges than they currently face. I am not of course objecting to development in Lee in general, which can and should happen. Yet the Gaillard development will only significantly benefit the developers, Lewisham Council and any commercial facility that will be on the site. It obviously won't improve the quality of life of current residents or offer adequate space and facilities for new ones. Please take these considerations seriously and think about your residents as well as your financial imperatives. Consider the huge developments in the centre of Lewisham and ask yourself honestly how many residents that lived in the area beforehand think their lives have been improved by them. If you think local people are happy with these developments, then I suggest that you're either being disingenuous, or you don't know your residents well at all. Please don't make the same mistake in Lee.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA SA 03	Regarding the Lee Gate plans. We already have a significant number of new high rise buildings due to the	Noted. With regard to the indicative capacity for the site allocations within Leegreen we appreciate that	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			Kidbrooke development and do not need more in Lee Gate. These are a blight on the landscape and difficult for upper floor residents, especially during lockdowns when they are stuck inside without regular access to a green space. We do need housing but Lee Green also needs a green area for children, more trees, leisure facilities and local shops. We have a supermarket at Lee Gate and any expansion of this is unnecessary with other large supermarkets serving the area, based in Kidbrooke, Eltham, Lewisham. Lee Green could be a beautiful area. We already have established Victorian buildings which with some thoughtful landscape surrounding could transform the area.	this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The draft Local Plan site allocations for the Lee Green district centre make provisions for significant public realm improvements, including publicly accessible open space.	
	3	LEA SA 03	I am writing to submit my views on the consultation of the draft Local Plan for Lewisham. I am aware that Galliards Home's have purchased the site at Leegate, Lee Green which faces directly on to my home in Eltham Road, [text removed]. I understand Galliard Homes are in consultation with Lewisham Council with regards planning proposals on the Leegate site which involves a proposal to build up to 450 units on the Leegate site. I note that these units may well be up to 15 stories in height. Lewisham Local Plan does not include any guidance with regards height limits at the Leegate site. This is in contrast to the Lee Neighbourhood Plan which states that "building height should be in keeping with the surrounding buildings including the building design, mass, scale and detailed design and that generous set backs and public realm are included in order to build human scale".	This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA SA 03	Please do not build excessively high buildings in Leegate which would not be sustainable by local infrastructure. 15 stories is too high and the plans show a group of buildings with no green space, soulless and bleak.	This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA SA 03	I live in Lee. The proposed images of Leegate are truly awful. 15 stories within a small area is totally overbearing. This area has huge traffic problems already so the ambition to build so intensely is environmentally irresponsible. There should be a community development in line with the area and not a high build complex. It is without any consideration for the history of Lee. A community	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

			development supports local people with facilities and shops to aid them. This looks like a money grabbing, cynical development and not in line with the values a Labour Controlled Council should support. You need to consult with your community...you're not some Tory Council who doesn't care about the hearts and minds of its community so please rework with us working with you.		
	3	LEA SA 03	I am shocked to learn that Lewisham Council might approve the plan proposed by Galliard Homes for Leegate. This plan includes 15-torey high blocks. This is a monstrous development for Lee Green, if allowed by Lewisham Council. The highest building currently in Lee Green is 10-storey. What about schools and medical services for such a development? Don't children and families in this proposed development need such services?	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA SA 03	Dear Planners, I am writing on behalf of my wife and myself - two local citizens. Due to the pandemic it has of course been impossible for gatherings like the local assemblies where local people can consider and discuss developments as those proposed for Lee Green and Leegate in particular. In the Plan the first objective is to re-establish Lee Green as a "welcoming and thriving commercial and community place." It seems that our planners have handed over control to a developer, Galliard, to decide what is going to be done. What is being proposed by the developer is way out of scale of what the local community wants and deserve. We are strongly against what is on the table right now.	Noted. The Local Plan consultation is being carried out in accordance with the Council's adopted Statement of Community Involvement. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA SA 03 LEA SA 04	I would like the following added to the above plan; No building on the Leegate site or Sainsbury site to be taller than 10 stories. Where new builds are next to listed buildings they must be no taller than the listed building Dwelling density to be no higher than leybridge court. More money must go in the plan for infrastructure. In particular, for schools, and for off road parking.	Noted. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

	3	LEA SA 03	I have a flat at [text removed]; could you please let me know my flat is affected by Leegate Shopping Centre development? If I lose my flat for new development I need a new flat in new development. I need a 3 bed room flat.	The Local Plan is a strategic policy document against which any future planning applications will be considered. We would recommend that you contact your landlord for further details on any emerging planning application and how this may affect your tenancy.	No change.
	3	LEA SA 03	Leegate shopping centre has been taken over by Galliard Homes, who propose to build over 400 flats, in blocks of up to 15 storeys high. This is too much for this area. The public transport is already overcrowded at peak times, and there aren't enough schools or doctors surgeries in the area to cope with so many more people. Not to mention the environmental concerns of water supply, sewage removal and refuse/recycling collections for 400+ extra homes. Earlier proposals, under the previous owners, were more agreeable: a tasteful shopping area, with independent shops, a reasonable amount of new homes, some allotments and a pedestrian seating area. Something like that would work, but not the high rise estate that has now been proposed. Also, I hope you have dropped the plans to shoehorn new houses and flats into the Effingham Road garages. This was discussed at a meeting a year ago and we, the residents, put our objections to the architects/councillors at the time.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA SA 03	A friend has today alerted me to the proposals for Leegate. Having lived in the Borough of Lewisham for 19 years I feel it appropriate to respond to this proposal having deep knowledge of the local area around Leegate. During those 19 years I lived in Lochaber Road, Courtlands Avenue, Harland Road and now Kingsand Road. Having shopped at the Sainsbury's for most of those years (12 years total), and passed through the intersection as a pedestrian, cyclist and driver I have intimate knowledge on the multiple redesigns at this major intersection, some which were from memory replaced several years later due to the design being inadequate. I moved this year to Kingsand Road, and the traffic calming and quieter neighbourhoods implemented in 2020 with initially no consultation. So I have first hand knowledge of the extra traffic that has been pumped out onto the main roads and the intersection of Burnt Ash and Lee High Road. Moving home is time consuming and the roads I had used in my previous move from Harland Road to Ladywell, was no longer a 'legal route'. The quieter neighbourhoods meant that what should have been a 15-20 minute journey each way, became 45 minutes to 75 minutes dependant on traffic volumes. So I can say first hand that if there is limited or no infrastructure budget for the Leegate proposal - an Underground station, DLR station, additional buses (for workers NOT school children), widening of roads for dedicated cycle lanes, then an additional 450 housing units	Noted. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The site allocations for Lee Green district centre include provisions for significant public realm enhancements to support this approach. The remaining comments seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to	No change.

			will add more congestion to an already highly congested area. On this basis alone I object to the proposals. Part of the reason I have lived in these areas is that I like the local community feel, the low rise housing and buildings in and around the Lee / Hither Green (Blackheath Borders side) area, the style of the buildings and that it has become a conservation area. Why is the council not building low rise 4 story max in line with existing height of properties in this area? If the council has to provide local housing why not “own the land” and build on it so that it has a modern and affordable housing stock? Long term I believe this to be preferable to a house builder profiting from building high rise apartments and then arguing about how many affordable properties they have to provide. My understanding is that on every recent development in the borough the developer has successfully reduced the number of affordable housing units. 15 stories feels like other local properties adjacent to the proposed development will be dwarfed. 15 stories in height also feels out of step with the conservation area requirements and building restrictions. The building alone on this site will add additional heavy traffic vehicles to a road system that is already at capacity.	express their views on the scheme through the Development Management process.	
	3	LEA SA 03	I have seen the plans for Lee Green and surrounding area and would like to express my absolute objection to what is being proposed. The main objections I have is are listed below: 1.The height of the proposed buildings. There is no way that a small community area should become dominated by such huge buildings. They are obscenely high and it would totally block out the skyline and make the area so heavily overpowered by huge buildings. I understand the need for increased housing in London, but this has to be balanced with sensible developments that don’t impact negatively on people's lives. These new developments should not be higher than the current buildings. 2.Galliard plans propose 450 more housing units. How is the local area going to cope with such an increase in popluation with not enough amenities to meet the needs of all of thoe people who will then be living there? Where are the schools and doctors surgeries that will be needed to accoodate these new residents. 3. There has been no local consultation. People who live here were fully involved last time when St Modwen were propsoing new buildings for the Lee Gate space. All local residents must be consulted.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. Any major application will also assess the impact of the proposal against infrastructure requirements. It should be noted that although the Council does encourage developers to carry out pre-application consultation with residents there is no statutory	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

				requirement and this is at the discretion of the developer.	
	3	LEA SA 03	I have recently learnt about new proposal for the Lee Gate development by Galliard Homes. I am a local resident and I really enjoy living in the area. However, after reading the details I have my points of concern that I would like to share, please see below: 1. The height of the 15 storey building - does not match existing landscape, exceeds buildings around and increases population in already busy space. 2. Over 600 new houses - I don't think existing nurseries, schools and GPs and dental surgeries will be able to cope. Will this be addressed by the council? I am also concerned about additional traffic that will be added to/around Lee Green area- as you might be aware the pre-covid situation lead to enormous traffic on the connecting roads. 3. Will new proposal include/ will be required to include: green spaces, playground, communal spaces (as Lee Gate currently play big role in hosting activities run by local communities)? 4. Lewisham Council planning team will allow another towered development that will become another front runner for the Carbuncle award - where local community is not consulted and only height and the amount of sold flats count without thinking how it will all work for families that live/ will be living in the space. While I would like to see Lee Gate being developed I would hope it can be done without impacting the quality of life of existing residents. Where we still have enough schools, can see a doctor where required and are not surrounded by 15 storey towers. I appreciate making decisions like this is difficult and finding a balance and satisfying all involved parties is challenging/ not always possible but would hope the planning team can listen to our/residents voices and address our concerns.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA SA 03	Lee Green/Leegate Proposed Development: My concerns about and objections to the proposed development are the following: • Some of the buildings are too high and will dominate the area - the design seems quite ugly • The design is very unsympathetic to the existing architecture of the area • The local area does not have the infrastructure (schools, roads, parking places, GPs) to cope with such a large increase of housing and population • The Lee Green junction is very busy already and there are regular traffic jams which will be increased with higher population and private vehicles	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			• There are already excessive amounts of pollution on our streets and the increase of so many homes and resulting vehicles will add to that • I am not sure if there are any green spaces or community hubs? Lee Gate used to be a pleasant shopping area years ago with stores such as Boots and Woolworths as well as independent shops and planting which made it an attractive area to walk through. I hope all local residents' views will be taken into consideration.	transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The site allocations for Lee Green district centre include provisions for significant public realm enhancements to support this approach. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	
	3	LEA SA 03	I would like to register my strong objection to the possibility of a 15 storey tower being built at Leegate by Galliard Homes. The previous St Modwen proposal was, in my view, far superior as it offered a much lower construction height as well as a mixed residential/retail development and was far more sympathetic to the local area. I supported that St Modwen proposal and was unhappy when it did not proceed due to some changes being required by Lewisham with the result that St Modwen then decided that it was no longer in their commercial interest to develop the site and so they decided to sell it instead. Now it appears that the residents (of which I am one) will end up with something far worse. This is unacceptable in my view. In my view:- a) a 15 storey height will be an eyesore to the whole area and the number of houses proposed will drastically worsen the already bad traffic in the area which has recently become even more congested by the local road closures. I consider this 15 storey height totally unacceptable; b) This risks the same height development being built on the Sainsburys and BMW garage site which would also be unacceptable; c) I would like to see something far more in line with the previous St Modwen proposal i.e. an attractive mixed residential/retail site of limited height (no more than 6 storeys) with adequate parking. I have lived in Lee for 26 years and Leegate has been a complete embarrassment to the area for far too long. This is an opportunity to greatly improve the area and a 15 story development is NOT the way to achieve that.	This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
	3	LEA SA 03	I have very recently discovered there are new plans in the pipeline for Leegate. Whilst supporting a new development for this area I cannot agree with the proposals I have very recently read about. Having realised the deadline for submitting any views is in little over an hour I have decided that the email below submitted by another local resident says exactly the things that I want to say. So rather than	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			rewording it at such short notice I am copying and pasting it. Building height of 15 stories - no way! 630 homes - no way! There should be a limit of 6 stories on anything built on that site consistent with the current building. 630 homes is far too many for that tiny condensed area as density is already an issue. The Leegate intersection is already the worst around for miles and it could not accommodate additional traffic from residents of 630 homes. This is crazy. If even half of these houses are built, what new infrastructure will go into the area to accommodate this? The plan makes no mention of any of this so therefore cannot be approved until a full infrastructure assessment on traffic (do not say new residents won't be allowed cars!), what new schools will be built, how many more NHS surgeries will be added, what transport links will be added? Existing train lines are not good enough to accommodate the current population in normal times. In summary, a development of the size being envisioned does not belong in this area or the Lee Green intersection.	The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
	3	LEA SA 03	4. With regard to the Leegate centre, which is the development nearest to our house, I should like to make the following comments: pls avoid overly high buildings (I'd suggest not more than 5 storeys); I'm not convinced there is demand for a huge amount of retail space in that area so suggest you don't build a lot or at least keep the plan flexible in this regard. It would be lovely if you could develop a hub of independent shops but I appreciate that's challenging; please include some green space amenities integrating paths and cycle routes (this works well around the new Kidbrooke station development).	Noted. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The draft Local Plan proposals for Lee Gate district centre seek to ensure provision of a wide range of main town centre uses, along with a mix of business unit typologies. However, the plan cannot prescribe the nature of end users occupiers (for example, independents as suggested by the respondent). The site allocations for the district centre make provisions for the delivery of significant public realm improvements, including new publicly accessible open space.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA SA 03	I am shocked to learn that Lewisham Council might approve the plan proposed by Galliard Homes for Leegate. 15 story high blocks would create an ugly addition to the area. Lewisham had enough of these high rise buildings with no provisional planning for new schools and creation facilities for the people of Lewisham. The centre of Lewisham has become like a jungle of high rise buildings with no green spaces. I hope that this monstrous plan will be stopped.	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
Lee Forum	3	LEA SA 03	The Council's online session for the East Area 16 March confirmed that the previous approved application for Leegate sets the height levels at 11 storeys, as the Council	Noted. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

			is required to take account of that previous application approval. Given that Lee Green is clearly not included in figure 5.1 as an area appropriate for tall buildings and that 11 storeys was only granted to St Modwen based on the 1960's towers behind Leegate, which under the draft plan would be inadmissible as 'anomalous' to the area, we ask that site allocation 3 makes this 11 storey height a maximum in the Leegate site allocation description. The height at Leegate will act as a reference for heights at the other two site allocations at the Lee Green cross roads should they come forward for development in the future	The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	
Lee Forum	3	LEA SA 03 GR 04	The large canopy trees on north east corner which have TPOs are included in the Lee Forum's site allocation for Leegate but not the Plan's site 3 allocation. The loss of these large very old trees removes much needed breathing space and greenery at the site and the community strongly resisted their loss under the St Modwen's plans. They need to be included in the site allocation in the Plan as on p374/F states F Proposals involving the removal of protected trees (i.e. those covered by a Tree Protection Order and trees within Conservation Areas), or those that would have a detrimental impact on the health and visual amenity provided by protected trees, will be strongly resisted. The Council may identify and seek to protect trees that are of a significant amenity, heritage, ecological, or other value through the development management process. What is meant by 'will be strongly resisted'?	Noted. The approved application for Leegate has established the principal of removing the TPOs. However the assessment of any loss of trees in subsequent applications will be assessed through the Development Management process.	No change.
Lee Manor Society	3	LEA SA 03 Section 05	**Lee Green and other district centres.** The hope expressed is for these to 'retain their distinctive features,' and to be a 'focus for growth, renewal and sensitively managed change.' However, 'respecting local character and accommodating change should not be seen as mutually exclusive'. Leegate, the faded 1960s shopping centre that dominates the Lee Green crossroads, is due to be redeveloped by a new property owner, Galliard Homes. Lewisham planners and councillors failed to take community concerns into account when approving an earlier proposal for redevelopment (involving a large supermarket, very little public space and plentiful parking). We can only hope the sentiments expressed in this plan – which may not be in force when a revised planning application is made – will carry more weight. The plan does call (p91) for designs 'to understand the local and distinctive context of the site' and to include 'effective engagement with the local community.' LMS believes redevelopment should respect the proportions of the local area including 'the height, scale, mass and bulk both in the immediate vicinity and the surrounding area'. Additionally, we support 'building heights that are sensitive to the site's immediate and wider context' (p109).	Noted. This response seems to be relating to proposals currently being prepared by Galliards for the Leegate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. Planning applications will be considered against the extant development plan, having regard to any material weight afforded to emerging plans and the statutory stage they are at in the plan-making process.	No change.
Lewisham Cyclists	3	LEA SA 03 LEA SA 04	**Leegate Shopping Centre & Sainsbury's Lee Green;** In order for the Council to meet policy TR3 in the East area, Development requirements (16.26) should take into account plans for strategic cycle routes identified in the Council Transport Strategy running north-south along Burnt Ash Road as	Noted	Leegate Shopping Centre and Sainsbury's Lee Green site allocations amended by referencing the strategic cycle route along Burnt Ash Road

			integral to providing access to high quality public realm and adopting the Healthy Streets approach.		
Make Lee Green	3	LEA SA 03	We support the redevelopment of the Leegate centre in a way that enhances and serves the whole community. If commercial options are not viable, consideration should be given to turning the area back in to green space.	Noted. At the current stage in the plan process, the Council has engaged with the landowner and the site is considered to be deliverable within the plan period.	No change.
Royal Borough of Greenwich	3	LEA SA 03	Leegate Shopping Centre: We fully support the redevelopment of this site in a manner that enhances and reinforces the role of Lee Green district centre, including a range of town centre uses. While there are some existing tall and large buildings in the area, including a mid-century office block on the site itself, these generally detract from the character of the area, which is predominantly low-rise and Victorian. The allocation should include some direction on appropriate height and scale, emphasising that the site should be predominantly mid-rise and that any taller elements should be located towards the south to reduce their impact on the more historic parts of the town centre.	Noted. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The location of specific tall buildings on-site and the impact on the historic parts of the town centre will be considered as part of the Development Management process.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	3	LEA SA 04	Sainsbury's Site Why is this even mentioned for redevelopment? It is the only supermarket in the area and also the closest for the residents of Blackheath. It would be a waste of money to remove the supermarket and develop this land. Don't do it. I understand there is a shortage of affordable housing but as the pandemic has shown more people are now working from home and are likely to continue to do so therefore it is important that any new affordable housing should have outside green space. No new high rise blocks need to be built as there will be plenty of office blocks empty ready to convert into homes.	Noted. The London Plan directs that Local Plans seek opportunities to facilitate the redevelopment of single-storey retail developments in order to make a more optimal use of land. The site allocation SA04 provides for main town centre uses, which allow for the re-provision of a supermarket on site.	No change.
	3	LEA SA 04	SAINSBURYS SITE 6.We do not think this site should be considered for MAJOR redevelopment for housing or anything else. Do not encourage the developers. Closure of such a useful facility for residents would be a seriously retrograde step. Residents won't want to find themselves in the situation that , from an unnecessary proposal from St M. for a second superstore, we end up with none	Noted. The London Plan directs that Local Plans seek opportunities to facilitate the redevelopment of single-storey retail developments in order to make a more optimal use of land. The site allocation SA04 provides for main town centre uses, which allow for the re-provision of a supermarket on site.	No change.
	3	LEA SA 04	p657 - Sainsbury's I wholeheartedly disagree about doing anything with this site whatsoever. We have no local medium to large supermarket anywhere in Lee let alone Lee Green (and not in Hither Green or Blackheath high street either). If you took away this supermarket provision on the land and changed it to different purpose in the future the closest supermarket I'd have would be Lewisham Tesco's (on the 273 that is a long journey for someone without a car if you're trying to decrease car usage), Eltham? Bromley? or Catford? I don't even know where. During lockdown, Sainsburys was one of the few places I could go as a single person to get some human contact apart from my social bubble (who was on one of those harder to reach surrounded by flower pot roads). Please	Noted. The London Plan directs that Local Plans seek opportunities to facilitate the redevelopment of single-storey retail developments in order to make a more optimal use of land. The site allocation SA04 provides for main town centre uses, which allow for the re-provision of a supermarket on site.	No change.

			please don't change the use of this building. It and its amazing staff has got me through lockdown. The local area depends on it and seeing it with empty shelves and the effect on those less lucky in the area was utterly heartbreaking - this site needs to stay as a supermarket so local residents can access local supermarket without cars. The Coop is not enough by any means for this large an area.		
Lee Forum	3	LEA SA 04	Site 4 Sainsbury's Lee Green includes adding to the large canopy planting along Burnt Ash Road. As Burnt ash is a Lewisham owned road it is also possible to include this improvement on the Site 3 Leegate site as part of the declared intention to improve the public realm.	Agreed.	Leegate Shopping Centre site allocation amended be referencing tree planting along Burnt Ash Road
Lee Forum	3	LEA SA 04	We would like site 4 to have a maximum height limit of 10 storeys and site 5 to have a maximum height limit of 5 stories to reflect their local contexts.	Noted. The London Plan directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
Lee Forum	3	LEA SA 04	Improving the crossroads working with TFL is vital to changing the street scape. All efforts should be made to protect pedestrians from harmful pollutants and increase safety. All nearby bus stops should be set back to avoid the junction getting locked up and the turn into Sainsbury's refigured to avoid congestion.	Agreed. The Council will continue to work with TFL to secure street scape improvements as part of the Healthy Streets Approach.	Sainsbury's Lee Green site allocation amended by referencing a healthy streets corridor
Royal Borough of Greenwich	3	LEA SA 04	Sainsbury's Lee Green: Confusingly, the allocation recommends that taller elements be delivered away from the Grade II listed Police Station, but then encourages them in the northeast corner, which is adjacent to the police station. We would encourage any tall buildings to be directed to the southern part of the site, where they would have less impact on the historic part of the town centre.	The location of specific tall buildings on-site and the impact on the historic parts of the town centre will be considered as part of the Development Management process.	No change.
Lewisham Liberal Democrats	3	LEA SA 04	• Sites like the **Sainsbury's at Lee Green**, **Leegate** shopping centre and the **Aldi** in Catford could indeed be put to better use, by building upwards, creating large and small retail units, and additional housing. However, this involves demolishing existing buildings, and reducing substantially the number of parking spaces available. The clearly stated aim is to provide only a minimum amount of parking and new residential accommodation will not have parking associated with it. However, if Sainsbury's is rebuilt on the existing site and if there is another large shop such as Asda in the Leegate shopping centre, then these will attract customers coming by car, and this will have implications for parking and traffic in the area (see 5 above). Underground parking at Leegate should be seriously considered and no archaeological objections against it seem to exist.	Parking requirements for all future planning applications will be assessed against policy TR4 Parking.	No change

	3	LEA SA 05	Please ensure that the River Quaggy by the BMW site and along to the back of Weigall Road playing Fields is opened up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee	Noted. Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
	3	LEA SA 05	Please ensure that the River Quaggy by the BMW site and along to the back of Weigall Road playing Fields is opened up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee	Noted. Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
	3	LEA SA 05	We have the Quaggy River running through Lee and I would ask that access and regeneration of the riverside around the BMW garage site is included in the local plan	Noted. Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
	3	LEA SA 05	Please ensure that the River Quaggy by the BMW site and along to the back of Weigal Road playing Fields is opened up with access for all.	Noted. Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
	3	LEA SA 05	would like to see the River Quaggy by the BMW site and along to the back of Weigall Road playing Fields is opened up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee.	Noted. Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
	3	LEA SA 05	BMW Garage Site Again the Local Plan should state that any new buildings on this site will not be higher that 3 or 4 storeys to fit in with existing older buildings at the Lee Green Cross Roads which include the locally listed Old & New Tiger Heads and the Grade II listed fire station. Please ensure that the River Quaggy running on one side of the BMW site and along to the back of Weigall Road playing fields is opened up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening in the past with better flood control (Ladywell Fields, Sutcliffe Park and Manor Park). That work should continue and be of benefit now to the residents of Lee.	Noted. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the Council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
	3	LEA SA 05	Please ensure that the River Quaggy by the BMW site and along to the back of Weigall Road playing Fields is opened up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee.	Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
	3	LEA SA 05	The River Quaggy alongside the BMW site and the back of Weigall Road playing Fields is opened up with access for all as nature is very important for people's health. The work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee.	Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.

	3	LEA SA 05	The BMW site and along to the back of Weigall Road playing Fields should be opened up with access for all to The Quaggy – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee.	Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
	3	LEA SA 05	BMW DEALERSHIP SITE 7. No strong views about car dealerships, But it is surely not sensible to say that planning guidelines for this site as well as Sainsburys should be guided by the same principles as adopted for Leegate. If anything it should be the other way about - I. e. the more development on the Leegate site, the less the scale of the development on the others if the problems set out at points 2 and 3 above are not to become worse.	Noted. The draft Local Plan sets out clear site specific guidance on all site allocations.	No change.
	3	LEA SA 05	Please ensure that the River Quaggy by the BMW site and along to the back of Weigall Road playing Fields is opened up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee.	Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
	3	LEA SA 05	Please ensure that the River Quaggy by the BMW site and along to the back of Weigall Road playing Fields is opened up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Parks) and that work should continue and be of benefit now to the residents of Lee.	Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
	3	LEA SA 05	Please ensure that the River Quaggy by the BMW site and along to the back of Weigall Road playing Fields is opened up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee	Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
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	3	LEA SA 05	Please ensure that the River Quaggy by the BMW site and along to the back of Weigall Road playing Fields is opened up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe	Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy. .	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.

			and Manor Park) and that work should continue and be of benefit now to the residents of Lee		
	3	LEA SA 05	Please ensure that the River Quaggy by the BMW site and along to the back of Weigall Road playing Fields is opened up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee	Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
	3	LEA SA 05	I would like to see more care and imagination with planning, for example public access to the River Quaggy on the BMW site to make Lee Green a better and healthier place for all people to live in now and in the future, alongside appropriate development.	Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
	3	LEA SA 05	Please ensure that the River Quaggy by the BMW site and along to the back of Weigall Road playing Fields is opened up with access for all.	Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
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	3	LEA SA 05	Please will you also ensure that the River Quaggy by the BMW site and along to the back of Weigal Road playing Fields is opened up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee.	Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
Lee Forum	3	LEA SA 05	Site 5 Land at Lee High Road and Lee Road opening access to the River Quaggy is supported and supports the proposed new Quaggy Playing Fields park included on The Campaign for Rural England's Ten New Parks for London. We ask the council to require any development to enhance the river, its water quality and amenity for residents through access and additional riverbank greening.	Within draft Local Plan site allocation LEA SA05 a key requirement is improvements to enhance access to and visual amenity of the River Quaggy.	Land at Lee High Road and Lee Road site allocation amended, with enhanced access and amenity of the river moved from Guidelines to a Requirement.
Lewisham Cyclists	3	LEA SA 05	**Land at Lee High Road and Lee Road;** In order for the council to meet policy TR3 in the East area, Development requirements (16.34) should take into account plans for strategic cycle routes identified in the Council Transport Strategy running East West along A20 Lee High Road and north-south along Lee Road as integral to providing access to high quality public realm and adopting the Healthy Streets approach.	Agreed	Land at Lee High Road and Lee Road site allocation amended by referencing Healthy Streets corridor and the A20

Quaggy Waterway Action Group	3	LEA SA 05	**Land at Lee High Road and Lee Road** Pages 659-660 Site allocation 16.32 Mixed-use redevelopment of existing car dealers comprising compatible main town centre and residential uses. **Public realm enhancements including improved access to the River Quaggy.** Opportunities 16.33 This site is located within Lee Green district town centre. The western part of the site is occupied by a car dealers and its associated showroom parking. The eastern part of the site comprises a terrace of properties with a mix of residential and main town centre uses, including a public house, and is an integral feature of the townscape. The **River Quaggy runs along the back of the site**. Redevelopment and site intensification, along with the introduction of a wider range of uses, can provide a more optimal use of land to support the long-term vitality and viability of the town centre. **Redevelopment can also enable public realm enhancements, with improved access to the River Quaggy**. 16.34 Development requirements • Retention of the existing terrace of properties at the eastern part of the site, including the public house. • Postive ***(sic)*** frontages with active ground floor frontages within the Primary Shopping Area, including at Lee High Road. • Delivery of new and improved public realm, in accordance with a site-wide public realm strategy, including: **• Improvements to enhance access to and amenity value of the River Quaggy** • Along Lee High Road and Lee Road, improvements to the forecourt at the road junction 16.35 Development guidelines • The design of development should respond positively to the existing terrace at the eastern edge of the site. **• Development should be designed to enhance access to the River Quaggy which runs along the northern edge of the site, and to improve its ecological quality and amenity value.** **QWAG Comments:** Enhancing the amenity and ecological quality of the River Quaggy should be a requirement, not a guideline. There is considerable opportunity in this section to be imaginative with public access to an improved river and local amenity, including cross boundary connections.	Agreed	Land at Lee High Road and Lee Road site allocation amendedto include reference to improved ecological quality and amenity value, as suggested.
Royal Borough of Greenwich	3	LEA SA 05	Land at Lee High Road and Lee Road: While we support the redevelopment of this site and the introduction of town centre uses along the high road and improvements to the public realm, the allocation should include more guidance regarding design. The eastern part of the site includes a terrace of attractive 2-3 storey Victorian shops and it faces a similar terrace on the Greenwich side of the road. The redevelopment of the site should ensure that this small-	The Local Plan is a strategic policy document and the Council needs to carefully consider the level of detail provided for each area within the site allocations. Further detailed guidance at a masterplanning level would normally be undertaken as part of a Framework Document or Supplementary Planning Document (SPD).	No change.

			scale, Victorian character is retained and that any taller or larger buildings are located far enough to the west that they do not appear within the street scene along Lee Road.		
	3	LEA SA 06	Lee Station Local Centre This is one of the most successful Local Centres in Lewisham. The almost 100% continuous occupancy rate of shops is the main evidence of this success. The addition of a small Co-op supermarket five years ago has brought new vigour. The continued industrial employment use of the Citroen garage site as part of a larger Travis Perkins operation also shows the success here. The lack of development sites is a relief as residents see the effect of new housing around other rail stations in the Borough and beyond. The small industrial site in Southbrook Road is maintaining local employment opportunities and it would be a sad reversal if this was appropriated for housing just because its rail station proximity would give a premium profit for developers and a target tick-box for members and officers.	The site is considered an appropriate site for mixed use redevelopment and the site allocation provides for employment floorspace, in addition to residential, in order to maximise the potential of the site.	No change.
Lee Manor Society	3	LEA SA 06	The Plan proposes a redevelopment of **Southbrook Mews**, a small industrial/business site at the Burnt Ash Road end of Southbrook Road. The site includes a locally listed industrial building. The suggestion is for a mix of business and residential uses on the site with buildings rising in height to the railway line. We feel it is overambitious to include housing and it would be better for the site to continue to provide small business premises/workspaces. The age of the wall fronting Southbrook Road is not known to us, but we see no need for its removal. It provides security for businesses on the site. We also see no need for the creation of a pedestrian walkway from the south-east corner of the site to Burnt Ash Road and Lee station, as suggested by the plan.	The site is considered an appropriate site for mixed use redevelopment and the site allocation provides for employment floorspace, in addition to residential, in order to maximise the potential of the site. Disagree, a more positive frontage could be created with the demolition of the wall. Disagree about the pedestrian walkway as this will help to increase connectivity with the railway station.	No change.
	3	LEA SA 07	Early Opportunity for Site Allocation action? There is currently a Planning Application in to expand the site. Previously a Cricket Field and with the John Pound 1870s former Lee Public Halls and Steam Laundry Building still in situ. As the basic structure is still there, consideration should be given to incorporating it in the Development once the modern additions are removed. As the site is currently under review, CONNECTIVITY consideration should be given to creating a walking /cycling through route to the Industrial Estate avoiding the road and narrow pavements of Holme Lacey Road and past the John Pond Building. This is in line with Lewisham's healthy streets policy.	Noted. The site now has planning consent for a builders merchants and operational yard.	Travis Perkins and Citroen Garage site allocation has been removed from the Plan
Lee Manor Society	3	LEA SA 07	Proposals here would appear to prevent the redevelopment of the **Travis Perkins/former Citroen car showroom** site as currently proposed by Travis Perkins. If the street frontage is to be made more welcoming and the building line of the Holme Lacey Road houses to be preserved Travis Perkins should not be allowed erect the large shed at the proposed location. We welcome this approach if it leads to streetscape on both Burnt Ash Hill and Holme Lacey Road that better reflects the residential and shopping character of the area. (p663).	Noted. The site now has planning consent for a builders merchants and operational yard.	Travis Perkins and Citroen Garage site allocation has been removed from the Plan

	3	LEA SA 08	P666 - the local Mayfields Hostel I have no issue with the local hostel being close to where I live on my road and often see the residents being taken for walks by their caring and professional staff. I'm not sure about the change of the use of this building at all. This seems to remove the ability of the building to home mentally ill vulnerable people and instead creating flats and a gallery. A) That sounds pretty horrible to me and upsetting for mentally ill residents having to move because Lewisham want to redevelop the area. B) This is a local plan, and I can only assume locally mentally ill people live there. I can't agree that this is a new 'optimal use of the land' or the creation of 'high quality housing' if this relocates (locally) vulnerable people. Lewisham is for everyone, not for the sole purpose of gentrification, but as a local area that should be inclusive to those with challenges as much as those without. And as I also couldn't be more local to this hostel, I wholeheartedly disagree with relocating it so the area can benefit from 'optimisation'. If this land is being used to support the vulnerable, it is already being used optimally. I would prefer it as a residential hostel supporting the community to the increased footfall from an unneeded museum, gallery or crèche on a residential road, or a building site and new-build flats on a road with predominantly older beautiful houses, it seems out of touch with the residential nature of the road.	The site is considered an appropriate site for residential redevelopment.	No change.
Lewisham Liberal Democrats	3	LEA SA 08	**Mayfields Hostel** (https://lewisham.gov.uk/organizations/mayfield). Although planning permission has already been granted for 47 residential units (DC/17/103886), it seems that the scheme is now to be 'redesigned to allow for more efficient use of the site'. Will the new plans respect the nature of the surrounding area and not go above the five-six-storey height limit? Will all the trees be retained? Will a financial contribution be made to fund the extra social services required? The limited parking proposed is unrealistic.	The residential capacity of the site allocation remains the same as the consented scheme – 47 gross / 21 net units. Optimal capacity for the site and the scale and nature of development will be established at planning application stage through a design led approach. The site allocation already emphasises to the retention of existing mature trees and trees of value. Parking requirements for all future planning applications will be assessed against policy TR4 Parking.	No change.
Grove Park Neighbourhood Forum	3	LEA SA 09	Under 16.51, Development Requirements, the policy must more explicitly state that the town centre should be 'green infrastructure-led' to provide a greener public realm that connects the proposed new district park with Chinbrook Meadows and beyond.	Agree.	Sainsbury Local and West of Grove Park Station site allocation amended to provide further clarity on links to existing green infrastructure.
Grove Park Neighbourhood Forum	3	LEA SA 09	Development requirements should be numbered, so that they are easier to refer to, rather than bullet points.	Agree that bullet points are not easy to refer to.	Bullets points in all site allocations changed to numbers for ease of future referencing
Lewisham Cyclists	3	LEA SA 09	**Sainsbury Local and West of Grove Park Station;** In order for the council to meet policy TR3 in the East area, Development requirements (16.51) should take into account plans for strategic cycle routes identified in the Council Transport Strategy running north-south along Baring Road as integral to providing access to high quality public realm and adopting the Healthy Streets approach.	Agree.	Sainsbury Local and West of Grove Park Station site allocation amended to reference Healthy Streets corridor and cycle route

	3	LNA	Please record my comments in response to the consultation on Lewisham's Local Plan: Canal Approach I request that Lewisham Council prioritise reopening Canal Approach towpath, part of Deptford Parks Liveable Neighbourhood as a key strategic route for North Deptford. Play & School Routes Play does not feature as a priority North Deptford. Covid-19 has meant children in this high-density area have had little access to high quality play. Existing playgrounds are of low quality. The playground promised in 2014 alongside the £300k+ skatepark has not materialised. This should be delivered and other playgrounds across the area updates alongside safer streets and school routes. Prioritise a huge investment in playgrounds and safer streets for children. Polluting Industry Reduce the number of trucks coming to the area by changing the use class of industrial and waste processing sites like scrapyards and private waste processing. Support low pollution industries that create jobs for local people in healthy environments. SELCHP SELCHP is proposed as an integral part of the Local Plan. Waste incinerators are usually located in the most deprived neighbourhoods this is socially unjust. Furthermore, by 2035, incineration will be a more carbon-intensive process than even landfill. Remove SELCHP as a priority and shut it down so the borough can meet its climate emergency targets. New Riverside Park The population will grow dramatically due to 10k homes in the Evelyn Ward plus another 7k homes at Millwall and Canada Water. There is no plan to increase green space despite council documents stating the need to do so. Make delivering a new riverside park for Deptford on the protected wharf at Convoys Wharf a priority.	Canal Approach – The Local Plan identifies this as a key strategic route for North Deptford highlighted in fig 15.2 and underpinned by the North Lewisham Links policy. The Council have been working with local groups as part of the Liveable Neighbourhoods Project to progress the scheme. Due to the financial challenges that TFL find themselves as a result of COVID-19 the project is having to be scaled back in terms of the scope. The details of which are currently being discussed Play & School Routes - The Local Plan is underpinned by the Council's Parks and Open Spaces Strategy 2020-2025 which outlines the key priorities for improvements including many within the Deptford area. Lewisham Council has announced the revamp the play equipment in four popular Deptford parks. Evelyn Green, Sayes Court, Deptford Park and Folkestone Gardens will all benefit from refurbishments which are due to take place in the coming months. Polluting Industry – There are a number of areas in the north that are designated Strategic Industrial Land which are protected by the London Plan. It is therefore difficult for planning to limit the industrial uses on these sites however wherever possible we will try and ensure that these industries move away from heavy industrial uses such as scrapyards etc. to more low pollution industries. SELCHP - The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. For the time being, the Local Plan must therefore continue to safeguard the site for waste management uses. New Riverside Park – The provision of new open space is identified within the draft Local Plan site allocations including new open spaces at Convoys Wharf. The Local Plan recognises that as an urban borough accommodating significant growth it is unfeasible to deliver large areas of new open space and instead the focus will be on improvements to the existing provision.	No change.
	3	LNA	Please record my comments in response to the consultation on Lewisham's Local Plan: - Polluting Industry	Polluting Industry – There are a number of areas in the north that are designated Strategic Industrial Land which are protected by the London Plan. It is therefore difficult for planning to limit the industrial uses on these sites however wherever possible we will try and ensure that these industries move away	No change.

			Please reduce the number of trucks coming to the area by changing the use class of industrial and waste processing sites like scrapyards and private waste processing. Support low pollution industries that create jobs for local people in healthy environments. SELCHP SELCHP is proposed as an integral part of the Local Plan. Waste incinerators are usually located in the most deprived neighbourhoods this is socially unjust. Furthermore, by 2035, incineration will be a more carbon-intensive process than even landfill. Remove SELCHP as a priority and shut it down so the borough can meet its climate emergency targets. New Riverside Park The population will grow dramatically due to 10k homes in the Evelyn Ward plus another 7k homes at Millwall and Canada Water. There is no plan to increase green space despite council documents stating the need to do so. Make delivering a new riverside park for Deptford on the protected wharf at Convoys Wharf a priority.	from heavy industrial uses such as scrapyards etc. to more low pollution industries. SELCHP - The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. For the time being, the Local Plan must therefore continue to safeguard the site for waste management uses.	
	3	LNA	Canal Approach I request that Lewisham Council prioritise reopening Canal Approach towpath, part of Deptford Parks Liveable Neighbourhood as a key strategic route for North Deptford. Play & School Routes Play does not feature as a priority North Deptford. Covid-19 has meant children in this high-density area have had little access to high quality play. Existing playgrounds are of low quality. The playground promised in 2014 alongside the £300k+ skatepark has not materialised. This should be delivered and other playgrounds across the area updates alongside safer streets and school routes. Prioritise a huge investment in playgrounds and safer streets for children. Polluting Industry Reduce the number of trucks coming to the area by changing the use class of industrial and waste processing sites like scrapyards and private waste processing. Support low pollution industries that create jobs for local people in healthy environments. SELCHP SELCHP is proposed as an integral part of the Local Plan. Waste incinerators are usually located in the most deprived neighbourhoods this is socially unjust. Furthermore, by 2035, incineration will be a more carbon-intensive process than even landfill. Remove SELCHP as a priority and shut it down so the borough can meet its climate emergency targets. New Riverside Park	Canal Approach – The Local Plan identifies this as a key strategic route for North Deptford highlighted in fig 15.2 and underpinned by the North Lewisham Links policy. The Council have been working with local groups as part of the Liveable Neighbourhoods Project to progress the scheme. Due to the financial challenges that TFL find themselves as a result of COVID-19 the project is having to be scaled back in terms of the scope. The details of which are currently being discussed Play & School Routes - The Local Plan is underpinned by the Council's Parks and Open Spaces Strategy 2020-2025 which outlines the key priorities for improvements including many within the Deptford area. Lewisham Council has announced the revamp the play equipment in four popular Deptford parks. Evelyn Green, Sayes Court, Deptford Park and Folkestone Gardens will all benefit from refurbishments which are due to take place in the coming months. Polluting Industry – There are a number of areas in the north that are designated Strategic Industrial Land which are protected by the London Plan. It is therefore difficult for planning to limit the industrial uses on these sites however wherever possible we will try and ensure that these industries move away from heavy industrial uses such as scrapyards etc. to more low pollution industries. SELCHP - The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan,	No change.

			The population will grow dramatically due to 10k homes in the Evelyn Ward plus another 7k homes at Millwall and Canada Water. There is no plan to increase green space despite council documents stating the need to do so. Make delivering a new riverside park for Deptford on the protected wharf at Convoys Wharf a priority.	identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. For the time being, the Local Plan must therefore continue to safeguard the site for waste management uses. New Riverside Park – The provision of new open space is identified within the draft Local Plan site allocations including new open spaces at Convoys Wharf. The Local Plan recognises that as an urban borough accommodating significant growth it is unfeasible to deliver large areas of new open space and instead the focus will be on improvements to the existing provision.	
	3	LNA	"DNA should emphasize its "refurbish first" policy, to preserve built environment of various periods - especially 20th century that may not be listed. Deptford is very low on designated listed and protected areas, compared to other parts of the Lewisham borough. Yet it has the widest range of historical periods in the borough - detailed in the Characterization Report by Aecom commissioned by DNA. Evelyn Street 'local centre'. Historically Evelyn Street had many more shops than it presently has. Other 'feed' in streets can be encouraged, too, to have local shops and workshops once again. To encourage "Keep in Local" in leisure and work	Whilst the Council will always encourage developers to look at refurbishment options where possible this is not always feasible and not always the best use of land. Information on nominations for locally listed buildings can be found on the councils website	No change.
	3	LNA	Please record my comments in response to the consultation on Lewisham's Local Plan: Canal Approach I request that Lewisham Council prioritise reopening Canal Approach towpath, part of Deptford Parks Liveable Neighbourhood as a key strategic route for North Deptford. Play & School Routes Play does not feature as a priority North Deptford. Covid-19 has meant children in this high-density area have had little access to high quality play. Existing playgrounds are of low quality. The playground promised in 2014 alongside the £300k+ skatepark has not materialised. This should be delivered and other playgrounds across the area updates alongside safer streets and school routes. Prioritise a huge investment in playgrounds and safer streets for children. Polluting Industry Reduce the number of trucks coming to the area by changing the use class of industrial and waste processing sites like scrapyards and private waste processing. Support low pollution industries that create jobs for local people in healthy environments.	Canal Approach – The Local Plan identifies this as a key strategic route for North Deptford highlighted in fig 15.2 and underpinned by the North Lewisham Links policy. The Council have been working with local groups as part of the Liveable Neighbourhoods Project to progress the scheme. Due to the financial challenges that TFL find themselves as a result of COVID-19 the project is having to be scaled back in terms of the scope. The details of which are currently being discussed Play & School Routes - The Local Plan is underpinned by the Council's Parks and Open Spaces Strategy 2020-2025 which outlines the key priorities for improvements including many within the Deptford area. Lewisham Council has announced the revamp the play equipment in four popular Deptford parks. Evelyn Green, Sayes Court, Deptford Park and Folkestone Gardens will all benefit from refurbishments which are due to take place in the coming months. Polluting Industry – There are a number of areas in the north that are designated Strategic Industrial Land which are protected by the London Plan. It is	No change.

			SELCHP SELCHP is proposed as an integral part of the Local Plan. Waste incinerators are usually located in the most deprived neighbourhoods this is socially unjust. Furthermore, by 2035, incineration will be a more carbon-intensive process than even landfill. Remove SELCHP as a priority and shut it down so the borough can meet its climate emergency targets. New Riverside Park The population will grow dramatically due to 10k homes in the Evelyn Ward plus another 7k homes at Millwall and Canada Water. There is no plan to increase green space despite council documents stating the need to do so. Make delivering a new riverside park for Deptford on the protected wharf at Convoys Wharf a priority. We also need more healthy neighbourhood road closures. Roads such as Payne Street and Idonia Street which are densely residential and used as a rat run for all kinds of vehicles including HGV'S. These roads are backed up during rush hour and have speeding cars at other times. I trust these issues will be given the attention they deserve.	therefore difficult for planning to limit the industrial uses on these sites however wherever possible we will try and ensure that these industries move away from heavy industrial uses such as scrapyards etc. to more low pollution industries. SELCHP - The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. For the time being, the Local Plan must therefore continue to safeguard the site for waste management uses. New Riverside Park – The provision of new open space is identified within the draft Local Plan site allocations including new open spaces at Convoys Wharf. The Local Plan recognises that as an urban borough accommodating significant growth it is unfeasible to deliver large areas of new open space and instead the focus will be on improvements to the existing provision.	
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	3	LNA	We are on the Boundary with Greenwich Borough and therefore greatly affected by what happens there. There is such disparity between Lewisham and Greenwich. We are also affected by TFL's actions. It is apparent that there is little cohesive thought about impacts of the separate actions by any of these bodies. At times, it feels as though we are the forgotten part of Lewisham. We have lived in our current accommodation for 45 years! You would think that we had a voice but no; constantly told what is best for us, like naughty children. I have walked and run the Borough, cycled for a long time to and from work. This was because train and bus were unhealthy crowded nightmares, (no change there)! I learnt roadcraft cycling, sadly lacking in today's new 'cyclists '. You have to take precautions, ensure that your bicycle has bell, working lights and you can be seen in the dark. The concept of Walking and Cycling requires personal responsibility and consideration as much as vehicles. If someone wants to race, do it at a Velodrome or Race Track.	Our approach to encourage sustainable modes of transport including walking, cycling and public transport are outlined in Policy TR3 Healthy streets as part of healthy neighbourhoods.	No change.

			This leads me to the point that if you have a Cyclist's Charter in the Local Plan, you also need a Pedestrian one. The first mode of transport is walking and yet our pavements are in need of repair, they are obstacle courses. Signage is out of control. It is often in the wrong place. The recently installed cameras and signs restrict the pavement space even more. The plethora of signage and street furniture ranges from cabling cabinets, phone masts, CPZ posts, bollards, planters, bus shelters, five types of refuse collection bins, (including commercial bins) Estate Agent Signs protruding at head height over pavements. Add the indiscriminate dumping and vehicle parking, including 'allowable CPZs'and a Pedestrian's lot is not a happy one. This is even worse for someone with impaired sight or difficulty walking! Yet we are told this a Healthy Neighbourhood?		
	3	LNA	The Positive The main positive from the LLP is the central preservation of the Bakerloo Line Extension as it's central premise and the safeguards the area currently owned by Sainsbury's for the construction and excavation of the tunnels.	Noted	No change.
	3	LNA	The Negatives, Density – Housing over Quality and a lack of structural Environmental Concerns Delivery of the Bakerloo Line the New Cross appears include a mass housing project on top of the planned station. The LLP appears to be obsessed with an exaggerated residential development that is justified by the arrival of the BLE. There is much less emphasis retail or business opportunities. More over there is also an absence of green or public space, which is mentioned on the LLP but contradicted by the proposal to home vast number people on top of the Bakerloo Line Extension. The site cannot satisfy all needs. It cannot be a transport hub, mass housing project, retail estate and urban meeting place. Planners have to be realistic in what the site can be used for.	The site allocations in New Cross have been informed by the New Cross Area Framework which was extensively consulted on and endorsed by M&C. The indicative capacities for these site allocations reflect the areas central location within a district centre with excellent access to public transport and services.	No change.
	3	LNA	Pollution and Air Quality New Cross Road has the worst pollution London. Plans in the LLP to improve the air quality directly contradict the expansion of residential properties in the area by more than 6000 residential units that will bring their carbon footprint in extended vehicle use, services and domestic energy use. The plan cannot claim Green credentials whilst contradicting itself in its methods and aspirations for the area. SELCHP air quality and residential proximity South East London Combined Heat and Power (SEPCHP) is a processing plant for rubbish servicing much of the South East. In reality the SELCHP is an incinerator pumping toxic gasses and particulates into the air of New Cross Gate. In the Hatcham Society's response the LLP it states:	Canal Approach – The Local Plan identifies this as a key strategic route for North Deptford highlighted in fig 15.2 and underpinned by the North Lewisham Links policy. The Council have been working with local groups as part of the Liveable Neighbourhoods Project to progress the scheme. Due to the financial challenges that TFL find themselves as a result of COVID-19 the project is having to be scaled back in terms of the scope. The details of which are currently being discussed Play & School Routes - The Local Plan is underpinned by the Council's Parks and Open Spaces Strategy 2020-2025 which outlines the key priorities for improvements including many within the Deptford area. Lewisham Council has announced the revamp the play equipment in four popular Deptford parks. Evelyn Green, Sayes Court, Deptford Park and Folkestone Gardens will all benefit from	No change.

			"the latest figures released by the government's Environment Agency for 2019, that SELCHP reported a release of 361,665,000 kg of Carbon Dioxide and 144,818,000 kg of Carbon Dioxide from Qualifying Renewable Fuel Sources. Meanwhile, there was 566, 632 kg of Nitrogen Oxides released last year. Nitrogen Oxides include Nitrogen Dioxide, a harmful gas which damages lungs. " It goes on to say that : "The amount of Carbon Dioxide released from SELCHP was 3.3 times more than what was released from the Edmonton Solid Waste Incinerator in 2019 and SELCHP released 2.5 times more Nitrous Oxides than the Edmonton Solid Waste Incinerator. We also do not know the amount of Carbon Dioxide released through the burning of 'biogenic Co2' - food waste - as highlighted in Channel Four's Dirty Truth About Your Rubbish: Dispatches (March 2021). A report titled 'Health Effects due to Emissions from Energy from Waste Plant in London' created for the GLA published in May 2020 found that SELCHP had the highest NOx emission rate out of London's incinerator plants. " I support the advances in rubbish recycling over the last few years however the role of SEPCHP and its relationship with the Lewisham Local Plan need to be re examined and should not, as is stated in the LLP, be safeguarded. A full enquiry should be initiated into the role of SELCHP in our community and a clear and accessible publication of all data relating to processing waste. This has to include: Any breaching of toxin levels emitted by the plant Efficiency in terms of the quantity of material that is processed there A clear indication of the weekly source of the material being processed An inability to clarify SELCHP's role in polluting the air in New Cross and the surrounding area frankly makes a mockery of any green aspirations asserted in the LLP. I cannot see how homes can be built in such close proximity to the incinerating plant. Lewisham in their North area Plan looks to "safeguard strategic waste management sites including SELCHP" while promoting the redevelopment of Millwall Football stadium adjacent to SELCHP with 2,500 new homes planned. This means that home building is ear marked by the LLP in close proximity to a known emitter of toxic gasses and hazardous particulates.	refurbishments which are due to take place in the coming months. Polluting Industry – There are a number of areas in the north that are designated Strategic Industrial Land which are protected by the London Plan. It is therefore difficult for planning to limit the industrial uses on these sites however wherever possible we will try and ensure that these industries move away from heavy industrial uses such as scrapyards etc. to more low pollution industries. SELCHP - The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. For the time being, the Local Plan must therefore continue to safeguard the site for waste management uses. New Riverside Park – The provision of new open space is identified within the draft Local Plan site allocations including new open spaces at Convoys Wharf. The Local Plan recognises that as an urban borough accommodating significant growth it is unfeasible to deliver large areas of new open space and instead the focus will be on improvements to the existing provision.	
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	3	LNA	**a. Additional Strategic Site Allocation | Deptford Station North Access/Egress** DNA supports an access and egress on the northern site of Deptford Station. This would improve and shorten routes to and from the station from the north where much of the growth of population and employment will take place, adding capacity by distributing people at peak times and connect with the London Quietway route Q1. This may also support Evelyn Local Centre.	At this stage we are not reviewing additional site allocations. However this could form part of the next Local Plan review	No change.
	3	LNA	"DNA should emphasize its "refurbish first" policy, to preserve built environment of various periods - especially 20th century that may not be listed. Deptford is very low on designated listed and protected areas, compared to other parts of the Lewisham borough. Yet it has the widest range of historical periods in the borough - detailed in the Characterization Report by Aecom commissioned by DNA. Site 3: The Riverside Youth Centre building is an "iconic" building of the 20th century on Pepys estate and should be refurbished first. Note: I think that this site allocation may be withdrawn, altogether. From what I heard.	Whilst the Council will always encourage developers to look at refurbishment options where possible this is not always feasible and not always the best use of land. Information on nominations for locally listed buildings can be found on the councils website The plans policy on affordable housing is clearly stated and underpinned by our evidence base. 60 – 80% socially rented will simply be unviable and therefore the plan would not conform to the National Planning Policy Framework.	No change.

			Site 12: A new covered market area, all-weather, as a high quality and aesthetically beautiful feature in the area to attract existing and new footfall. To assist in keeping Deptford High Street a viable shopping experience in the later 21st century, after the redevelopment of Convoys Wharf. New housing redevelopment needs to be at least 60% to 80% socially rented at Council levels and secured tenancies. At 100% on Council owned land. Refer to DNA housing policies. Evelyn Street 'local centre'. Historically Evelyn Street had many more shops than it presently has. Other 'feed' in streets can be encouraged, too, to have local shops and workshops once again. To encourage "Keep in Local" in leisure and work.		
	3	LNA	RE: Lewisham Local Plan Please record my comments in response to the consultation on Lewisham's Local Plan: Canal Approach I request that Lewisham Council prioritise reopening Canal Approach towpath, part of Deptford Parks Liveable Neighbourhood as a key strategic route for North Deptford.	Canal Approach – The Local Plan identifies this as a key strategic route for North Deptford highlighted in fig 15.2 and underpinned by the North Lewisham Links policy. The Council have been working with local groups as part of the Liveable Neighbourhoods Project to progress the scheme. Due to the financial challenges that TFL find themselves as a result of COVID-19 the project is having to be scaled back in terms of the scope. The details of which are currently being discussed	No change.
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The St John's Society	3	LNA Vision Spatial Objectives	LEWISHAM'S NEIGHBOURHOODS AND PLACES: 15 LEWISHAM'S NORTH AREA St. John's, Brookmill Road or Somerset Gardens are not mentioned as heritage assets, nor in the overall 'Vision' or 'Spatial Objectives' for the North Area.	We are unable to mention all heritage assets in the plan but the council has a comprehensive list on our GIS system and on our website. Designated and Non-designated Heritage Assets also have separate policies in the Section 2 of the draft Local Plan	No change.

			Welcome the support for 'active uses' at street level. St. John's railway station suffers from poor accessibility.		
	3 3	LNA LNA SA 01	New Riverside Park The population will grow dramatically due to 10k homes in the Evelyn Ward plus another 7k homes at Millwall and Canada Water. There is no plan to increase green space despite council documents stating the need to do so. Make delivering a new riverside park for Deptford on the protected wharf at Convoys Wharf a priority.	New Riverside Park – The provision of new open space is identified within the draft Local Plan site allocations including new open spaces at Convoys Wharf. The Local Plan recognises that as an urban borough accommodating significant growth it is unfeasible to deliver large areas of new open space and instead the focus will be on improvements to the existing provision. The existing protected Wharf is protected at the London Plan level.	No change
	3	LNA	RE: Lewisham Local Plan Please record my comments in response to the consultation on Lewisham's Local Plan: Canal Approach I request that Lewisham Council prioritise reopening Canal Approach towpath, part of Deptford Parks Liveable Neighbourhood as a key strategic route for North Deptford, and make it safe for cyclists, scooters and skaters.	Canal Approach – The Local Plan identifies this as a key strategic route for North Deptford highlighted in fig 15.2 and underpinned by the North Lewisham Links policy. The Council have been working with local groups as part of the Liveable Neighbourhoods Project to progress the scheme. Due to the financial challenges that TFL find themselves as a result of COVID-19 the project is having to be scaled back in terms of the scope. The details of which are currently being discussed	No change
	3	LNA	Play & School Routes Play does not feature as a priority North Deptford. Covid-19 has meant children in this high-density area have had little access to high quality play. Existing playgrounds are of low quality, particularly the one in Sayes Court, which has been in steady decline and play equipment removed without replacement. The playground promised in 2014 alongside the £300k+ skatepark has not materialised. This should be delivered and other playgrounds across the area updates alongside safer streets and school routes. Prioritise a huge investment in playgrounds and safer streets for children.	Play & School Routes - The Local Plan is underpinned by the Council's Parks and Open Spaces Strategy 2020-2025 which outlines the key priorities for improvements including many within the Deptford area. Lewisham Council has announced the revamp the play equipment in four popular Deptford parks. Evelyn Green, Sayes Court, Deptford Park and Folkestone Gardens will all benefit from refurbishments which are due to take place in the coming months.	No change.
	3	LNA	Polluting Industry Reduce the number of trucks coming to the area by changing the use class of industrial and waste processing sites like scrapyards and private waste processing. Support low pollution industries that create jobs for local people in healthy environments.	Polluting Industry – There are a number of areas in the north that are designated Strategic Industrial Land which are protected by the London Plan. It is therefore difficult for planning to limit the industrial uses on these sites however wherever possible we will try and ensure that these industries move away from heavy industrial uses such as scrapyards etc. to more low pollution industries.	No change.
	3	LNA	Additionally we need additional cycle lockers for area cyclists to store their bikes safely as more people take up cycling, and place charging points for electric vehicles in sensible places, not double yellow lines or in front of kerb drops!	Please refer to policies on cycle parking and electric charging points.	No change.
	3	LNA	SELCHP SELCHP is proposed as an integral part of the Local Plan. Waste incinerators are usually located in the most deprived neighbourhoods this is socially unjust. Furthermore, by 2035, incineration will be a more carbon-intensive process than even landfill. Remove SELCHP as a	SELCHP - The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste.	No change.

			priority and shut it down so the borough can meet its climate emergency targets.	SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. For the time being, the Local Plan must therefore continue to safeguard the site for waste management uses.	
	3 3	LNA LNA SA 01	New Riverside Park The population will grow dramatically due to 10k homes in the Evelyn Ward plus another 7k homes at Millwall and Canada Water. There is no plan to increase green space despite council documents stating the need to do so. Make delivering a new riverside park for Deptford on the protected wharf at Convoys Wharf a priority.	New Riverside Park – The provision of new open space is identified within the draft Local Plan site allocations including new open spaces at Convoys Wharf. The Local Plan recognises that as an urban borough accommodating significant growth it is unfeasible to deliver large areas of new open space and instead the focus will be on improvements to the existing provision. The existing protected Wharf is protected at the London Plan level.	No change.
	3 3	LNA LNA SA 01	RE: Lewisham Local Plan In response to the consultation on Lewisham's Local Plan: Priority should be given to quality pedestrian / cycle public realm across the river front of the convoy wharf development. This closed off area is a real blight in the P / C route, forcing an awkward, uneven route around it.	The existing approved planning application does include a quality pedestrian and cycle route across the river front.	No change.
	3	LNA	Play & School Routes Play does not feature as a priority North Deptford. Covid-19 has meant children in this high-density area have had little access to high quality play. Existing playgrounds are of low quality. The playground promised in 2014 alongside the £300k+ skatepark has not materialised. This should be delivered and other playgrounds across the area updates alongside safer streets and school routes. Prioritise a huge investment in playgrounds and safer streets.	Play & School Routes - The Local Plan is underpinned by the Council's Parks and Open Spaces Strategy 2020-2025 which outlines the key priorities for improvements including many within the Deptford area. Lewisham Council has announced the revamp the play equipment in four popular Deptford parks. Evelyn Green, Sayes Court, Deptford Park and Folkestone Gardens will all benefit from refurbishments which are due to take place in the coming months.	No change.
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	3	LNA	Albeit, outside the realm of this plan, there should be a real push for Lewisham to encourage a sustainable river crossing. (Like the cycle/pedestrian bridge from Greenland Dock to Canary Wharf) the massive population growth in Evelyn ward especially, needs addressing. Canada Water / Surrey Quays is not enough. It is frustrating that the two tunnels that attract much traffic and associated pollution are either side of Lewisham. A bridge in between would be a great help and have huge benefits for the poorest ward, often dumped on in comparison to many other areas.	Noted. This is outside the scope of the Local Plan however we will pass your comments on to our Transport team.	No change.
	3	LNA	RE: Lewisham Local Plan Please record my comments in response to the consultation on Lewisham's Local Plan:	Canal Approach – The Local Plan identifies this as a key strategic route for North Deptford highlighted in fig 15.2 and underpinned by the North Lewisham	No change.

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	3	LNA	SELCHP SELCHP is proposed as an integral part of the Local Plan. Waste incinerators are usually located in the most deprived neighbourhoods this is socially unjust. SELCHP and other industry cuts across a busy school walking route and cycle quietway. Traffic caused by SELCHP etc. is a huge problem and the area around it is an accident blackspot due to waste trucks from across London. Lives will be lost without a strategy to reduce heavy traffic associated with waste burning and scrap recycling. Furthermore, by 2035, incineration will be a more carbon-intensive process than even landfill. Remove SELCHP as a priority and shut it down so the borough can meet its climate emergency targets.	SELCHP - The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. For the time being, the Local Plan must therefore continue to safeguard the site for waste management uses.	No change
	3 3	LNA LNA SA 01	New Riverside Park The population will grow dramatically due to 10k homes in the Evelyn Ward plus another 7k homes at Millwall and Canada Water. There is no plan to increase green space despite council documents stating the need to do so. Make delivering a new riverside park for Deptford on the protected wharf at Convoys Wharf a priority. This will bring revenue jobs and hope to a deprived community. Imperative!	New Riverside Park – The provision of new open space is identified within the draft Local Plan site allocations including new open spaces at Convoys Wharf. The Local Plan recognises that as an urban borough accommodating significant growth it is unfeasible to deliver large areas of new open space and instead the focus will be on improvements to the existing provision. The existing protected Wharf is protected at the London Plan level.	No change
	3	LNA	In addition conserve local Victorian homes by making the area around Deptford park a conservation area. Stop the spread of houses of multiple occupation in this area as they proliferate rubbish and lack of care. Plant trees along these streets and stop neglecting SE8!!!	The nomination of conservation areas is not part of the Local Plan remit. Please see the Council website.	No change

				The Council is in the process of making an Article 4 Direction to withdraw permitted development rights from Residential to HMOs.	
	3	LNA	RE: Lewisham Local Plan Please record my comments in response to the consultation on Lewisham's Local Plan: Canal Approach I request that Lewisham Council prioritise reopening Canal Approach towpath, part of Deptford Parks Liveable Neighbourhood as a key strategic route for North Deptford.	Canal Approach – The Local Plan identifies this as a key strategic route for North Deptford highlighted in fig 15.2 and underpinned by the North Lewisham Links policy. The Council have been working with local groups as part of the Liveable Neighbourhoods Project to progress the scheme. Due to the financial challenges that TFL find themselves as a result of COVID-19 the project is having to be scaled back in terms of the scope. The details of which are currently being discussed.	No change
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			Canal Approach Lewisham Council prioritise reopening Canal Approach towpath, as a key strategic route for North Deptford and for much of South East London.	Links policy. The Council have been working with local groups as part of the Liveable Neighbourhoods Project to progress the scheme. Due to the financial challenges that TFL find themselves as a result of COVID-19 the project is having to be scaled back in terms of the scope. The details of which are currently being discussed.	
	3	LNA	SELCHP SELCHP is proposed as an integral part of the Local Plan. It should not be part of the plan: it should rather be closed as soon as possible as under the Paris Climate Agreement of 2015 such facilities are contributing significantly to the UK's carbon emissions.	SELCHP - The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. For the time being, the Local Plan must therefore continue to safeguard the site for waste management uses.	No change.
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	3	LNA	Protect Victorian Houses around Deptford Park, Trundleys Road , Alloa Road stop giving permitted development to converting them into flats as 1000 of flats are being built but no family terraced houses protect this heritage.	The Council is currently preparing an Article 4 Direction to withdraw permitted development rights for conversions of family housing into HMOs. No change.	No change
	3	LNA	Remove speed bumps from Trundleys road and replace with 20 MPH speed camera make the road safer and make some money too.	To detailed for the Local Plan we will pass your comments on to the Council's Transport team	No change
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	3	LNA	RE: Lewisham Local Plan Please record my comments in response to the consultation on Lewisham's Local Plan: Can you please send to all people who might be affected by this new plan to have a proper consultation and receive in their letter box official communication of this master plan, how can people be informed about it if you do not send communication? I request for the consultation to be postponed so that people can be properly informed and therefore they will be in a better position to respond.	The consultation was undertaken in accordance with our Statement of Community Involvement.	No change.
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	3	LNA	SELCHP SELCHP is proposed as an integral part of the Local Plan. We have been having issues years after year with the smell of the local waste transport and now we are seeing our trees dying. The activity of SELCHP is 24/7 and they are burning medical waste, people are living closeby, this is not acceptable. I would like to ask for this Waste incinerator to be moved to a more appropriate location, particularly as there will be more people in the area. Furthermore, by 2035, incineration will be a more carbon-intensive process than even landfill. Can you please Remove SELCHP as a priority and move it somewhere else so the borough can meet its climate emergency targets.	SELCHP - The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. For the time being, the Local Plan must therefore continue to safeguard the site for waste management uses.	No change
	3	LNA	Trees: Can you please plant more trees and look at the root cause of why the trees in the surrounding areas are dying and need to be recorded in a registry. (Deptford park)	The council is working in partnership with Street Trees for Living and planting hundreds of trees per year. If you would like to report a damaged or dying tree please contact Green Scene. Details can be found on the Council's website	No change.
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	3	LNA	Please note that TALL building are deteriorating the landscape of the city. This is absolutely not right for mental health and building not more that 4 to 5 levels should only be considered. Who will want to live in an area that is built of tall block of flat, that is horrible.	We know that tall buildings can be a decisive issue for residents. However the London Plan makes clear that tall buildings are part of the solution to tackle the acute housing shortage. The London Plan directs the Local Plan to identify suitable locations for tall buildings. We believe that tall buildings could be considered in our opportunity areas and in certain town centres that have good access to public transport, jobs and local services. We believe this is a sensible and sustainable approach.	No change
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			alongside safer streets and school routes. Prioritise a huge investment in playgrounds and safer streets for children.	refurbishments which are due to take place in the coming months.	
	3	LNA	Polluting Industry Reduce the number of trucks coming to the area by changing the use class of industrial and waste processing sites like scrapyards and private waste processing. Support low pollution industries that create jobs for local people in healthy environments.	Polluting Industry – There are a number of areas in the north that are designated Strategic Industrial Land which are protected by the London Plan. It is therefore difficult for planning to limit the industrial uses on these sites however wherever possible we will try and ensure that these industries move away from heavy industrial uses such as scrapyards etc. to more low pollution industries.	No change
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	3	LNA	And finally the walkway on the old canal street park from geeenland place towards the new development currently being built (phase one completed, and huge un occupied site next to it), please open up a walkway underneath the sloping bridge between this new development and the existing pathway that runs past the tall tower, this will be greatly appreciated and welcome by the community	This will be opened up as part of the Timberyard development.	No change.
	3 -	LNA General	RE: Lewisham Local Plan Please record my comments in response to the consultation on Lewisham's Local Plan: I understand this may be a little late, but I have only just found out about the plans, so the next sentence is paragraph is of some relevance. Can you please send to all people who might be affected by this new plan to have a proper consultation and receive in their letter box official communication of this master plan, how can people be informed about it if you do not send communication? I request for the consultation to be postponed so that people can be properly informed and therefore they will be in a better position to respond. Is this not a legal requirement?	The consultation was carried out in accordance with our statement of community involvement.	No change.
	3	LNA	Polluting Industry Reduce the number of trucks coming to the area by changing the use class of industrial and waste processing sites like scrapyards and private waste processing. Support low pollution industries that create jobs for local people in healthy environments.	Polluting Industry – There are a number of areas in the north that are designated Strategic Industrial Land which are protected by the London Plan. It is therefore difficult for planning to limit the industrial uses on these sites however wherever possible we will try and ensure that these industries move away from heavy industrial uses such as scrapyards etc. to more low pollution industries.	No change
	3	LNA	SELCHP SELCHP is proposed as an integral part of the Local Plan. We have been having issues year after year with the smell of the local waste transport and now we are seeing our trees dying. The activity of SELCHP is 24/7 and they are burning medical waste, people are living close by, this is not acceptable. I would like to ask for this Waste incinerator to be moved to a more appropriate location, particularly as there will be more people in the area. Furthermore, by 2035, incineration will be a more carbon-intensive process than	SELCHP - The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. For the time being, the Local Plan must therefore continue to safeguard the site for waste management uses.	No change

			even landfill. Can you please Remove SELCHP as a priority and move it somewhere else so the borough can meet its climate emergency targets. Even new double glazing does not stop the dust getting in and continuous dusting is a requirement.		
	3	LNA	Trees: Can you please plant more trees and look at the root cause of why the trees in the surrounding areas are dying and need to be recorded in a registry. (Deptford park), not to mention our own gardens.	The council is working in partnership with Street Trees for Living and planting hundreds of trees per year. If you would like to report a damaged or dying tree please contact Green Scene. Details can be found on the Council's website	No change.
	3	LNA	Play & School Routes Play does not feature as a priority North Deptford. Covid-19 has meant children in this high-density area have had little access to high quality play. Existing playgrounds are of low quality. The playground promised in 2014 alongside the £300k+ skatepark has not materialised. This should be delivered and other playgrounds across the area updates alongside safer streets and school routes. Prioritise a huge investment in playgrounds and safer streets for children and plantation of trees for them. And, of course, Lewisham Council must be more aware than most due to the ruling on the death of that little girl in your Borough.	Play & School Routes - The Local Plan is underpinned by the Council's Parks and Open Spaces Strategy 2020-2025 which outlines the key priorities for improvements including many within the Deptford area. Lewisham Council has announced the revamp the play equipment in four popular Deptford parks. Evelyn Green, Sayes Court, Deptford Park and Folkestone Gardens will all benefit from refurbishments which are due to take place in the coming months.	No change
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Deptford Society	3	LNA	**Page 365** Local site allocations for tall buildings and increased population density in the north of the borough contradicts the strategic objectives for healthy and safe communities (G16-19 **page 51**). The identified opportunity areas mapped for the north area on **page 55** are the same areas mapped as deficient to open space on figure 10.5, **page 365**.	We do not agree that there is a contradiction.	No change.
Deptford Society	3	LNA	The plan mostly identifies sites either already with planning or known to be in public consultation but does nothing to profile sites which have the potential to be developed or where development might be encouraged - backlands behind Deptford High Street for example.	The draft Local Plan site allocations focuses on sites above 0.25ha but recognises the positive contribution smaller sites will make to the borough. In particular please refer to policy on small sites. The Local Plan will also be supported by Supplementary planning	No change

				documents, masterplans and Frameworks and in particular the Council's Small Sites SPD.	
DNA	3	LNA	**02** Most of the objectives and policies for the North sub-area section in emerging Local Plan seem to be concerned with New Cross area and we ask to make them more Deptford relevant. We propose as a starting point to the following set of Objectives from the Deptford Neighbourhood Plan. Nearly 200 people from a cross section of the community have stated their full support for them. We developed the following five policy themes to focus our planning policy initiatives: 'Living in Deptford', 'Local Economy & Employment', 'Heritage & Identities', 'Health & Wellbeing' and 'Child-friendly Deptford'.	Disagree. Many of the objectives cover Deptford	No change.
DNA	3	LNA	**03** All of Deptford is a recognised **Regeneration Area** in the London Plan. We ask the Council to develop local policy in full compliance with London Policy SD10 Strategic and local regeneration incl. clarity on how local communities are invited and enabled to engage in these matters in a meaningful way. This is in our view especially important as the Infrastructure Delivery Plan seems to be dating back from 2015. The needs of and opportunities for residents and businesses in Deptford are complex and need to be addressed on much more up-to date and hyper local data to guide a programme of priorities and areas for focused interventions in the context of unpreceded growth, the climate emergency, the economic shock and mental health shock from the pandemic and Brexit. Nearly 50% of Deptford children are living in poverty! DNA asks the Council to develop new and test all existing draft polices in regards to their child-friendliness. Other boroughs have developed SPDs and DNA feels that Lewisham needs to ensure it makes all environments child-friendly; LBL also needs to make the wellbeing of children and young people its key priority for planning and regeneration. Children and Young People are at the heart of sustainable development. We would urge the Council to use/borrow the assessment methodology from Hackney's 'GROWING UP in Child-Friendly Places; Supplementary Planning Document, October 2020'.	The draft Local Plan is supported by a revised Infrastructure delivery Plan. An Integrated Impact Assessment has been carried out on the draft plan and policies. We will review the work undertaken by Hackney	No change.
DNA	3	LNA	**05** The Map below indicates Strategic Development Sites as presented in the emerging Local Plan (2021) and shows the quantum of development and their planning status. Sites No1,2,4,5,11,13 as well as 14,15 and 16, located in the Neighbourhood Plan area amount to over 6000 new homes and approx. 90000 sqm of town-centre and employment uses. Deptford high street is currently comprised of about 30000sqm town centre uses for comparison. This highlights the fact that Convoys Wharf is a new town on the river which will change the centre of gravity in Deptford. However, there are no high capacity public transport hubs along the River. We ask the Council in the North Sub Area Objectives section and Key Diagram and Policies to fully integrate Convoys Wharf and Plot 21 into the future planning. There is a shared concern in local communities that this type and scale of private sector development - without the necessary and accessible community, social and employment infrastructures and strategies connecting the new, often relatively affluent communities, with the existing, often economically challenged communities - will lead to an erosion of	Convoys wharf has a live planning permission with an accompanying S106 agreement which outlines improvements to public transport. Convoys Wharf was approved by the then Mayor of London Boris Johnson despite the Council's concerns regarding the scale and massing of the scheme. The Council must now work proactively with the developer to secure the best possible design for each reserved matter application within the parameters of the approved application and design code.	No change.

			community cohesion, more inequalities, identity loss and ghettoisation. In our view, it is likely to lead to regeneration of the type that prices out local people from accessing already scarce amenities, services and opportunities. This concern is more widely reflected in the London Plan's clear corrective approach towards Good Growth moving community cohesion, decarbonising, urban greening and health and well-being infrastructures, improved air quality and more child-friendly environments more at the heart of growth while protecting employment land. Most of those sites included in this site allocation plan have planning consent (coloured in blue lettering), in preparation or live (yellow and orange lettering). A crude population estimate suggests between 12000 and 15000 new residents and between 3000 to 5000 jobs in the Neighbourhood Plan area accommodated on these sites alone. This does not take account of Plot 21 at Convoy's Wharf nor recent and significant new development at Plough Way and infill or retrofitting development in some of Deptford's sizeable warehouse buildings.		
DNA	3	LNA	**06** Currently, the 11 Objectives identified for the Northern Sub Area seem to ignore that there is a second Opportunity Area. The profound changes to Deptford by the building out of Convoys Wharf is not mentioned beyond employment related objectives. DNA asks the Council to change this omission and to take a more proactive approach to use planning obligations locally to improve the quality of life in Deptford. DNA does not support the scale of development at Convoys Wharf but is does support the public access and the opportunities for 'old' Deptford being much better connected with the River Thames. The 'Key Diagram' in North Sub Area section needs updating with a clear link to physically integrating Evelyn Street Local Centre with the layout consented at Convoys. DNA feels this needs much more detail overall for the benefit of Deptford as a whole - especially through directing payments made and committed under planning obligations into highly deprived communities such as Evelyn while planning ahead for needed capacity for walking and cycling (North-South especially).	Disagree. The spatial objectives for the East Area in the draft Local Plan include a footnote which clearly states that the Opportunity Areas include both the New Cross / Lewisham / Catford and Deptford Creek / Greenwich Riverside OAs. The Regulation 19 plan has been amended to provide a stronger focus on OAs at the front end of the plan in OL1, and to reduce repetition in the sub-areas. However, the spatial objectives for the sub-area, place principles and site allocations provide details on how growth and regeneration will be managed within the area, including Deptford Creekside. It is acknowledged that further details on integrating Evelyn Street Local Centre with new developments should be included.	Policy OL1 spatial strategy amended to provide more details around the Opportunity Areas. Local Plan amended with new key spatial objective and policy for Evelyn Street Local Centre.
DNA	3	LNA	**07** In addition, and as shown on the map above, the emerging Local Plan indicates new strategic site allocations for Site 3, 6, 7,12 and is also promoting small sites in the plan area. a. DNA proposes to review all 'new' Site Allocations in the neighbourhood plan areas with a clear 'secured in policy' commitment that these sites, as they are by and large under public sector control, are to become best practice, leading the way in terms of increasing walking and cycling priority, circular economy practises, especially in construction, construction material choices and operation, biodiversity, carbon neutral - fuel poverty combatting development, affordable co-working spaces and live-work units, child friendly spaces while significantly improving the services and the community offer. DNA's Refurbish, Remodel and Retrofit First policy must be at the heart of this regeneration strategy. 'Development which proactively delivers measures tackling the	Officers note that Lewisham's Mayor and Cabinet refused the application for DNA to be re-designated as a Neighbourhood Forum.	The Riverside Youth Club and 2000 Community Centre site allocation has been removed from the plan.

			climate emergency and contributes to Lewisham's carbon neutral by 2030 Action Plan commitment are strongly supported. Especially, if proposals apply a 'Refurbish, Remodel and Retrofit First' approach to dealing with existing structures on-site.' Our ask for public realm led design and development briefs with masterplan is we fully compliant with London Plan Policy D3 Optimising site capacity through the design-led approach. Developing masterplans following Passive Solar Design principles will also be helped by increasing the red line especially if the site and surrounding land is in public ownership in our view. Site 8, 9, 10, 17 and 18 are in this context absolutely relevant and in addition to Site 1,2,4,5,11,13 as well as 14,15 and 16 when it comes to the planning for high capacity active movement corridors (walking and cycling in the main plus scooters and cargo bikes) in this part of the borough, especially when considering the new town at Convoys Wharf that emerges on Deptford Stand. The Mayor of London wants 90 per cent of all trips in the neighbourhood to be made by foot, cycle or public transport by 2041. This requires planning and some radical changes and investment in Deptford. We recognises the last tranche of new site allocations recognises the need to invest in social and community infrastructure as well as industrial land away from the allocated residential-led sites. The Riverside Youth Club and 2000 Community Centre (Site 3), the Albany Theatre (Site 12) and Sites 5,6 and 7 at the edge of Folkstone Gardens are of strategic significance and can if designed well be transformative. The sites promoting new and modernised community, social and commercial uses, supporting this staggering increase in residential and employment populations. However, we feel the site areas as indicated by the red line around site 3, site 12 should be expanded to ensure the best use of land is delivered. All sites require a much needed integration of spaces and functions to deliver better outcomes for the community. Most of the land is under public sector control and the local plan and the site allocations can guide and set a framework **b. Expanded Site Allocation | Site 3 | Grove Street Local Neighbourhood Centre** **Wider area to be included in Site Allocations** The Site Allocation Plan lists the Riverside Youth Club and 2000 Community Centre and focuses on the building only. DNA feels the site allocation should be widened so that together with the community a masterplan and planning application can be prepared addressing local needs and improving the Neighbourhood Centre as a whole, including how the buildings relate to the street, increase in community, health and wellbeing services, shops, affordable homes, especially those for the most vulnerable, making the Local Centre an exemplar for child friendly development, ensuring all are feeling safe after dark, improving connections with to the River and with Surrey Canal Linear Park and Deptford Park. DNA asks the Council to make a policy provision securing a public realm led design and development brief with		

			masterplan in close collaboration with key stakeholders and the community at large for this Local Neighbourhood Centre – This would be an ideal site for Community Collaborative planning – as would the Albany Site too. **c. Expanded Strategic Site Allocation | No 12 The Albany Theatre** DNA agrees with the proposal of the redevelopment of the Albany to fit the 21st century needs and provide more space and programmes for the local community. DNA would like to propose to include the underused market stall area next to the main building into the site allocation to provide in the future a double height covered market, space for young people and a multi-use street-level urban space all year around. DNA asks to detail the identified 5,002 sqm town centre uses as stipulated in the site allocation sheet on page 611 by securing a. the existing amount of theatre space and employment space to be re-provided; b. the existing market stall space to be re-provided in a covered market building at affordable cost to the traders; c. affordable workspace is combined with live-work provision where possible; d. at least 10% of the new homes are for people in need of 'Supported and Specialised Accommodation'; those most in need; e. the current amount of green space on site and all mature trees are retained; f. a green link with Margaret MacMillan Park is delivered; DNA asks the Council to develop a design and development brief or mini-masterplan in close collaboration with key stakeholders and the community in the form of a community collaborative plan.		
DNA	3	LNA	**a. More join-up and integration at Strategic Sites | 5,6,7** DNA supports the site allocations for employment at this location. It is a key link between north and south at the confluence of two parks and a primary school and strategic cycle and walking routes. DNA asks the Council to include about 1000 sq m of town centre uses for site 6 and 7 to allow for uses that may support the employment population, significant footfall and illuminate the public realm after dark. The use of the site 6 and 7 for housing is not supported. Noise and air quality are key reasons for objecting to this use at those two sites. This even before Site 8, Surrey Canal Triangle with over 3600 homes and 47000sqm of non-residential use is constructed and operational. DNA asks the Council to make a policy provision securing a public realm led design and development brief with masterplan in close collaboration with key stakeholders and the community at large using community collaborative planning for the 3 sites.	Site allocations 6 and 7 are former Strategic Industrial Land Sites and are required to reprovide the existing employment space as a minimum. The indicative capacities of employment floorspace will provide significant local jobs.	No change
DNA	3	LNA	**a. Additional Strategic Site Allocation Evelyn Street Local Centre** We support the Local Plan proposal to designate the Evelyn Street Shops as a 'Local Centre'. Investment in this	We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.

			part of Deptford is supported because it sits within an area of very highest deprivation, has a number of poorly performing open spaces, poor pedestrian and cycling environments, and provides land and green spaces with social infrastructure that could be improved. DNA asks the Council to make a policy provision securing a public realm led design and development brief with masterplan in close collaboration with key stakeholders and the community at large – using community collaborative planning. The redline area to include Evelyn Green, Evelyn Local Centre and Sayes Court Park with a commitment to increasing accessible green space and a high quality walking and cycling environment as well as improved community services, affordable work space and shops. A priority should be providing improved walking and cycling at this location will link Deptford high street, Deptford Station and New Cross Station with Convoys Wharf town centre, school, jobs, river front and riverbus. Improvements to Evelyn Street Junction via the Cycleway No 4 programme and planning obligation payments from Convoys Wharf should make a start of this investment programme. TfL's proposals, as shown below, are worrying as they do not facilitate a direct crossing between Sayes Court Street and Arbinger Grove, not for pedestrians nor for cyclists traveling north to south.		
DNA	3	LNA	**08** The Neighbourhood Plan has detailed the concept of the North Lewisham Links and promotes this through the **Deptford Green Links policy** and further growth and strengthening of green and social infrastructures at the **Health and Wellbeing Hub Zones** and as well as clusters of affordable co-working space in the creative, green and health and wellbeing sectors, what we call **Deptford Work Anchors.** (See Attached an extract of our draft Regulation 16 policies for your assistance). We would like to discuss with the council to what extent the next version of Local Plan could expand on our work and identity those areas and policy themes as part of a regeneration framework and strategy for Deptford. See attached Deptford Plan draft policy extracts.	DNA are no longer a designated Forum	No change
DNA	3	LNA	**10** In Deptford there are not one but two London Opportunity Areas and a Local Regeneration area designation. And as evidenced in the map above much of the private sector led development is already consented. **The current lack of up-to date social, environmental and economic Opportunity Area evidence base makes it almost impossible to tailor a focused plan-led policy framework allowing the public sector to set priorities, lead and guide development and improve the health and wellbeing and prosperity in Deptford. This is fundamental to make best use of land and the planning obligations in our view**. While a piecemeal private-sector led neighbourhood development might be acceptable in a low growth and/or affluent places with great infrastructures already supporting residents and businesses to operate at their optimum - it is, we feel entirely unacceptable for Deptford – **especially taking account of the need to collectively respond to Climate Emergency and Pandemic**	Noted. The Local Plan is subject to an Integrated Impact Assessment which tests the spatial strategy and detailed polices. Please refer to this document for further details.	Policy OL1 spatial strategy amended to provide additional information on Deptford, Creekside Opportunity Area.

			at all scales urgently-. Deptford is already the most densely part of the borough (120000+ people per km2) and with many of the Super Output Areas in the top 5% most deprived areas in all of England. DNA wants the Local Plan to recognise that nearly 50% of our children live in poverty, after housing cost (pre-pandemic data) and so many of our elderly living in poverty too. The Local Plan and Infrastructure Plan absolutely must addresses this unacceptable situation pro-actively, as priority and adequately with a focused area specific land-use planning and infrastructure plan. **About 60ha of the Deptford Neighbourhood Plan area is public estate land and taking the streets and parks into account we feel the level of public control should lead to a set of policies specifically working with these assets to maximise the local benefits that can be generated from a post-carbon economy, a circular economy and a drive and need for more healthy urban environments in an area which will double in population.** We therefore ask the Council to test and direct policies so they address the needs of the most vulnerable and develop focused strategies and policy framework for Deptford, especially focused on the land and assets they and other public sector agencies have control over. Leading by example will be critical in Deptford where much of the development is already consented and a spatial strategy identifying where already secured and forth coming planning obligations and Section 106 monies should be invested maximising public good: Consultation from our Reg 14 Survey will help the Council to establish the community's priorities for S106 community projects within the DNA Neighbourhood Plan Area. The Sub Area approach in the current version of the Local Plan could facilitate this more fully and taking Convoys'. It does not do that sufficiently in its current form.		
DNA	3	LNA	**CHILD-FRIENDLY DEPTFORD – other comments:** www.allianceforchildhood.org. I've attached the calculation for Convoys Wharf plots 8 and 15. The calculator they used has been revised because it underestimated the number of children, for example by assuming that people in 2 bedroom accommodation tend not to have children. Because of overcrowding arising from the lack of affordable property families do move into 2 bedroom units. The calculator was revised in 2019. Here is a link to the GLA population yield calculator: https://data.london.gov.uk/dataset/population-yield-calculator Some boroughs have adapted it to suit their own population distribution. It would be good if Lewisham could do the same. DNA has a plan which will show the green routes, which would also be playable space for children. Both the minimum 10 sqm space and playable routes are important. Linked to the importance of involving children in the design, especially of public spaces, green spaces and	Convoys wharf has a live planning approval. Details of green space and play space provision can be found in the design documents associated. The Local Plans policies on affordable housing are in broad conformity with the London Plan and have been thorough tested through the SHMA and Viability Review.	No change.

			streets that DNA is putting forward – here is a further comment from Marion: is it possible to extend the policy to include involving children more generally in the design process not just in major developments? DNA would like LBL to come back to us regarding assumptions made and being used for the education and school provisions and section 106 contributions on the Convoys Wharf site – we know from our own Reg 14 consultation process that there is a strong need for secondary school provision on the Convoys Wharf Site which also includes Special Education Needs provision within it. DNA COMMENTS ON 'SO-CALLED AFFORDABLE HOUSING CATEGORY OF SHARED OWNERSHIP': DNA's Neighbourhood Plan focuses on the need for truly affordable housing – which is LBL Social Rent or Affordable rent (if this is still 60% of market rent for people in Lewisham?). London Affordable rents are on average up to 50% higher than council social rent, and 30% higher than Housing Association rents. Excellent recent article demonstrating why Shared Ownership should not be seen as genuinely affordable: https://www.sharedownershipresources.org/an-expert-on/shared-ownership-and-the-impossible-dream/		
DNA	3	LNA	Evelyn Street 'local centre'. Historically Evelyn Street had many more shops than it presently has. Other 'feed' in streets can be encouraged, too, to have local shops and workshops once again. To encourage "Keep in Local" in leisure and work.	Evelyn Street is identified as a local parade in the Local Plan	No change.
Environment Agency	3	LNA Site allocations	**North Area feedback** Some of the sites in this area are also close to a number of permitted waste management sites and also in neighbouring boroughs. For the latest list of permitted waste sites with an Environment Agency permit visit our public register in the link below and search by site address or local authority https://environment.data.gov.uk/public-register/view/search-waste-operations This area has some ongoing issues with fly tipping so it is essential proposed development and any vacant sites/buildings have strong security measures to protect development sites from trespass and illegal waste deposits. *LB Lewisham officer note: Table of sites with water management information included in original representation.*	Noted.	The Local Plan Part 2 waste management policies have been updated to reflect that there are existing sites with EA waste permits that require safeguarding in accordance with London Plan. The Local Plan has been updated with additional policy points dealing with amenity in terms of waste management.
Lewisham Cyclists	3	LNA	Page 561 Key Spatial Objective 8 in the main document refers to "transform the A2 into a Healthy Street". We	Noted.	Local Plan amended by referencing the Healthy Streets Approach.

		Key spatial objectives	would suggest the wording of this is altered to “adopt the healthy streets approach along the A2 corridor” and encourage the planning team to follow TfL guidance on this which is clear and unequivocal. This should also form part of the strategic planning document for the whole corridor, and form conditions of planning along the corridor, including CIL contributions to part fund improvements.		
Telegraph Hill Society	3	LNA	Key spatial objective 1 : We are significantly concerned over the intent behind the reference to “a new modern station at New Cross”. We assume, firstly, that this means New Cross Gate and not New Cross. On that assumption, as we have stated in all previous submissions, we believe that, whilst new station buildings would be required to the north of the existing building and underground, it is important for the heritage of the area that the existing station building on the New Cross Road – which is a distinctive feature of the area – should be retained. We note that § 15.59 states that the “creation of a new Bakerloo Line station should integrate with the existing station” which, contrary to KSO 1, implies the retention of the existing station buildings. The “a new modern station at New Cross” in KSO 1 could best be omitted or, if not, reworded to say “with station improvements at New Cross Gate”.	Noted – yes this means New Cross Gate. A new modern station could be developed which integrates the old. This will be thoroughly tested at the Development Management stage when proposals are brought forward.	Text amended to New Cross Gate
Telegraph Hill Society	3	LNA	Key spatial objective 8 is not acceptable as worded. The A2 is a major arterial network taking traffic from the whole of Kent and much of Sussex into central London and back out again. Any attempt to make it “into a ‘healthy street’ with public realm improvements that make walking, cycling and use of public transport safer and more convenient” is likely to push traffic onto residential roads, particularly across Telegraph Hill (see also paragraph 211) but also through the streets to the north of New Cross in order to gain access to the A200 as an alternative route. Static and congested traffic creates pollution. Spreading traffic across residential roads adds to the pollution on those roads, creates additional hazards for pedestrians, and adds to noise disturbance to residents of those streets. In short, making the A2 a “healthy” street risks making large proportions of the rest of the area less healthy. The policy should be reworded to include a proviso that this will only be done provided that no traffic is displaced onto residential roads and, as suggested under paragraph 211 that this will be established in advance by robust and transparent modelling and monitored thereafter.	We acknowledge that the A2 is a key arterial route and will continue to accommodate large volumes of traffic. However we still believe that improvements can be made to improve walking, cycling and public transport in line with TFL’s heathy street guidance. This will not impact on adjacent residential streets and any proposals will be tested thoroughly.	No change
Telegraph Hill Society	3	LNA	An alternative key spatial objective, which should be pursued, is to accept that the A2 is a major arterial road, to move cycling provision on to routes parallel to the A2 and to move, over time, the key shopping provision from the main road onto other sites (see our comments on shopping in paragraphs 169-171 above and on cycling- and pedestrian-friendly routes in paragraphs 238 and 250 below.)	We acknowledge that the A2 is a key arterial route and will continue to accommodate large volumes of traffic. However we still believe that improvements can be made to improve walking, cycling and public transport in line with TFL’s heathy street guidance. This will not impact on adjacent residential streets and any proposals will be tested thoroughly.	No change.
Telegraph Hill Society	3	LNA	As regards the statement in § 15.5, whilst we agree that the high street in Deptford may offer a “rich and vibrant mix of shops” it is hard to see that New Cross/New Cross	This is subjective	No change

			Gate does so. The retail take is, in our view, poor being mainly confined to food provision, off licences and a couple of dry cleaners (again refer to our comments on the shopping offer (paragraph 169) above.)		
Telegraph Hill Society	3	LNA	The Development Requirements (**§ 15.59**) need specifically to reference a requirement for a cycle/pedestrian route as an extension across the railway line from Hatcham Park Road to Batavia Road. This route is critical in that it will allow access to Fordham Park open space from any new development and will provide a safe route for cyclists without restricting traffic flow on the A2 and thereby prevent the need for measures that would increase traffic on residential side roads (see paragraphs 238 and 239 above)	This is captured within the site allocations.	No change
Telegraph Hill Society	3	LNA	Any Development Requirements (**§ 15.59**) and Development Guidelines (**§ 15.60**) for the site should include a specific reference back to the need for new green infrastructure and social infrastructure. Major objections to the previously proposed Hatcham Works developments from local residents included the impact of additional units on already crowded local parks and medical facilities (see Appendix 2). There should therefore be the requirement that any new development must not reduce the amount of available green recreational space on a per capita basis for the surrounding area and, given the identified lack of such existing space in the area, must increase it if possible.	The former Hatcham Works site is a highly accessible site in a District Centre and is suitable for high-density development. Whilst the site will accommodate open space and amenity space appropriate for a mixed-use town centre development it is not a development requirement to have a large public park. The site is within walking distance to Fordham Park.	No change.
Telegraph Hill Society	3	LNA	Any Development Requirements (**§ 15.59**) and Development Guidelines (**§ 15.60**) should further require that any redevelopment of the site should include a supermarket provision.	The indicative site capacity for the former Hatcham Works Site includes 17,550m2 of non-residential uses – which is more than adequate to accommodate a supermarket.	No change.
Telegraph Hill Society	3	LNA	The Development Guidelines (§ 15.60) should be reworded to require that the development includes no buildings that would dominate the Hatcham Park Conservation Area and should generally be limited to no more than six to eight stories (please refer to both Appendix 1 and Appendix 2). Designs should reflect the local character rather than merely and ambiguously "respond positively to the local character".	The indicative capacities for the Former Hatcham Works site has been informed by the New Cross Gate Area Framework. This provides an indicative layout and massing for the site which is deemed appropriate by the Council. The former Hatcham Works site is a highly accessible site in a District Centre and is suitable for high-density development.	No change.
Telegraph Hill Society	3	LNA	The Development Guidelines (§ 15.60) need to ensure that adequate consideration is given to traffic flows such that they do not impact adversely on the Telegraph Hill and Hatcham Conservation Areas. We were deeply concerned about the Council proposals and the Sainsbury's/Mount Anvil withdrawn proposals for the "Hatcham Works" site which, we believe, would have directed considerably more traffic through Telegraph Hill on a North-South route. We note § 15.59 which states that the integration of the site "will require a hierarchy of routes with clearly articulated east-west and north-south corridors". We would like the policy to make clear that this refers only to walking and cycling connections and not road connections. There is no north-south road corridor at present and, indeed, in the 1990s the junction between Jerningham Road and the New Cross Road at New Cross Gate Station was specifically re-	Sites within the New Cross Gate Area will be car-free as per the London Plan parking requirements. A Transport Assessment will accompany any planning application for the site which will assess traffic flows through the area.	No change

			designed after lobbying by the Telegraph Hill Society, with huge community support, to minimise the impact of north-south traffic generated by the development of the Sainsbury's supermarket and other retail outlets (there had been no significant traffic prior to that point). Given the residential nature of Telegraph Hill and the location of the Haberdashers' Askes' two schools at the north and south ends of Jerningham Road, we will strongly resist any proposal that would facilitate an increase in traffic along this road and through Telegraph Hill.		
The Hatcham Society	3 3	LNA Key Strategic Objectives LNA SA 08	We find it very troubling that Lewisham in their North area Plan looks to "safeguard strategic waste management sites including SELCHP" while promoting the redevelopment of Millwall Football stadium adjacent to SELCHP with 2,500 new homes planned. According to the aforementioned GLA commissioned report, "Emissions from the five EfW facilities within Greater London are predicted to be associated with 15 deaths of London residents per year." With this in mind, we do not believe it is ethical to both safeguard SELCHP and build more homes so close to the incinerator.	The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. For the time being, the Local Plan must therefore continue to safeguard the site for waste management uses.	No change
Transport for London	3	LNA Key Spatial Objectives	While we recognise that this local plan is generally supportive of cycle hire, we specifically recommend including cycle hire expansion in the Lewisham North Area which is both realistic and desirable, given the current cycle hire strategy to reach Greenwich Park, in line with CS4 expansion. However, with the success of cycle hire, TfL would also hope to work with the Borough to see if it might be possible to extend to other places. This would require land and funding to be secured e.g. through developer obligations. '8. Transform New Cross Road (A2) into a 'healthy street' with public realm improvements that make walking, cycling and use of public transport safer **and more convenient, and which support any expansion of cycle hire to the area'.** '9. Maximise the recreational and amenity value of the River Thames and Deptford Creekside by transforming the riverside area into a vibrant neighbourhood and visitor destination. Enhance public access to the river, including by repairing breaks in the Thames Path and Waterlink Way, as well as enabling river bus services at Convoys Wharf **and by providing opportunities for cycle hire expansion into this area'.** '10. Protect and enhance open and green spaces, including waterways. Continue to deliver and expand the North Lewisham Links, a connected network of high quality walking and cycle routes that link these spaces**, including supporting the potential for any cycle hire expansion along these routes.** Ensure these routes address existing barriers to movement, such as those caused by the tangle of railways and major roads'.	Noted.	Local Plan amended to incorporate stronger direction for expansion of cycle hire in North Area.

London Wildlife Trust	3	LNA 01	We support this principles, especially in respect of Part F.	Support noted.	No change.
Port of London Authority	3	LNA 01	**11. Policy LNA1: North Area Place Principles** Figure 15.2 must be updated to highlight the safeguarded wharf boundary for Convoys Wharf, and also must highlight the proposed riverbus stop at Convoys wharf, to the east of the safeguarded wharf boundary, as part of the public transport improvements for the area. Support the reference within the Transport and Connectivity section of the Local Plan and this policy on the support to enable riverbus services at Convoys Wharf. As part of part A(e), on 'land safeguarded to secure the delivery of strategic transport infrastructure', it is recommended that the Safeguarded Convoys Wharf is also highlighted here, which as noted elsewhere in this response is safeguarded for waterborne freight cargo handling which will help to achieve the councils objectives to facilitate good growth and achieve modal shift to more sustainable transport modes. In addition, support the reference to riverbus services within key spatial objectives no 9 for this area which proposes to maximise the recreational and amenity value of the River Thames and Deptford Creekside by transforming the riverside area into a vibrant neighbourhood and visitor destination, by enhancing public access to the river, including by as enabling river bus services at Convoys Wharf.	The Safeguarded Wharf is outlined in Fig 11.4 within Part Two relating to Policy SD9 Water Management and referenced within the Convoys Wharf Site allocation. The sub are map depicts strategic features and designations. The riverbus stop is too detailed to be shown on the map.	No change.
Telegraph Hill Society	3	LNA 01	As stated in the preceding paragraphs, we have considerable concerns as to whether this policy is either achievable or, indeed, desirable. We agree that the A2 is a strategic movement corridor, but are deeply concerned that giving "priority to safe and convenient movement by walking and cycling" as set out in LNA2A.C and LNA2.D will push traffic onto residential roads, in particular across Telegraph Hill but also through the streets to the north of New Cross to gain access to the A200 as an alternative route. The A2 is the primary traffic route and must remain so. Issues around cycling can be dealt with by parallel cycle routes avoiding the A2 and shopping can be encouraged off the main road by the re-imagination of the shopping centre utilising vacant land to the north of the A2. This policy as it presently stands, is not acceptable and will be strongly opposed by residents.	We acknowledge that the A2 is a key arterial route and will continue to accommodate large volumes of traffic. However we still believe that improvements can be made to improve walking, cycling and public transport in line with TFL's heathy street guidance. This will not impact on adjacent residential streets and any proposals will be tested thoroughly.	No change
	3	LNA 02	New Cross Road has the worst pollution London. Plans in the LLP to improve the air quality directly contradict the expansion of residential properties in the area by more than 6000 residential units that will bring their carbon footprint in extended vehicle use, services and domestic energy use. The plan cannot claim Green credentials whilst contradicting itself in its methods and aspirations for the area.	Lewisham must plan for the growth required to meet its London Plan target of 1,667 new homes per year. Our view is that these homes are best located in areas which have good access to public transport, services and job opportunities to reduce the need for car use. New Cross is one of a number of areas where the draft plan promotes significant development. The draft Local Plan also sets out policies to reduce car use, insisting on car free development in accessible locations, promoting the use of sustainable forms of transport and identifying significant improvements to public transport.	No change

Lewisham Cyclists	3	LNA 02	LNA2 New Cross Road / A2 corridor Section A; as per point above. In addition, Section D includes “Interventions to support a rebalancing of New Cross Road to prioritise movement by walking and cycling, including by widening pavements and reducing pinch-points”. Lewisham Cyclists expect any public realm scheme involving the removal of the Amersham Vale Gyratory to provide a high quality cycle route to facilitate the future cycling route 11 as per the Transport for London Cycling Action Plan from Deptford along New Cross Road connecting to Old Kent Road on the borough boundary.	Noted. We will pass this on to our Transport and Highways team.	No change
Telegraph Hill Society	3	LNA 02	At a minimum LNA2 should make it clear that the Council will only support proposals for change and will only itself make changes that do not result in an escalation of traffic onto primarily residential roads.	Agreed.	Policy LNA2 amended to address vehicle volume and movements.
Telegraph Hill Society	3	LNA 02	Policy LNA2.B.a should specifically include the need to respond sympathetically to the Hatcham Park, St James and Telegraph Hill Conservation Areas.	The policy states that proposals should respond positively to heritage assets – this includes conservation areas – this is outlined in Policy HE2	No change.
Telegraph Hill Society	3	LNA 02	In respect of policy LNA.D.a, please see our response to Key spatial objective 8 above - whilst we agree that the station will need upgrading to cater for the BLE, the original station buildings contribute to the heritage of the New Cross Road. A new station interchange (as stated here) is acceptable but a new station or an interchange which involves the destruction of the existing station building is not.	A new modern station could be developed which integrates the old. This will be thoroughly tested at the development management stage when proposals are brought forward.	No change
The Hatcham Society	3 3 2	LNA 02 LNA SA 08 GR 05	Bridgehouse Meadows There is currently a section of Bridgehouse Meadows nature conservation area which is gated and hardly used by residents apart from by itinerant dog-walkers. We would love to see that space opened up and turned into allotments and a community wildlife garden for local residents. This area is highly deficient in greenspace and this section is currently under-utilised. With the backing of the council, we would like to open it up and turn it into a positive community space which aims to benefit the residents of Manley Court Care Home and beyond.	We will pass this on to our Parks team	No change
The Hatcham Society	3 3	LNA 02 LNA SA 09	Hatcham Works What we welcome The main positive from the Plan is the protection of the Bakerloo Line Extension as it aims to safeguard the area currently owned by Sainsbury’s for the construction and excavation of the tunnels. We approve of the changes between the draft New Cross Gate SPD and what is now proposed in the Lewisham Local Plan when it comes to proposed reopening of Hatcham’s residential streets to traffic from the New Cross Road. The draft SPD saw the recommendation of creating a "new circular route via Harts Lane" [Point 9, Page 52 of the draft SPD] and the recommendation of creating a "secondary access to Hart [Sic] Lane via Hatcham Park Road - suitable	Support Noted.	Policy LNA2 amended to address vehicle volume and movements.

			for Bus traffic' [Point 4, Page 43. We opposed these changes and 87 residents signed a petition against the reopening of Hatcham to traffic from the New Cross Road. We were pleased to see in the Plan that it now says “The layout of the site should incorporate sufficient space to accommodate interchange between bus, tube, rail, cycling and walking.” [Lewisham's North Area, pg 49] We need this section to be more robustly phrased to completely rule out the re-opening of residential roads to vehicle traffic from New Cross Road to the Hatcham Works site and the proposed Surrey Canal triangle site. If the roads are reopened, this will go directly against the Mayor of London's Healthy Streets Approach which seeks to create streets which are "pleasant, safe and attractive". We also welcome the proposal of a “New walking and cycle access through the site from Hatcham Park Road / Hart’s Lane. This must include a clearly articulated east-west route within the site, also enabling a link from Hatcham Park Road to Batavia Road via a bridge over the railway.” We urge Lewisham Council to push for this new route - in line with policy LNA2 - before the delivery of the Bakerloo Line Extension which may take decades given the dire state of TFL’s finances following the pandemic. We believe this will bring an immeasurable benefit to the residents in the North of the borough who may start cycling more. So many are discouraged from going on their bike in Hatcham because of the prospect of cycling on the hostile New Cross Road.		
London Wildlife Trust	3	LNA 04	We support this policy in respect of Part B.	Support noted.	No change.
	3	LNA 04	it is my hope that your Local Plan for the ongoing development of Deptford Creekside and surrounding areas is carried out with respectful acknowledgement and celebration of the beautiful diversity of life and culture that exists in this spectacular borough and that the upcoming (delayed due to Covid) London Borough of Culture award be positively integrated with the local community which is comprised of many extremely talented and creative individuals and groups. Why not employ local graffiti artists to spray hoarding boards rather than have the constant task of painting over rushed tags of pent up frustration? Why not experiment with tiny house build projects and eco-friendly building schemes such as air-crete, cob, earthbag and strawbale to name but a few options that can bring community groups together to co-learn and co-create whilst instigating and promoting a greener way to thrive even within city lives? The damning process of Tidemill left many folk heartbroken and downtrodden. There is a local resident	The Local Plan provides strategic policies that support the culture and creative industries within the borough.	No change.

			who saved a seed from the Indian Bean Tree and it's growing so well along with some other saplings. (I think that is it's name, forgive me as I've left this to the last minute due to a number of reasons regarding mental health, depression and general connection with the www) Why not plant this to grow in all its majesty on a public site for all to enjoy for generations to come? I heard comparisons that Tidemill wasn't the Hanging Gardens of Babylon or Kew so it didn't matter. How utterly short-sighted and narrow-minded. How about making a Knew Garden? Inviting folk to contribute plants and tips, etc. from around the world? I have faith in the funghi and would love to experiment with its many uses and forms. Plus edible flowers and other wholesome products...I wonder why the polytunnels and greenhouse on the Lewisham College site are still left unused after all this time? Vertical gardening, etc. How about letting us so many artists produce positively without an inherent capitalist start point but from an altruistic foundation? I dream of sound-healing domes and peace memorables, green and parkour spaces for people to meet and integrate and initiate well-being and positive social collaborations and idea-harvesting. Why not implement and encourage positive creativity and collective community actions that can benefit not only the locale but the whole world too?		
Port of London Authority	3	LNA 04	**12. Policy LNA4: Thames Policy Area.** Policy LNA4 must give a specific reference on the need for developments situated alongside Deptford Creek to ensure they are designed in line with the Agent of Change principle. On the Royal Borough of Greenwich side on Deptford Creek there is an operational wharf situated at Brewery wharf, safeguarded by ministerial direction, which can operate for up to 24 hours a day in line with tidal movements. In line with London Plan policy SI15 it must be ensured as part of any future development located in close proximity that any proposals are designed to minimise the potential for conflicts of use and disturbance, including during day and night time periods, to ensure operations at the safeguarded wharf are not constrained. Support the reference in the policy on the need for development proposals to enhance physical connections to the river or creek, including walking and cycle routes that enable access to the waterfront. This is in line with the PLA's Thames Vision which includes the goal to join up the Thames Path from source to sea, including enhancing access to riverside areas. Also support the references in part B (e & f) on the need to resist encroachment into the creek or river and foreshore and the promotion of river-related and marine uses, where appropriate. As part of the aim of the policy to activate the river or creek as an important part of the public realm and	Support noted.	Changed incorporated within policy LNA 4 and other water management policies amended to refer to the Agent of Change.

			contributing to the liveliness of the waterfront, the PLA would support the promotion for increased recreational opportunities at appropriate parts of the river and Deptford Creek within the policy. This is supported by the Thames Vision which includes the goal to see greater participation in sports and recreation on and alongside the river.		
	3	LNA 2	The 'Route 1' Cycle and Pedestrian Bridge A strong positive in the plan is the retention of the plan to build a bridge over the railway. This was a huge plus in the design for Hatcham Works and was even included in the Sainsbury's Mount Anvil plan although they described the bridge as an "aspiration" rather than a concrete realization in their plans. Keeping the bridge and the green 'Route 1' cycle and pedestrian route (including the pedestrian bridge) parallel to the New Cross road is an immense plus as part of the LLP and would link New cross Gate to Fordham Park. New Cross Gate chronically lacks green space to the bridge would provide a significant enhancement to the lives of New Cross Gate residents. Crucially would be transformational to the lives of the children in this area their journey to the local school of Deptford Green infinitely more safe and enjoyable. They would be walking safely away from the polluted noisy New Cross Road or the very narrow and dangerous underpass on Cold Blow Lane. The retention of the 'Route 1' bridge in the New LLP is a significant plus for the future of New Cross.	Noted.	No change.
Transport for London	3	LNA 2	C Development proposals must reinforce the role of New Cross Road as a strategic movement corridor, giving priority to the safe and convenient movement by walking and cycling, as well as the use of public transport. This principal east-west route should be supported by a complementary network of legible, safe and accessible routes, including cycle routes, that link with it to enhance connections between neighbourhoods and places**, providing opportunities for any expansion of cycle hire'.**	Agreed this is addressed in Policy LNA2 New Cross Road / A2 corridor and also within the New Cross Area Framework endorsed by the Council.	Local Plan amended to incorporate stronger direction for expansion of cycle hire in North Area.
Greater London Authority	3	LNA SA 01	In addition, the corresponding Site Allocation for the comprehensive redevelopment of the site should refer more prominently to the role and long-term protection of the safeguarded wharf within the scheme. Safeguarded wharves are important to facilitate sustainable water freight (London Plan para 15.9.4), in particular in close proximity to central London.	The site allocation already mentions Appropriate safeguarding and re-activation of the existing wharf and associated vessel moorings, including for river based passenger transport. It should also acknowledge that the range of uses on the wharf will be restricted to those specified in the S106 agreement	Convoys Wharf MEL site allocation amended to mention long-term protection and to restrict the type of uses on the safeguarded wharf to those specified in the S106 agreement, to ensure compatibility with nearby residential use.
Royal Borough of Greenwich	3	LNA SA 01	Convoy's Wharf: We support the redevelopment of this site and its role in enhancing connectivity and reinstating the Thames Path, as well as the need to have regard to impacts on protected views and the setting of the World Heritage Site in establishing building heights and scale. This site is in close proximity to the Grade II* listed Church of St Nicholas, and the allocation should acknowledge that heritage asset and ensure that development respects its setting.	Noted	Convoys Wharf MEL site allocation amended to include reference to the Grade II* listed Church of St Nicholas.

Port of London Authority	3	LNA SA 01	**Site 1: Convoys Wharf Mixed-Use Employment Location.** In principle support the allocation, which recognises the safeguarded wharf designation and includes reference to the need to reactivate the wharf with associated vessel moorings and up to 32,200 m² of employment floorspace (Sui Generis & Class B2). Support the reference in paragraph 15.21 (development requirements) on the need to reactivate the wharf. As part of this it is considered that specific reference is given in the site allocation on the need for the proposed residential development located in close proximity to the safeguarded wharf, to 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. Support the reference under the development requirements, which recognises the need for the 'repair of breaks' in the Thames Path and extension of the route along the riverfront across the site, or as near as practical having regard to the safeguarded wharf. In principle this is supported and is in line with the PLAs Thames Vision, which includes the aim to join up the Thames Path from source to sea but notes that there are particular challenges in finding the best route near operational wharves and terminals. In addition, within the last bullet point of the site allocation, which refers to the need for Transport for London and the MMO to be consulted on development and design options, the PLA must be added as an additional consultee.	Support noted. The site allocation already mentions Appropriate re-activation of the existing wharf and associated vessel moorings, including for river based passenger transport. It should also acknowledge that the range of uses on the wharf will be restricted to those specified in the S106 agreement	Convoys Wharf MEL site allocation amended to mention long-term protection and to restrict the type of uses on the safeguarded wharf to those specified in the S106 agreement, to ensure compatibility with nearby residential use. Convoys Wharf MEL site allocation also amended to add Port of London Authority as a consultee.
	3	LNA SA 02	The linear park stretching form Greenland Place eastwards should be core to the timber yard development, linking communities, businesses and provisioning an alternative walking route away from Evelyn Street.	The route is seen as a key walking route and will be delivered through the Deptford Landings scheme	No change.
Port of London Authority	3	LNA SA 02	**Site 2: Timber Yard, Deptford Wharves at Oxestalls Road Mixed Use Employment Location.** As highlighted above under policy SD9, specific reference must be given in the site allocation on the need to ensure any development proposals that come forward are designed such a way to ensure there are no conflicts of use or disturbance with the safeguarded Convoys Wharf, in line with the Agent of Change principle.	Disagree. The site is not located near to the safeguarded wharf.	No change.
	3	LNA SA 03	Site 3: The Riverside Youth Centre building is an "iconic" building of the 20th century on Pepys estate and should be refurbished first.	Agree. There are now plans to refurbish parts of the building.	The Riverside Youth Centre and 2000 Community Centre site allocation has been removed from the Plan
DNA	3	LNA SA 03	Site 3: The Riverside Youth Centre building is an "iconic" building of the 20th century on Pepys estate, and should be refurbished first.	Agree. There are now plans to refurbish parts of the building.	The Riverside Youth Centre and 2000 Community Centre site allocation has been removed from the Plan
Lewisham Cyclists	3	LNA SA 04	**Evelyn Court at Surrey Canal Road Strategic Industrial Location;** This site needs to recognise the council transport strategy to deliver Cycleway 4 in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in	Noted	Evelyn Court LSIS site allocation amended to include a requirement for the site to facilitate the delivery of Cycleway 4.

			the development requirements as part of the public realm strategy.		
	3	LNA SA 05	Canal Approach I request that Lewisham Council prioritise reopening Canal Approach towpath, part of Deptford Parks Liveable Neighbourhood as a key strategic route for North Deptford.	The Local Plan identifies this as a key strategic route for North Deptford highlighted in fig 15.2 and underpinned by the North Lewisham Links policy. The Council have been working with local groups as part of the Liveable Neighbourhoods Project to progress the scheme. Due to the financial challenges that TFL find themselves as a result of COVID-19 the project is having to be scaled back in terms of the scope. The details of which are currently being discussed.	No change.
Lewisham Cyclists	3	LNA SA 06	**Strategic Industrial Land (SIL) at Surrey Canal Road and Trundleys Road;** This site needs to recognise the council transport strategy to upgrade Cycleway 10 (previously Quietway 1) in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.	Noted	Surrey Canal Road and Trundleys Road site allocations amended to include a requirement for the site to facilitate the delivery of Cycleway 10.
Lewisham Cyclists	3	LNA SA 07	**Strategic Industrial Land (SIL) at Apollo Business Centre;** This site needs to recognise the council transport strategy to upgrade Cycleway 10 in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy.	Noted	Apollo Business Centre site allocation amended to include a requirement for the site to facilitate the delivery of Cycleway 10.
Sport England	3	LNA SA 08	Surrey Canal Triangle Mixed-use Employment Location Sport England would expect that existing sports facilities and playing field on this site are reprovided to a satisfactory standard; this includes any meanwhile uses. Provision of sports on this site should also be informed by Lewisham's evidence base for sport.	A new planning approval for the Surrey Canal Triangle site has now been approved. The site allocation will reflect this approval.	Surrey Canal Triangle MEL site allocation amended to reflect planning consent granted for the site.
Lewisham Cyclists	3	LNA SA 08	**Surrey Canal Triangle Mixed-use Employment Location;** This site needs to recognise the council transport strategy to deliver Cycleway 10 in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy. As part of the Surrey Canal Triangle Masterplan, development requirements must also recognise the essential need for upgrade to the Connect 2 path running from Bridgehouse Meadows to Oldfield Grove and improve connectivity between Bolina Road and Cycleway 10, all in line with London Cycle Design Standards. CIL and S106 contributions from developers would need to take this into account.	Noted	Surrey Canal Triangle MEL site allocation amended to include a requirement for the site to facilitate the delivery of Cycleway 10. Also amended to include requirement to upgrade Connect 2 path.
	3	LNA SA 08	The improvement of Millwall Stadium is good for the future, but what about within its improvements incorporating the whole structure being covered in solar panels to help provide renewable energy for the local area.	This is detailed point and does not relate to the strategic nature of the Local Plan. Any proposal coming forward for Millwall Stadium will have to address the draft sustainability policies outlined in the plan.	No change.
	3	LNA SA 09	[A] - My last endeavour regarding planning matters in my Borough of Lewisham , was my letter to the Planning Department dated 23 February 2020 . titled - Planning Application DC/19/114283 , Sainsburys SE14 , Housing Density .	Whilst the council can advise applicants through pre-application processes it is entirely up to applicants if and when they submit applications. With regard to application DC/19/114283 this was later withdrawn by the applicant and has no bearing on the Local Plan site allocation.	No change.

			My comment at the recent zoom consultation was that I feel disappointed that the Developer had apparently NOT been guided away from making the Application, by the Planning Department, as it appeared to be rather vulnerably poor. The nominal site area was drawn all over the place , including a little way up both Troutbeck Road and Jerningham Road , also the shops along the New Cross Road , A2 , were serviced from a major bus bay and there was an idiosyncratic relationship with the Hatch Conservation Area . However it may have been just a play around to establish Land Values. Whatever the local community , assume they are being served by the Lewisham Planning Officers , that appears in this case , the community was marginalised , and also there was a great waste of energy , which post pandemic must be avoided at all costs . [a] - The local community is disadvantaged, expertise / time available regarding Planning Application Assessments. [b] - Reduction in Energy, energy waste must become more of a consideration, in the age of the Climate Crisis.		
	3	LNA SA 09	Plans to redevelop the Sainsburys site at New Cross Gate faced major objections recently due to the nature of the proposed development. This included the building of several high rise towers, this would have had a huge impact on the current residents of the area. Due to overwhelming objections, these plans were abandoned. The current plan would see a return to the redevelopment of the site including high rise towers and very little if any green space. Any development of this site would need to take into account the conservation status of the area and not ignore it for high rise single flats that offer no long term value for families.	Where there are no current, advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Site Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site including the the site's highly accessible location, suitable for high-density development as well as reflecting the site's surrounding character and Conservation area. The indicative capacity has also been tested through the New Cross Gate Area Framework that has been endorsed by the council. ~~.~~Based on these considerations, the residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach.	Former Hatcham Works site allocation amended by reducing residential capacity to 800 units, increasing employment floorspace to 7,550m2 and reducing main town centre floorspace to 10,000m2, in line with the New Cross Area Framework.
Lewisham Cyclists	3	LNA SA 09	**Former Hatcham Works, New Cross Road & Goodwood Road and** **New Cross Road;** Both sites need to recognise and acknowledge the future cycling route 11 as per the Transport for London Cycling Action Plan from Deptford along New Cross Road connecting to Old Kent Road on the borough boundary in making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy. Plans for a "new walking and cycle access through the site from Goodwood Road. This must include a clearly articulated east-west route within the site, also enabling a link from Hatcham Park Road to Batavia Road via a bridge over the railway" should require adequate CIL and S106 contributions from developers as a condition of planning	Noted. CIL and S106 are covered in Policy DM2 in Part 4 of the Local Plan.	Former Hatcham Works and Goodwood Road site allocations amended to include a requirement for the sites to facilitate/ contribute to the delivery of Cycle route 11.

			with any bridge design meeting the Department for Transport Local Transport Note 1/20 and London Cycle Design Standards.		
The Hatcham Society	3 2	LNA SA 09 TR 04	There is also the issue that all the extra residents of the Hatcham Works site would need parking space. As it stands in the present we have commuters driving into zone 2 and taking public transport into the centre of London. There is widespread opposition in the community to imposing controlled parking zones (CPZ) in the area so the extra cars and parking spaces generated by the new Hatcham Works would inevitably overcrowd the streets of Hatcham Conservation area with cars.	Any proposal for the Hatcham Works site will be car-free. The Council is supportive of implementing Controlled Parking Zones, only where they have support from the public.	No change.
The Hatcham Society	3	LNA SA 09	Backing the views of the Telegraph Hill Society We wholeheartedly back the majority of the views put forward by the Telegraph Hill Society in response to Lewisham's draft Local Plan. We back the Telegraph Hill Society's view that "there would be considerable merit in designating the Hatcham Works site as the Primary Shopping Area for future development as it has the capacity to create a better local shopping experience than the A2 if sensitively developed." We also believe that the Hatcham Works site is not suitable for tall buildings and believe it would be more in line with the Borough's Vision if the area was developed for retail and for creative employment alongside a new green space. We back the Telegraph Hill Society's view for the Hatcham Works site that "the Development Guidelines (§ 15.60) should be reworded to require that the development includes no buildings that would dominate the Hatcham Conservation Area and should generally be limited to no more than six to eight stories (please refer to both Appendix 1 and Appendix 2). Designs should reflect the local character rather than merely and ambiguously "respond positively to the local character"." We also back the Telegraph Hill Society's view for the Hatcham Works site that "The Development Guidelines (§ 15.60) need to ensure that adequate consideration is given to traffic flows such that they do not impact adversely on the Telegraph Hill and Hatcham Conservation Areas." We believe that the guidelines must robustly prevent any increase in traffic to both Conservation areas.	The indicative capacities for the Former Hatcham Works site has been informed by the New Cross Gate Area Framework. This provides an indicative layout and massing for the site which is deemed appropriate by the Council. The former Hatcham Works site is a highly accessible site in a District Centre and is suitable for high-density development. Any proposal that is submitted for planning will be subject to a Transport Assessment which will assess traffic flows.	No change.
The Hatcham Society	3	LNA SA 09	We also back the Telegraph Hill Society's view that at the very least, per capita green space should not be reduced and the Plan's target should be to increase it. This should be a core Lewisham strategy. We already highlighted in our response (paragraph 36) that we believe Hatcham Works is more suited for a new green space and transport interchange (alongside a Primary shopping area) to fulfil the needs of existing residents. The Hatcham Society would like to see existing green spaces such as the gated Bridgehouse Meadows nature conservation area improved and made more accessible.	The former Hatcham Works site is a highly accessible site in a District Centre and is suitable for high-density development. Whilst the site will accommodate open space and amenity space appropriate for a mixed-use town centre development it is not a development requirement to have a large public park. The site is within walking distance to Fordham Park.	No change.

Transport for London	3	LNA SA 09	This provides strong protection for use of the site as a new BLE station, which we welcome. However, the wording should be strengthened to support the use of the site for construction as well. It should also make clear that the site is identified as a worksite for the BLE and is included in the formal safeguarding directions for the scheme. As such, no prejudicial development should occur before the BLE is delivered. This should be reflected in the text and identified development capacity under the different spatial strategy options. The Borough should consider using the draft local plan for safeguarding lands surrounding the site, including that of the existing railway station (New Cross Gate). This site allocation should also require car-free development.	Noted. The Local Plan must accord with the London Plan, which sets out policy on car parking. Parking for any new development will be car free. The Secretary of State has already safeguarded all of thr land required for the construction and delivery of the BLE.	Former Hatcham Works site allocation amended to make reference to no prejudicial development taking place prior to the delivery of the BLE and to a temporary works site.
	3	LNA SA 09	Hatcham Works is simply too small to house the proposed 912 residential units. Without building skyscrapers that would not be in keeping with the area and in particular the adjacent conservation areas of Hatcham and Telegraph hill. Proximity or otherwise of the tall buildings proposed in the LLP on the land currently owned by Sainsbury's does not solve the problem that huge infrastructure in terms of schools and welfare needed to support this huge influx of residents. In an already densely populated area the LLP is planning to raise the number of residents by 912 bringing the equivalent influx of cars and service traffic for that influx into the area. There appears to be no assessment of the environmental effects of these extra residents and their needs in the LLP. Parking There is also the issue that all the extra residents of the Former Hatcham Works would need parking space. As it stands in the present we have commuters driving into zone 2 and taking public transport into the centre of London. There is widespread opposition in the community to imposing controlled parking zones (CPZ) in the area so the extra cars and parking spaces generated by the new (Former) Hatcham Works would inevitably overcrowd the streets of Hatcham Conservation area with cars. Through Traffic in Hatcham Park Conservation Area I am concerned about how the LLP proposes to connect with the Hatcham Conservation Area. The LLP refers to a "positive" relationship to the Former Hatcham Works, suggesting that – 'There should be a positive relationship with the site's western edge, including the junction of Hatcham Park Road, Harts Lane and access into the site.' (15.60 Development guidelines). This is too vague and open to interpretation. It leaves the possibility open to a potential Developer to puncture through into the former Hatcham Works site	The indicative capacity for the former Hatcham Works site was informed by the endorsed New Cross Gate Area Framework. The site is a highly accessible site and suitable for high-density development. Parking for any new development will be car free. Further details on the key design principles for the site can be found in the New Cross Gate area Framework.	No change.

			from the Hatcham Conservation Area. This was vehemently opposed in the consultation for the SPD, which wanted traffic (buses delivery vehicles and cars re entering the Hatcham Estate. This was also proposed by the Sainsbury's and Mount Anvil developments which were met with a huge amount of local opposition, especially with regard to the placing of the waste facilities of the flats and the supermarket opening out into the conservation area. Our area has become safer quieter and infinitely more pleasant place to live and any ingress of traffic to the Conservation Area of Hatcham Park would firstly go against the healthy street ethic that the LLP wishes to champion and secondly be met with huge opposition by the local community who cherish the quiet enclave created by blocking Harts Lane and Nettleton rd which was an initiative backed by councillors and Lewisham council at back in June 2003 as part of the New Deal for Communities (NDC). These through traffic prevention tools should be safeguarded in the LLP and be labelled non negotiable in the LLP.		
	3	LNA SA 9	On a separate matter: when assessing schemes for the Hatcham Works site, please could you make sure that there will be well-lit pedestrian access from New Cross Gate station back into the Brocklehurst Street and John Williams Close residential areas. At the moment, the car park in front of TK Maxx - which everyone walks through to get home - and Harts Lane, are not safe walking routes at night. Harts Lane is always deserted, because it is only overlooked by three or four houses at Brighton Grove end. Ideally could you require a safe lit route across the Hatcham Works site that approximates to the short-cut across the car park to the ramp down to Harts Lane. In the online meeting, someone suggested that the ramp location could be an entry to the future tube station. That would be good.	These matters are picked up in the site allocation and the Council's endorsed New Cross Area Framework.	No change.
Telegraph Hill Society	3	LNA SA 09 QD 04	For the reasons set out in more detail in our commentary on policy **QD4** (paragraphs 86 to 87) we do not believe the site is suitable for tall buildings and, as set out above, believe it would be more in line with the Borough's Vision for a welcoming borough and its policies on shopping and employment if the area was developed for retail (paragraphs 169 to 171) and for creative employment uses (paragraph 157).	The indicative capacities for the Former Hatcham Works site has been informed by the New Cross Gate Area Framework. This provides an indicative layout and massing for the site which is deemed appropriate by the Council. The former Hatcham Works site is a highly accessible site in a District Centre and is suitable for high-density development.	No change
Telegraph Hill Society	3	LNA SA 09	In terms of the aspiration and desires of residents for a liveable, welcoming and attractive area (which Lewisham's Vision aspires to) we would again refer you to the survey we carried out when the Sainsbury's/Mount Anvil scheme was put forward, which showed, inter alia:	The indicative capacities for the Former Hatcham Works site has been informed by the New Cross Gate Area Framework. This provides an indicative layout and massing for the site which is deemed appropriate by the Council. The former Hatcham Works site is a highly accessible site in a District Centre and is suitable for high-density development.	No change.

			(a) The development was over-dense and over-tall and the capacity for units should be reduced to no more than 7-10 storeys (b) No development should be built before the Bakerloo line is in place (c) There was insufficient provision for green space (d) There was insufficient provision for affordable homes (e) Any development should commit to funding all provision for sufficient new facilities, not just capital spend (f) No development should be built unless it incorporates adequate car parking (g) Concerns over traffic and "rat-running" (h) Concerns over the heritage impact and (I) Concerns over the impact on existing local communities. The full survey results are given in Appendix 2 to this paper. Issues (b) and (d) are addressed in the proposed Local Plan and there is scope, although involving ambiguity, for the proposed Plan to address some of the other points. It is, however, impossible for the Plan, given the current proposed number of development units, to meet the aspirations and wishes of residents as regards issues (a), (h) or (I). Even discounting a dense development and reverting back to the Council's previous (and more acceptable) plan for 200-300 units, any development is wholly inappropriate given the capacity of the current railway lines through New Cross Gate which, pre COVID-19, led to regular situations where the platforms and carriages were dangerously overcrowded, and given the additional demand which will be placed on the railway system by the Besson Street development (recently approved) and any development on the Goodwood Road site. We reiterate, no substantive redevelopment of the site should be considered before the BLE is constructed.	Whilst the site will accommodate open space and amenity space appropriate for a mixed-use town centre development it is not a development requirement to have a large public park. The site is within walking distance to Fordham Park.	
Telegraph Hill Society	3	LNA SA 09	The site considerations in the table on **page 603** should include "Deficiency of Open Space" and "Sensitivity to tall towers". We find the lack of the first of these particularly surprising given the deficiency of public space in the North Area (as outlined in Part Two **Section 10** of the Plan and graphically illustrated in **figures 10.2 through 10.6**). We presume this must be an error as it is clearly a key consideration in achieving a healthy borough as set out in the Vision (see our comments at paragraph 27).	Disagree. The Local Plan is a strategic document and the Council needs to carefully consider the level of detail provided for each site allocation. These matters are covered in Part 2 of the Plan which should be read as a whole.	No change.
	3	LNA SA 09	The plans to develop Hatcham Works seem to be exaggerated on the number of units. At 912 units, it would totally contradict the idea of creating spacious green spaces. Creating so many new units in such a small space would also put a huge strain on local infrastructure, i.e. schools and welfare needed to support this huge influx of residents	Lewisham must plan for the growth required to meet its London Plan target of 1,667 new homes per year. Our view is that these homes are best located in areas which have good access to public transport, services and job opportunities. The former Hatcham Works site at the heart of New Cross district centre has excellent public transport accessibility and excellent access to services and jobs. The indicative capacity	No change.

			One other problem that would be created by so many units, would be the problem of extra traffic and parking, created by residents and services needs Height of buildings is also of concern, the area is surrounded by conservation areas (Hatcham Park and Telegraph Hill) Both of which are made up of low buildings. Another concern I have is the threat of opening up Harts Lane and Hatcham Park conservation area to through traffic and access Hatcham Works. This is currently quiet safe residential area that would be hugely disrupted if through traffic was allowed in.	within the Site allocation was drawn from the Council endorsed, New Cross Area Framework which was extensively consulted on. The density proposed is deemed appropriate for the nature and context of the site.	
	3	LNA SA 09	Hatcham Works is simply too small to house the proposed 912 residential units. Without building skyscrapers that would not be in keeping with the area and in particular the adjacent conservation areas of Hatcham and Telegraph hill. Proximity or otherwise of the tall buildings proposed in the LLP on the land currently owned by Sainsbury's does not solve the problem that huge infrastructure in terms of schools and welfare needed to support this huge influx of residents. In an already densely populated area the LLP is planning to raise the number of residents by 912 bringing the equivalent influx of cars and service traffic for that influx into the area. There appears to be no assessment of the environmental effects of these extra residents and their needs in the LLP.	Lewisham must plan for the growth required to meet its London Plan target of 1,667 new homes per year. Our view is that these homes are best located in areas which have good access to public transport, services and job opportunities. The former Hatcham Works site at the heart of New Cross district centre has excellent public transport accessibility and excellent access to services and jobs. The indicative capacity within the Site allocation was drawn from the Council endorsed, New Cross Area Framework which was extensively consulted on. The density proposed is deemed appropriate for the nature and context of the site.	No change.
	3	LNA SA 09	There is also the issue that all the extra residents of the Former Hatcham Works would need parking space. As it stands in the present we have commuters driving into zone 2 and taking public transport into the centre of London. There is widespread opposition in the community to imposing controlled parking zones (CPZ) in the area so the extra cars and parking spaces generated by the new (Former) Hatcham Works would inevitably overcrowd the streets of Hatcham Conservation area with cars.	Given the excellent public transport connections and to be in conformity with London Plan and Local policies any proposal for this site would be car-free and only require the specified disabled car parking.	No change.
	3	LNA SA 09	I am concerned about how the LLP proposes to connect with the Hatcham Conservation Area. The LLP refers to a "positive" relationship to the Former Hatcham Works, suggesting that **– '**There should be a positive relationship with the site's western edge, including the junction of Hatcham Park Road, Harts Lane and access into the site.' (15.60 **Development guidelines).** This is too vague and open to interpretation. It leaves the possibility open to a potential Developer to puncture through into the former Hatcham Works site from the Hatcham Conservation Area. This was vehemently opposed in the consultation for the SPD, which wanted traffic (buses delivery vehicles and cars re-entering the Hatcham Estate. This was also proposed by the Sainsbury's and Mount Anvil developments which were met with a huge amount of local opposition, especially with regard to the placing of the waste facilities of the flats and the supermarket opening out into the conservation area. Our area has become safer quieter and infinitely more pleasant place to live and any	We feel that the wording within the Site allocation, together with other policies within Section 6 Heritage are adequate to ensure development preserves and enhances the Conservation Area.	No change.

			ingress of traffic to the Conservation Area of Hatcham Park would firstly go against the healthy street ethic that the LLP wishes to champion and secondly be met with huge opposition by the local community who cherish the quiet enclave created by blocking Harts Lane and Nettleton rd which was an initiative backed by councillors and Lewisham council at back in June 2003 as part of the New Deal for Communities (NDC). These through traffic prevention tools should be safeguarded in the LLP and be labelled non-negotiable in the LLP.		
	3	LNA SA 09	A strong positive in the plan is the retention of the plan to build a bridge over the railway. This was a huge plus in the design for Hatcham Works and was even included in the Sainsbury's Mount Anvil plan although they described the bridge as an "aspiration" rather than a concrete realization in their plans. Keeping the bridge and the green 'Route 1' cycle and pedestrian route (including the pedestrian bridge) parallel to the New Cross road is an immense plus as part of the LLP and would link New cross Gate to Fordham Park. New Cross Gate chronically lacks green space to the bridge would provide a significant enhancement to the lives of New Cross Gate residents. Crucially would be transformational to the lives of the children in this area their journey to the local school of Deptford Green infinitely more safe and enjoyable. They would be walking safely away from the polluted noisy New Cross Road or the very narrow and dangerous underpass on Cold Blow Lane. The retention of the 'Route 1' bridge in the New LLP is a significant plus for the future of New Cross. There is also the issue that all the extra residents of the Former Hatcham Works would need parking space. As it stands in the present we have commuters driving into zone 2 and taking public transport into the centre of London. There is widespread opposition in the community to imposing controlled parking zones on the area soothe extra cars and parking spaces occupied by new (Former) Hatcham Works would be detrimental to the area.	Supportive comments regarding route 1 are noted. With regard to parking, given the excellent public transport connections and to be in conformity with London Plan and Local policies any proposal for this site would be car-free and only require the specified disabled car parking.	No change.
	3	LNA SA 09	Re: Ex Railway Depot at Hatcham site/New Cross Gate, Lewisham/planning development Dear Sir/Madam With observation of further planning development of the above site which currently accommodates Sainsbury's supermarket - A very minimal showcase of Public notices have been placed upon few posts within the area of Sainsbury's - detailing the prospect of building development works within the Sainsbury's/car park area ONCE AGAIN. My concern with regards to this specific planning application, is that I, amongst my residential neighbours believed Sainsbury's had withdrawn their building application, to build three ugly extremely tall, light blocking 33 storey tower blocks, and reopen closed roads etc., in	The Local Plan consultation was carried out in accordance with our Statement of community Involvement. Much of this response relates to the Sainsbury scheme which has subsequently been withdrawn. The indicative capacities for the Former Hatcham Works site within the Local Pan has been informed by the New Cross Gate Area Framework. This provides an indicative layout and massing for the site which is deemed appropriate by the Council.	No change.

			the SE14 area. It seems to me, that since the Covid 19 Pandemic, Sainsbury's has underhandedly decided to renew and go ahead with their building application, and only place minimal public notices of the fact, and in so doing covering themselves legally, but in fact hoping that the residents who live within the Hatcham Park Conservation area are so Covid 19 exhausted, that they don't either observe the very few public notices, or have the energy to notice or even begin to repeat a fight against this building application again. Is the council able to inform me otherwise, and correct me if my suspicions are wrong? Or am I indeed correct? If so, then this is absolutely disgusting and intolerable, it totally disregards the mental wellbeing of the residents including myself, who live here, and because Hatcham Park residents have already fought against this ugly, noisy, development from happening, believing we had conquered this horrendous most negative prospect. It would then appear, that our human rights and wellbeing is being utterly ignored and yes, disregarded as insignificant. Hatcham Park, and in particular Hatcham Park Road, is an extremely peaceful and quiet area, it has been for approximately 20 years. However, prior to this peaceful time, Hatcham Park Road, was a noisy, dangerous and awful cut through road, which traffic selfishly used to avoid waiting in traffic queues on the A2. The houses shook, and trembled, the noise was horrendous, and frequently residents were unable to cross the road without fearing for their lives, owing to the constant traffic. It drove us all berserk. As a consequence of this, and as a neighbourhood, for our health and mental wellbeing, we petitioned and fought to get these roads (re: Hatcham Park Road, Nettleton Road, Harts Lane) CLOSED to traffic, for the very reasons explained. Is the council expecting us to go back 20 years, and tolerate the reopening of these roads, and be happy about it, because if this is the case, the council is mistaken? If I am correct in my suspicions, it would appear to me that the concept of reopening our peaceful and safe roads is being considered once again. How dare Lewisham council and property developers, disregard our fight for peace and sanity, especially regarding the fact that our neighbourhood succeeded in obtaining road closures for the benefit of our health and safety. I would like an explanation as to why the council and Sainsburys are prepared to act, as though Hatcham Park residents rights as a neighbourhood and in accordance with our past fight to get and achieve road closures don't matter! If building development does go ahead, then council residents such as myself, should be given the opportunity to either have double glazing installed at the front of Hatcham Park Road houses, despite the heritage tag, (heritage and conservation doesn't seem to be applicable in this Sainsbury's development case), or alternatively council residents should be given the option to move somewhere more peaceful - and to where three		

			33 storey ugly, light blocking tower blocks won't darken our days!! I hope to receive a response, that is honest and helpful and shows that residents opinions, health and wellbeing is being seriously considered and looked after. And that nothing will go ahead, without our knowledge and huge concerns being taken into account???		
	3	LNA SA 09	**Re the Hatcham Works Sainsbury's site…..this is the heart of the community made up by Telegraph Hill, Hatcham conservation estate and the traditional New Cross Gate high st.** **Raising the limit of the number of units able to be built on the site from circa 200 to circa 900 is outrageous. It would lead to the creation of another 'dormitory site' like those already blighting the borough, when what is needed is mixed use for shopping and employment, more parkland, and traditional style homes that aesthetically blend with the homes on the high st and in the 2 conservation areas it adjoins** **The height limit is set already by the relative heights around the site – with 4 to 6 floors being the maximum that would fit. (The high density, 4 floor, mansion block flats on New Cross Rd would be the ideal model to replicate to suit and provide the right look and type of large accommodation units which the locality needs.)** **Until and unless the Bakerloo line comes to New Cross Gate, it would be difficult to make a case even for 200 new residential units on the site. Step one MUST be to provide all of the infrastructure (transport and otherwise) for any new development and only after that should new strain be put on the already creaking amenities we have by the building of new homes.** **Any new 'vertical city' on the site would have the effect of gutting our community by creating a ghetto – a kind of gated community in the centre of our local life and a 'no go' area for all of us already living nearby……and would be resisted strongly by everyone I've spoken to locally. We really ask you to PROTECT our Telegraph Hill/ New Cross Gate community by setting lower development levels for the site in the Plan and restricting what can go there in future years, in order to enhance the community and borough rather than weakening the restrictions which could result in us feeling sold out in the future.**	Lewisham must plan for the growth required to meet its London Plan target of 1,667 new homes per year. Our view is that these homes are best located in areas which have good access to public transport, services and job opportunities. The former Hatcham Works site at the heart of New Cross district centre has excellent public transport accessibility and excellent access to services and jobs. The indicative capacity within the Site allocation was drawn from the Council endorsed, New Cross Area Framework which was extensively consulted on. The density proposed is deemed appropriate for the nature and context of the site.	No change.
	3	LNA SA 09	**Re the Hatcham Works Sainsbury's site…..this is the heart of the community made up by Telegraph Hill, Hatcham conservation estate and the traditional New Cross Gate high st.** **Raising the limit of the number of units able to be built on the site from circa 200 to circa 900 is outrageous. It would lead to the creation of another 'dormitory site' like**	Lewisham must plan for the growth required to meet its London Plan target of 1,667 new homes per year. Our view is that these homes are best located in areas which have good access to public transport, services and job opportunities. The former Hatcham Works site at the heart of New Cross district centre has excellent public transport accessibility and excellent access to services and jobs. The indicative capacity	No change.

			those already blighting the borough, when what is needed is mixed use for shopping and employment, more parkland, and traditional style homes that aesthetically blend with the homes on the high st and in the 2 conservation areas it adjoins **The height limit is set already by the relative heights around the site – with 4 to 6 floors being the maximum that would fit. (The high density, 4 floor, mansion block flats on New Cross Rd would be the ideal model to replicate to suit and provide the right look and type of large accommodation units which the locality needs.)** **Until and unless the Bakerloo line comes to New Cross Gate, it would be difficult to make a case even for 200 new residential units on the site. Step one MUST be to provide all of the infrastructure (transport and otherwise) for any new development and only after that should new strain be put on the already creaking amenities we have by the building of new homes.** **Any new 'vertical city' on the site would have the effect of gutting our community by creating a ghetto – a kind of gated community in the centre of our local life and a 'no go' area for all of us already living nearby……and would be resisted strongly by everyone I've spoken to locally. We really ask you to PROTECT our Telegraph Hill/ New Cross Gate community by setting lower development levels for the site in the Plan and restricting what can go there in future years, in order to enhance the community and borough rather than weakening the restrictions which could result in us feeling sold out in the future.**	within the Site allocation was drawn from the Council endorsed, New Cross Area Framework which was extensively consulted on. The density proposed is deemed appropriate for the nature and context of the site.	
Telegraph Hill Society	3	LNA SA 10	Our objections to densification apply less to this site as the proposed number of units is considerably smaller, although the capacity of the site will depend in part on the development capacity adopted for the Hatcham Works site. A tower on this site would not impact visually on the Telegraph Hill Conservation Area and would impact less on the Hatcham Conservation Area than any tower on the Hatcham Works site.	Any proposal which may come forward with a tall building on the site will be assessed against the tall building policy within the London Plan and Local Plan as well as policies relating to Heritage.	No change.
Telegraph Hill Society	3	LNA SA 10	We consider, however, that this site is especially appropriate for additional retail shopping, moving that shopping from the A2 into a more pedestrian friendly area and the considerations outlined in paragraphs 247 to 253 would also apply this this site. In particular, care needs to be taken that the height of any buildings does not significantly impact on the appearance of the New Cross Road and, in particular, the adjacent Victorian shopping arcade as shown in the illustration accompanying paragraph 130.	The indicative capacities for the site include a substantial amount of town centre floorspace. Any proposal which may come forward with a tall building on the site will be assessed against the tall building policy within the London Plan and Local Plan as well as policies relating to Heritage.	Goodwood Road site allocation amended to minimise impact of tall buildings on New Cross Road
	3	LNA SA 12	Site 12: A new covered market area, all-weather, as a high quality and aesthetically beautiful feature in the area to attract existing and new footfall. To assist in keeping Deptford High Street a viable shopping experience in the later 21st century, after the redevelopment of Convoys Wharf	Too detailed for the Local Plan. We will pass on your suggestion to our Market team.	No change.

	3	LNA SA 12	I have looked on the local plan website and could find no information about the proposed build out of the Albany garden with its '102 residential units' and 'main town centre use floorspace'. At this early stage of your thinking I would like to object in strong terms to the build out on the Albany garden because: a) it will block the light to every space at the back of my property b) it will eliminate a massively important green space, a green lung in the midst of our heavily built up urban area. Please, do not carry this proposal out.	The Albany theatre is identified as a site allocation in the draft Local Plan. The site allocation, which includes the specific requirement to reprovide the theatre use, is intended to secure the long-term future of the Albany. Should a planning application be submitted this will be subject to statutory consultation and you will have the opportunity to share your views on the proposal.	No change.
	3	LNA SA 12	I would like to object in strong terms to the build out on the Albany garden because: a) it will block the light to every space at the back of my property, which would have a detrimental effect to my wellbeing. b) it will eliminate a massively important green space, a green lung in the midst of our heavily built up urban area. Deptford is hugely polluted and we are losing green spaces at a fast rate. The garden is a key space that should be protected	The Albany theatre is identified as a site allocation in the draft Local Plan. The site allocation, which includes the specific requirement to reprovide the theatre use, is intended to secure the long-term future of the Albany. Should a planning application be submitted this will be subject to statutory consultation and you will have the opportunity to share your views on the proposals.	No change.
Deptford Society	3	LNA SA 12	**Page 351/611** It is not clear how the development guidelines for the allocated Albany Theatre site will enhance or improve the existing open space as stated in the green infrastructure proposals. Can a clearer requirement be added to the development guidelines for this site, given that existing green space forms part of the site allocation.	The Albany theatre is identified as a site allocation in the draft Local Plan. The site allocation, which includes the specific requirement to reprovide the theatre use, is intended to secure the long-term future of the Albany. Should a planning application be submitted this will be subject to statutory consultation and you will have the opportunity to share your views on the proposals.	No change.
Deptford Society	3	LNA SA 12	**Page 611** Albany Theatre. Any development of Albany land needs to retain mature trees and safeguard the green space, whilst ensuring the continuity of the historic street market. Development must also protect the enjoyment of public realm on Douglas Way and not create a wind tunnel effect.	Noted	Albany Theatre site allocation amended to include proposals to retain or re-provide the existing green space and mature trees and protect the operational requirements of the street market.
DNA	3	LNA SA 12	Site 12: A new covered market area, all weather, as a high quality and aesthetically beautiful feature in the area to attract existing and new footfall. To assist in keeping Deptford High Street a viable shopping experience in the later 21st century, after the redevelopment of Convoys Wharf. New housing redevelopment needs to be at least 60% to 80% socially rented at Council levels and secured tenancies. At 100% on Council owned land. Refer to DNA housing policies	Market – we will pass your suggestions on to our Market team. The draft Local Policy is for a strategic target of 50% this is has been tested through the SHMA and viability testing.	No change.
Lewisham Cyclists	3	LNA SA 13	**Land north of Reginald Road and south of Frankham Street (former Tidemill School);** In addition to LNA.78**,** the Development Requirements need to explicitly acknowledge the Council's own manifesto commitment to providing protected cycle lanes along Deptford Church Street, adjacent to this site as part of the North South Corridors it describes. This route is	Noted	Land north of Reginald Road and south of Franham Street site allocation amended to include requirement to provide cycle lanes along Deptford Church Street.

			of strategic importance and has been identified in the Council's own Transport Strategy.		
Lewisham Cyclists	3	LNA SA 14	**Sun Wharf Mixed-use Employment Location;** The development requirements fail to recognise the council transport strategy to deliver Cycleway 10 (Quietway 1) which runs over Ha'penny hatch bridge as well as Cycleway 35 (Greenwich to Kent House, running along Creekside). The development requirements should include making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy and should follow London Cycle Design Standards.	Noted	Sun Wharf MEL site allocation amended to include reference to Cycleway 10 and Cycleway 35. As well as requirement added to ensure new development does not result in a reduction of the existing footway or carriageway space.
Royal Borough of Greenwich	3	LNA SA 14	Sun Wharf: This allocation should make specific reference to the potential for tall buildings to be visible from the World Heritage Site and to impact other heritage assets within Royal Greenwich. For example, the site sits behind the Grade II listed former Greenwich Town Hall and its prominent art deco tower. There is a risk that a tall building on this site could undermine the prominence of that tower when viewed from Greenwich Park and from other locations within the World Heritage Site.	Noted	Sun Wharf MEL site allocation amended to reference World Heritage Site and detrimental impact of the views of heritage assets in Greenwich.
Port of London Authority	3	LNA SA 14 LNA SA 15	**Site 14: Sun Wharf Mixed-use Employment Location & Site 15: Creekside Village East, Thanet Wharf Mixed-Use Employment Location** Welcome reference to the safeguarded Brewery Wharf in the site allocation for site 14. This must also be highlighted under site 15 as well. In addition within the development guidelines section, reference must be given to the need to ensure any proposed development at these sites are designed in such a way to ensure there are no conflicts of use or disturbance, in line with the Agent of Change principle, due to the proximity of the safeguarded Brewery Wharf. Welcome the reference in the allocations on the need to protect and seek to enhance green infrastructure, including the Deptford Creek Site of Importance for Nature Conservation (SINC), the intertidal terrace and the sand martin bank at Deptford Creek, and on ensuring the right to navigation is maintained.	Noted	Sun Wharf MEL and Creekside Village East site allocations amended to reference the safeguarded wharf, reducing conflicts of use and disturbance in line with the Agent of Change principle
Royal Borough of Greenwich	3	LNA SA 15	Creekside Village East, Thanet Wharf: The development of the site immediately to the northeast and on the opposite side of Deptford Creek with tall buildings present opportunities for this site to include tall elements that contribute to the creation of a coherent skyline. However, this requires additional guidance, including clarity regarding the site's role in the overall delivery of the skyline. The allocation should clarify that heights on this site should step down from the adjacent tall buildings to respond to the predominantly mid-rise character of the area to the south and west, and to ensure that it does not undermine the setting of the Trinity Laban Centre which, while not a designated heritage asset, has acknowledged architectural value. Consideration should also be given to the impact of tall buildings on this site on views from the World Heritage Site, and to the impact of the cumulative	Noted. The location of specific tall buildings on-site and the impact on the historic parts of the town centre will be considered as part of the Development Management process.	Creekside Village East MEL site allocationamended to reference impacts on the setting and views of grade I listed St Paul's Church, Deptford and the nearby Deptford Creek Conservation Area, Deptford High Street and St Paul's Church Conservation Area, the Maritime Greenwich World Heritage Site and the Trinity Laban Centre

			development of the area, including the Creekside Village development.		
Lewisham Cyclists	3	LNA SA 16	**Lower Creekside Locally Significant Industrial Site;** Lewisham Cyclists believe public realm improvements at this location should link in to providing better interconnectivity with Deptford high street, enabling active travel by reducing vehicular dominance and providing the mentioned green corridor. This should be stated in the Development Guidelines.	Noted	Lower Creekside LSIS site allocationamended to include reference to public realm improvements
Deptford Society	3	LNA SA 16	**Page 622** Lower Creekside Locally Significant Industrial Site. Land along Theatre Arm at 2 Creekside provides access for Deptford's long-term boat-dwelling community. Any development on this land should seek to protect and sustain this community as one of the important characteristics of the Creekside conservation area.	Noted	Lower Creekside LSIS site allocation amended to reference the need to protect and sustain Lewisham's boat dwelling community.
	3	LNA SA 17	I can see that there is a public consultation relating to the Besson Street Site, which to me is surprising because as far as I was aware a proposal was given planning permission for this site despite resident objections. My full objection is attached, but generally we feel that the proposed development is simply too big especially on the New Cross Road side, it specifically takes virtually 100% of the light from the rear of my house, it doesn't serve the community (the job estimates are wildly optimistic, the doctors surgery is relocating (no new jobs) and the pharmacy is not required (there are 3-4 pharmacies within walking distance and lloyds has just closed down showing that there is not a hugely viable business), the affordable rent is not actually affordable (I work for a bank and to afford these flats you need to be earning around £40k a year)… the list goes on. So all in all I think we can do better. But as I said I thought the site has planning permission so don't really understand the remit of the consultation.	The Local Plan is required to identify Lewisham's pipeline of development sites including those that have permission but have yet to be developed. Besson Street has indeed been granted permission and the site allocation reflects the approved permission.	No change.
Historic England	3	LNA SA 09 LNA SA 13 LNA SA 14 LNA SA 15 LNA SA 16	There are a number of site allocations that are located either in or adjacent to conservation areas, or that may affect the setting of listed buildings. As things stand, it does not appear that there has been any analysis of how the allocations would affect the significance of the relevant heritage assets. Indications of maximum building heights, derived from 3Dmodelling, within the design guidelines for these allocations would help provide clarity as to how to avoid harm to heritage significance. Indeed, the recently adopted London Plan policy D9 B(2) specifies that appropriate building heights should be identified in development plans. Furthermore, specifying such heights would also satisfy the requirements of para 16 of the NPPF that local plan policies should be unambiguous. Historic England has published advice on this issue, which can be found here: The Historic Environment and Site Allocations in Local Plans (historicengland.org.uk). We consider that allocations 9, 13, 14, 15 and 16 in the North Area should be revisited on this basis.	Noted. Following the Regulation 18 stage public consultation, the Council has undertaken additional assessments of North Area site allocations 9,13,14,15 and 16 using the Historic England guidance. These assessments will be published as part of the evidence base and have been used to inform the Regulation 19 document.	Relevant Local Plan site allocations amended to reflect the additional heritage assessments carried out.

	3	LNA Site Allocations	I would like to draw your attention to a site for possible development, in case of future changes of use to it. It runs along next to the westernmost track into New Cross Gate, from near Surrey Canal Road down to the Cold Blow Lane arches. I have attached here a location plan with the site outlined. You have included this site within a 'locally significant industrial site' (p6 in 'North Jan 2021 LEWISHAM LOCAL PLAN_accessible.pdf'), but it does not appear within any of the 'site allocations' for which you have outline proposals. At the moment it is occupied by a builders' merchant and a skip hire firm. If these firms move away, this site would be an excellent place for some local amenities: shops, cafe, a small supermarket branch, a public garden/square. There are thousands of people on these estates, and no cafe or corner shop that is really handy. This site might also be good for small-scale business and studio spaces, as well retail and leisure. It is the other side of the railway lines to your site allocation #'6 Strategic Industrial Land (SIL) at Surrey Canal Road and Trundleys Road', so it faces a different population of residents, and need no longer be industrial. The area immediately around it has already changed: it is now a low-rise residential area: the area east of the railway is still industrial, but the area to the west is not. Adding in some local amenities there would make a big difference; not doing so would be missing an opportunity to improve the area a great deal. In figure 5.1 in Part 2 of your proposals, you have designated this site as an 'opportunity area' for tall buildings. It should not be. You have also designated it as 'low-sensitivity' on figure 5.2. It is not. Please don't allow any tall or mid-rise/taller buildings there, That would not be appropriate. This site is right next to all the low-rise residential estates behind Mercury Way and John Williams Close, and just outside the Hatcham conservation area. The view to the east is pretty industrial - but it's still a good open view, in a low-rise area. It would be possible to put in two-storey buildings without going over the height of the railway embankment; three if you dig down half a storey. Please don't just let it fill up with more flats either, with no amenities. The 'arches' building there currently might be suitable for a refurb, in a similar way to the brick-industrial buildings at Deptford station.	We are not adding site allocations to the plan at this stage. We will however review the site as part of any Local Plan review in due course.	No change.

			The Millwall crowd walks past this site along Mercury Way, so cafes or a pub with a garden would thrive, There would still have to be a place to park for the hamburger van on match days. I hope these are possibilities for if and only if the site comes up for change of ownership/occupation.		
	3	LSA	The DLLP discusses the importance of the characterisation of the South Area and refers to The Lewisham Characterisation Study (2019) as having been prepared to support the Local Plan. It identifies areas of the Borough where existing character may be reinforced, re-examined or re-imagined, as set out in Figure 3.2. The study provides an indication of opportunities where growth could be accommodated, including the London Plan Opportunity Areas and major centres such as the Bell Green / Lower Sydenham area. Regrettably, significant and important statements and observations in the DLLP are in error and do not accord with events of recent years. As an example, Bellingham Ward assemblies have not been a forum at which the DLLP has been presented or discussed. The DLLP asserts that those forums have been used for that purpose. I am a frequent attender at these assemblies, I recall no such Assembly where consultation on the DLLP took place. Furthermore, I can find no Agenda or Record or Minutes of a Bellingham Assembly on the Council web-site where the DLLP was formally proposed, discussed or debated. My recall is this. There was a truncated and noticeably short presentation by the Sydenham Society of their proposed Master Plan produced in conjunction with Discourse Architecture. Neither the 3 JGD April 2021 Sydenham Society nor our elected Councillors who were present, discussed the presentation in the context of it forming an inclusive or contributory part of the DLLP. The Sydenham Society at this presentation at the Assembly failed to stimulate any interest and gained no contributory response or input from within the Ward for their proposals. A principal reason for this failure was that the Society for the first time was engaging with Ward residents. A signal failure in the processes that Sydenham Society had deployed to develop its proposals and present a set of preliminary plans with objectives “locked-in” as a *fait accompli* without taking the essential step of consulting with any substantial number of Ward residents at any stage in their process, early or otherwise. It cannot be viewed as a satisfactory outcome that, whatever merits the Sydenham Society Master Plan may or may not have encompassed, the entire proposal lacked integrity. An absence brought about principally as a result of the Society’s decision to engage in consultation only	This response seems to be discussing several different studies. The draft Local Plan has been informed by the Characterisation Study 2019. This was prepared by the Council in collaboration and consultation with Neighbourhood Forums, Amenity and Heritage Societies and other community groups on the planning database. It was then subject to public consultation in accordance with our Statement of Community Involvement and open to all to comment. The masterplan for Bell Green and Lower Sydenham prepared by Discourse Architecture for the Sydenham Society is not a council masterplan. The visioning work prepared by the council for Lower Sydenham and Bell Green was paused and has not been endorsed by the Council. Whilst a detailed masterplan is required for the area over the last 2 years the Council has been focused on our COVID response and recovery and has not had the resources or capacity to commit to a detailed masterplan exercise which would have to involve significant technical studies as well as significant public consultation. The Council has recently received a Neighbourhood Area and Forum application for the area. The application is currently open for public consultation. The Local Plan consultation has been carried out in accordance with our Statement of Community Involvement.	No change.

			with a closed group, in the main Sydenham Society members to the exclusion of those who should have enjoyed the greater entitlement to be consulted, namely Bellingham residents. This has left an air of puzzlement within the ward about an entry in the minutes for the last Sustainable Development Select Committee on 14 January 2021, where, when addressing the Bell Green and Lower Sydenham Vision Study, the minute at 5.3 this appears, " were also noted….The importance of the work carried out by the Sydenham Society". Furthermore, as the LPA has asserted in its presentations in webinar format, the formulation of a Master Plan for the Bell Green area, developed through consultations with residents and businesses, with detailed review of characteristics produced in other studies, combined with the needs of having a clear vision for the Bellingham area over the next 20 years, is both a fundamental necessity and is vitally important. Ward residents welcome and look forward to being engaged in such a process, which until now, such opportunity has not been presented. Appropriate public consultation providing opportunity for all parts of the community, residents and businesses, to come together to shape proposals for development and growth of the area must be initiated in accordance with Lewisham policy on the conduct of public consultations . An extract from the LPA's policy has this statement about the conduct of public consultation: *The statement also aims to ensure that local communities know when, how and for what reason a consultation is to happen.* ***The key objectives for consultation on planning matters are:*** *• Consultation should be fit for purpose, meaning that the nature of the matter being considered will influence the type of consultation undertaken. This will be influenced by the resources available and the ability of the community to participate and respond.* 4 JGD April 2021 *• Consultation should commence early in the process to enable the community to influence decisions and to seek consensus on essential issues (wherever possible).* *• Consultation should encourage wide community involvement and participation should be relevant to people's experiences so as to get the community interested and involved.* *• Consultation should be continuous, with opportunities for ongoing involvement.* *• Consultation should be undertaken with clear processes and well understood ground rules. Involvement should also extend beyond those who are familiar with the system, and should extend to hard-to-reach groups.*		

			Scrutiny of these points provide clear indicators that none of these key objectives have been delivered in the consultation processes referred to in the DLLP. Nor were the objectives met during the Sydenham Society's endeavours to produce a Master Plan for Bell Green. During the preparatory phase for this submission a further Master Plan, possibly commissioned by the LPA, titled Bell Green and Lower Sydenham Vision Study came to light. It emerged that this study had been presented for consideration to the Sustainable Develop Select Committee on 14 January 2021 and that Committee resolved that the report be noted. Once more there is no evidence present in the minutes or in the two volumes of the report *that local communities know when, how and for what reason a consultation* or in this case a Study was taking place. This collective non-conformity with the LPA's own policy is of significant concern and the Council is invited to make a clear commitment to correct this position and deliver its principled key objectives in how future consultations are conducted with Bellingham Ward residents. It is desirable to see a shift in emphasis, address content of the DLLP and seek to have some elements of the plan to be more precisely articulated. It should be noted that because of the afore-mentioned errors, it is not possible to make responses that are specifically cross-referenced to the contents of Section 3. There are, however, a number of issues included in this response which are considered key and the LPA is invited to adopt in the DLLP after errors have been corrected and the draft has been reviewed and corrected. It is with a significant quantum of regret that the conclusion is reached that the contents of the Section 3 portions of the report do not reach a level of or accuracy, adequacy or integrity that deems those portions to achieve a level of clarity that is essential to this process. The Council is invited to redraft the sections affected by these errors and re-engage in a fresh consultation stage for this Area with a new timetable, suitably revised.		
	3	LSA	We are very concerned about many of the items in the Vision documents. It would seem that there is a major drive to greatly increase the number of houses/flats in the borough many at the expense of existing retail outlets e.g. Bell Green, Bromley Road Retail Park. Our feedback is don't do this. We suffer badly from low water pressure in our area and having consulted with Thames Water have been informed that a combination of too many properties being fed by an aged infrastructure means that this is very hard to fix. I	Noted. The Local Plan sets out a strategy to deliver Good Growth in line with the London Plan. It must demonstrate how the London Plan housing target for Lewisham of 1,667 per annum will be met. The London Plan provides a clear direction that out-of-centre retail parks should be considered for redevelopment to make a more optimal use of land. Following the Regulation 18 consultation the Council has commissioned a Retail Impact Assessment and Town Centre Trends Study to inform the appropriate scope for a new centre at Bell Green. The plan	Local Plan amended to clarify the position/scope of the proposed new town centre at Bell Green in the town centre hierarchy. Local Plan amended to include a new standalone policy on water supply and wastewater.

			have found nowhere in the vision documents stating how the water/sewage systems will be upgraded to accommodate this major increase in housing. The vision documents have many very positive aspects but seem very aspirational with no identified plan how it will ever be realised. Please can you supply a high level plan including timescales and costings for the vision in our area?	proposals provide for a new mixed-use redevelopment of the existing retail park(s) which would provide for a rationalisation of retail space but still enable a significant amount of commercial/town centre floorspace to be retained/re-purposed. The draft Local Plan includes policies on water management however it is recognised that further details on this could be included in the plan. The Council has consulted Thames Water during the preparation of the Local Plan and on the Infrastructure Delivery Plan to ensure this type of infrastructure is appropriately planned for. The Local Plan covers a 20-year period. Where possible the plan sets out indicative timeframes for the delivery of key development sites (i.e. site allocations). The Infrastructure Delivery Plan which sits alongside the Local Plan includes details on the indicative timeframes/costings for the delivery of infrastructure and projects which will support the plan's delivery.	
	3	LSA	Looking at the South Area, I wholly support the general approach and understanding that we are dealing with what is now one of the most deprived areas in the country, where the priorities are for social, economic and environmental improvements, and improved commercial, leisure and community developments, together with vital improvement in transport and opportunities for training and employment. You may notice that I do not mention Housing in this context, not that it is unimportant, particularly in the need to strictly manage the growth in largely inappropriate and unsatisfactory Houses in Multiple Occupation (HMOs). However the reality is that the Downham Estate is already a vast area of primarily single story housing, built as one of the London Garden Suburbs after the 1st World War to house families from the slums of the East End and Deptford. What is missing in the area is the broad Infrastructure to encourage the area to thrive and emerge from its stigmatised reputation. The most it can absorb in terms of new housing is very 'small build' in character maintaining low height and the established character of the estate. What needs to be remembered is that Downham has actually LOST a large proportion of the infrastructure it used to have, and has often suffered downgrading within corporate replacement. It used to have a huge Cinema, 'The Splendid' on the A 21, a Pleasure Pond with boats and a miniature railway at Peter Pans Pond, the Downham Tavern, one of the largest public houses in the country, a Dance Hall next door, large enough for theatre and music events (both were on the present site of the Co-op, carpark, and the very small, dark and somewhat unappealing present Downham Tavern). There was a large library, a swimming pool, four banks in the Downham Centre, a quality Department Store I am told, plus Council	Noted. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has been prepared with input from officers across the Council's service areas, as well as external stakeholders and infrastructure providers. Broadly, the draft Local Plan acknowledges the issues of deprivation in the South Area and the area-based policies set out approaches to address this, including by promoting growth and new development in selected parts of the South Area as a means to generate new investment in this part of the Borough, including for new or enhanced community facilities. Separately, there will be an opportunity to fund community based infrastructure projects through the Neighbourhood Community Infrastructure Levy (NCIL), for which the Council has set in place governance arrangements.	No change.

			Estate staff who looked after public green areas and corners and even helped residents to cut their hedges. To top it off there was a tram running through Downham Way to take early morning workers to the industrial centres along the Thames. A film was made where residents, many of them families who had never had a separate bathroom or hot water or their own toilet, a garden and several bedrooms, called Downham a 'Paradise'. As such I would like to see and hear plans and serious proposals for development of Infrastructure, which I imagine somehow connects with the phrase Public Realm? In essence Downham has lost a range of avenues for leisure, and is also limited by poor public transport, and there seems to be little corporate aim to deal with these issues holistically, to perhaps for instance provide for small live/work spaces for local entrepreneurs, and work towards providing quality sports facilities, lite tennis and football, within the Beckenham Place Park development. Although there is a more interesting and varied retail and business provision, than some have believed within the A21 Centre, including a music centre, a theatrical school, a flower shop, IT facilities, the Undertakers, Pet Shop, as well as food retailers and cafes, (which depend on space for local vehicle deliveries), many local people still primarily depend on their cars to get to larger and cheaper shopping facilities. Measures to mitigate pollution are also welcomed, but improved public transport is part of the corollary of reduction in car journeys, and improving breadth of facility within walking area.		
	3	LSA	It surprises me to hear that the Downham Centre area of the A21 can be made into a 'Healthy Street' as it is a polluting, main and busy arterial road to the South, but I am sure local residents would be more than happy if some of the wide pavements can become subject to attractive street-scaping, planting trees, fitting benches and street furniture, making the area greener and more pleasant to utilise as their neighbourhood. Grants for Improvements to Shop Fronts, would also definitely help, but there needs to be a dedicated budget for improving this area which does not just depend on inappropriate developer contributions. Attractive street-scaping would also improve the environment in the secondary area of the Downham Leisure Centre and Co-op on Moorside, leading into Downham Way.	Noted. The A21 is identified in the Local Plan as a key corridor around which growth and new development will be encouraged. New development can help to deliver and fund improvements to the public realm in accordance with the Healthy Streets principles of the London Plan. Grant funding for shop front improvements is outside the scope of the Local Plan.	No change.
	3	LSA	Then I must come to the 'Elephant in the Room', the fact that this Planning exercise left the question of the Wesley Halls, Downham Community Centre, on Shroffold Road, off the Local Plan Consultation. As a Downham Councillor, I am concerned that this has prevented local residents from making public comment within this Consultation, on the reality that the Council intends to clear the site and allow Phoenix Housing to build flats or homes, with potentially very limited Community Provision. This has apparently been on the cards for some time but only very recently confirmed by the Cabinet Member for Housing and the	As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan. We work with the relevant infrastructure providers to prepare the IDP but are reliant on these departments to provide us with all information required. If this issues are not captured in the IDP then please consult	No change

			Lewisham Mayor. I add to this the observation that an area behind Wesley Halls has actually been derelict for many years and could have had a 'small build' provision constructed on it a long time ago. It is my opinion that Downham is an area that is calling out for and to maintain leisure, community and other Infrastructure, not more infill homes, with no extra provision for daily or evening provision, for the very young, the elderly, for training or employment. Planning has to accept that the Wesley Halls facility has provided for 40 years for inexpensive community provision, for Dance, for Martial Arts, for Choirs, Day Provision for Adults with Special Needs, Adult Education, Pre-school play groups, Community lunches, wedding receptions, birthday parties, Faith Services, outdoor community events, and a performing stage within one of the three large halls. The groups providing all of these activities are quite understandably very anxious about plans which would deprive the area of services they are familiar with and enjoy. The Halls will be reopening when the difficulties of the Pandemic ease with Covid-safe arrangements, and have a short respite to potential closure, but the current position is bound to lead to considerable and justified local controversy.	the individual providers. In this case the community's team. Nevertheless, we have strong policies within the Local Plan to protect community infrastruce – see Policy CI1 Safeguarding and securing community infrastructure	
	3	LSA	You may say that my contribution is not looking at the actual sites mentioned for Downham. My comments are as follows. Most of the sites identified are privately owned and within the Local Plan, there is no indication which businesses would be prepared to come together with the Council for alternative development, and what their position is. Housing development on the Homebase/ Argos Centre could give scope for building homes, but would also remove the one large local hardware centre. Should it not revert to a greener aim of recovering the area of the Peter Pan Pond as a leisure garden and promote river naturalisation, if we are looking at environmental mitigation of the air quality effects of the A21? I think that any attempt to remove MacDonalds could be a cause for a community youth 'riot', and I also have doubts about who would be willing to live in a flat above MacDonalds. The idea of a building 'at height' by Sandpit Road, is completely inappropriate in the Downham Estate, unless it is no more than 4/5 floors, something like the development at the bottom of Whitefoot Lane. Regarding the Co-op on Moorside behind the pub, I and local residents would like to retain this as one of the few quality supermarkets in the area, and of course the Public House, Downham Tavern has to be retained or renewed. Another important area is to improve the 'unadopted' walkway on Old Bromley Road, which presents an ugly and unkempt route to the East side entrance of Beckenham Place Park. This needs to link up clearly with the exit to the Woodland Walk on Oakridge Road as part of a local Downham green corridor.	Noted. The majority of site allocations included in the draft Local Plan are in private ownership. The Council has engaged with and formally consulted landowners through the preparation of the local plan to identify whether the proposals and site allocations are deliverable. Feedback from landowners on the Regulation 18 consultation will be considered as work on the plan progresses. The Local Plan recognises and seeks to enhance the amenity/ecological value of the Peter Pan Pond. This is reflected the relevant site allocation. The Local Plan place principle Policy LSA1 sets out the aspirations and requirements for improving access to Beckenham Place Park. However it will be amended in line with suggestions.	Local Plan amended to identify improved access to Beckenham Place Park at east of Park, as suggested.
	3	LSA	What are local residents worried about, Flytipping and litter is a big one, currently a focus of Councillor and Environmental Group response, poor Transport is another one which needs liaison with Tfl and Aviva locally. Unemployment and Poverty, with many families	Noted. The enforcement of flytipping and other nuisances, such as anti-social behaviour, are outside the scope of the Local Plan. However the plan policies seek to ensure developments are designed to protect and enhance local amenity.	No change.

			still dependent on the Mutual Aid Downham Community Supermarket and Voluntary group support. This is the source of much of our casework, and issues like housing management and neighbour problems. The recovery of the area is a huge ask and the policies to make a difference are not always clear, but whatever Planning can contribute to a better, a greener and more attractive, a less deprived and more prosperous Downham, is welcomed.	The Local Plan broadly seeks to facilitate the delivery of new and improved public transport, and the Council has been liaising with the Mayor of London / Transport for London during the preparation of the Local Plan. The Local Plan identifies the South Area as a Strategic Area for Regeneration. It seeks to coordinate investment and supports targeted responses by a wide range of stakeholders to address deprivation and the social, economic and environmental barriers to opportunities experienced by communities in this area.	
Downham Dividend Society	3	LSA	5. The **participation of the local community** in prioritising the challenges Downham faces and developing solutions. Downham has been in poverty for 100 years, consultation has failed to shift the poverty and inequality. We want to recognise and strengthen the local expertise of people who live in Downham. This means local people will be trained and then paid as researchers in mapping community needs. Lewisham Pathways and Downham Dividend Society (CLT) have already developed pilot projects which are ready to be implemented. 6. Rewarding volunteering and the building of the social capital of Downham. The local Lewisham card is not used widely enough in Downham it provides an excellent infrastructure to reward the voluntary activity we wish to incentivise. In addition Downham RSL's could be encouraged to adopt the best practices of other RSL's where tenants get rent holidays or even a small slice of ownership for long term voluntary contribution to the social capital of Downham. (The Downham Dividend). Similarly if the local people are seen as assets increasing access to services through expansion of Local Lewisham card.	Noted. The Local Plan is being prepared in accordance with the Council's adopted Statement of Community Involvement. The Local Plan identifies the South Area, which includes Downham, as a Strategic Area for Regeneration. It seeks to coordinate investment and supports targeted responses by a wide range of stakeholders to address deprivation and the social, economic and environmental barriers to opportunities experienced by communities in this area. The use of the Lewisham Local Card is outside the scope of the Local Plan.	No change.
Downham Dividend Society	3	LSA	7. **Local employment and business strategy**. We are seeking an employment strategy that works for Downham i.e. it must set specific targets for local to Downham. E.g. Phoenix RSL builds housing in Downham but their definition of local is London wide. To date to the best of my knowledge they have failed to employ a single person from their own building training programmes on their housing schemes. We want to set a benchmark target e.g. of 20% Downham based employment (with higher target for Lewisham residents). This will expose all the barriers that hinder local people getting the work in Downham. Then we will devise tailor made solutions. The target for local employment should be increased year on year. 8. The Council recently let a contract to build a fence around the White Foot lane sports field. Once again Lewisham failed to contract with any Lewisham based business, let alone Downham based. The firm came from Sidcup. The Council has significant spending power, as	Noted. The evidence base studies indicate that Lewisham has one of London's smallest local economies. The Local Plan therefore sets out a strategy to support economic development and grow the local business base, along with providing more job opportunities for local residents and communities. Further details are included Part 2 on Economy and Culture. The Local Plan cannot prescribe that jobs/employment opportunities within Lewisham must be reserved for local residents. However, the draft local plan does seek to ensure that new major developments make provision for job and employment training opportunities, particularly during the construction phase, which may be secured by way of planning conditions or legal agreements.	No change.

			recognised in your community wealth building policy, we want it to work for Downham.	Contract tendering is outside the scope of the Local Plan.	
Downham Dividend Society	3	LSA	9. **Downham Love**- Valuing and Celebrating the Diverse communities of Downham. This includes the white working class communities of Downham, members of whom feel their history and culture has not been valued. Downham was built by working class people. There was a very strong community spirit in the 60's and 70's. However it wasn't welcoming to us newcomers. We need to undercut those who will seek to create divisions within our communities by honouring our past histories and creating a shared vision of the future we want for our children.	Noted. The Local Plan recognises Lewisham's diversity. It supports inclusive and mixed communities which is reflected in the plan's strategic objectives.	No change.
Downham Dividend Society	3	LSA	10. **Health, Sport and Well being** - we aim to build a long term alliance with the health sector to meet the physical, emotional and spiritual needs of the community. The Downham Nutrition Partnership, Downham and Catford Health Through Sport Alliance, Downham Forest School alliance are all examples of partnership working with Downham based anchor organisations.	Noted. The Local Plan broadly supports and seeks to improve the health and well-being of the population. This is set out in the plan's strategic objectives and covered in a number of policy topic areas. The Council welcomes, and where possible will support, partnership working by local community organisations.	No change.
Downham Dividend Society	3	LSA	11 A sustainable strategy for the **stewardship of the outstanding natural assets** of the area. There has been gross underinvestment in the assets that were bequeathed to the people of Downham. Examples of Coin Street https://coinstreet.org/ and Westway Trust https://www.westway.org/ and TenemBee here in Downham demonstrates the additional level of resources that can be secured to contribute to the community wealth building agenda when communities participate in the regeneration of the areas they call home. 12. We need to get the Council to adopt an asset based approach to both the regeneration of its green spaces and to the people of Downham Such an approach would use the appreciation in the value of the land to fund services and improvements in the green assets of the area. With so much open space Downham could become a model sustainable village as all new housing could be heated by ground source heat pumps and other sustainable sources. This would provide resources for the upkeep of the green spaces as energy could be sold back to the grid.	Noted. The Local Plan includes a refreshed suite of policies on green infrastructure, which provide a basis for their continued protection and enhancement. Development contributions, whether through CIL or S106, can be used to support enhancements to local green and open spaces. The Council has prepared a Parks and Open Spaces strategy to set priorities in this respect. Part 2 of the Local Plan on Sustainable Design and Infrastructure promotes a transition to more sustainable energy sources. It supports the development of decentralised energy network across the Borough. However, the Council's latest Energy Masterplan indicates that there is more limited scope for DE network development in the Downham area compared to other parts of the Borough.	No change.
Downham Dividend Society	3	LSA	13. Recent impacts we want to prevent: • The outstandingly successful £6m regen of Beckenham Place Park all took place on the 'posh side' of the Park with the 'free' swimming costing £5.50 an hour. Such pricing excludes most Downham residents. Affordable access could be provided through the Lewisham Local card to those willing to volunteer e.g. at the local social supermarket so for every 50 paying we have 10 local Lewisham card but it used to build the social capital of Downham • Also the Eastern extension plan for the park has 10 objectives which don't even mention building links with the Downham community. It could be in Hyde Park!	Noted. The specific arrangements around the management and pricing leisure facilities, including parks and open spaces, are generally outside the scope of the Local Plan. However the draft plan does make clear that where new dedicated open and play space provision is included as part of a housing scheme, this should be designed to be inclusive to all and made free to use. The Local Plan has been informed by an Integrated Impact Assessment which includes an Equalities Impacts Assessment. The Council considers that it is meeting is obligations under the Equalities Act through this process.	No change.

			• Lewisham they have brought in a non- Downham based black organisaton to provide football on the Whitefoot Lane sports field which charges £30 / month for football or £5 for 45mins for under 8's per child which excludes most of Downham. Ten Em Bee a well established black organisation rooted in Downham cross subsidises its provision through the use of its land and charges £20/ month including kit. • Similarly a New Cross based organisation was allocated the only 'community plot in the Oldstead allotments and brought in an outside black organisation to 'teach Downham black people how to grow food' We have 3 black-led organisations in Downham already doing this work. It is counterproductive and disrespectful of our struggles for officers based in Catford to carry on such practices. **Key reports**: Race and Health Inequalities: http://www.instituteofhealthequity.org/about-our-work/latest-updates-from-the-institute/build-back-fairer The local plan needs to be aligned with community wealth building approach: https://www.cumberlandlodge.ac.uk/read-watch-listen/resilient-communities-cumberland-lodge-report-july-2020 which has been adopted by Lewisham Council.		
Lewisham Cyclists	3	LSA Figure 17.2	FIgure 17.2, the map shown has a number of errors, including missing alignment for the Ringway corridor. This should be amended.	The plan has been revised to include a figure that incooperates the strategic green links and cycle infrastructure.	'Lewisham Links' maps added to each sub-area.
Sydenham Society	3	LSA	**17 LEWISHAM'S SOUTH AREA** (p673) **The Sydenham Society supports the following comments made by Discourse Architecture in their recent submission, as reproduced here.**	Noted. Responses to additional representations set out elsewhere in this Consultation Statement.	No change.
Sydenham Society	3	LSA LSA SA 01, LSA SA 02 LSA SA 03 LSA SA 04 LSA SA 05	**Lewisham's South Area PART 3 – Site Allocations** (p699) *Comments on Sites 1, 2, 3, 4 & 5 are given together:* *1 Former Bell Green Gas Holders* *2 Bell Green Retail Park* *3 Sainsbury's Bell Green* *4 Stanton Square Locally Significant Industrial Site* *5 Sydenham Green Group Practice* **Comment** We strongly agree that proposals for the above sites should be made within the context of a Council-led master plan informed by the framework of proposals initiated by Discourse Architecture and the Sydenham Society. Our own community consultation at public meetings organised by the Sydenham Society (Railway Tavern 06.03.19 & Livesey Memorial Hall 12.09.19) identified a number of key areas of concern to local people that are not adequately addressed in the draft Local Plan:	Support for master-plan led approach noted. The Council acknowledges the strong local interest in a masterplan for the area and work undertaken by the community to support this. The Council will continue to take a lead role on the preparation of a masterplan to support the delivery of the Local Plan, working with and consulting a range of stakeholders including the local community and landowners. Part 4 of the Local Plan deals with delivery and monitoring. Policy DM 3 (Masterplans and comprehensive development) and provides the strategic approach for phasing and delivery of large sites. The Council will continue to work with and lobby Transport for London to improve bus services	Bell Green Retail Park and Sainsburys Bell Green Site allocations amended to reference options for the provision of a new railway station

			• The need for immediate action to improve the services and amenity in the area. There is frustration that proposals planned for the very long term may never happen and an appetite for modestly scaled interventions in the short and medium term, for example, to improve pedestrian crossings, and reduce the dominance of roads and associated air pollution. Proposals for Bell Green should recognise and facilitate the probability of incremental development as sites become available at different times. • Poor bus connectivity, particularly east-west along Southend Lane is a major complaint. We therefore argue that provision of a bus station with potential future inter-modal connections to the station for rail or Bakerloo Line services should form an integral component of the site redevelopment. • Redevelopment should not result in the loss of the hub of conveniently located retail units. It should be made clear that intensification and mixed-use redevelopment need not involve the loss of retail, but will allow the introduction of additional uses to the site We believe that the Local Plan brief for new development at Bell Green can be successfully achieved with a layout based on established urban precedents for street-based architecture. The urban model of towers and slabs with poorly characterised spaces between, that has been adopted at Deptford and Lewisham town centres, should be replaced by a more regulated approach that is focussed on creating a positive public realm and spaces between buildings**.** The enhancement of the Waterlink Way should be bolder and incorporate a new east-west branch connecting to Perry Hill. Para 17.30 • *Development must not result in a net loss of industrial capacity, or compromise the functional integrity of the employment location, in line with Policy EC 5 (Locally Significant Industrial Sites).* We support the retention of employment uses at Bell Green, but question whether the Stanton Square Locally Significant Industrial Site is an appropriate location for industrial activities, particularly the current low-intensity uses, which include a personal storage warehouse and a scaffold yard. We suggest that these activities will be a poor use of a site in close proximity to dense mixed uses and well-served by public transport. Instead, the employment emphasis at Bell Green could be related to retail, commercial, health, education, and hotel uses,	throughout the Borough, and particularly where these are needed to support levels of growth planned. The Local Plan proposals for the redevelopment of the Bell Green are likely to result in a loss of an element of existing retail floorspace. This approach is supported by the latest Retail Impact Assessment and Town Centre Trends Study, which indicates a diminishing need for retail floorspace over the long term. However, the local plan is proposing a mixed-use redevelopment a new centre within Bell Green which will provide for retail as well as a wider mix of main town centre uses. The designation and safeguarding of Stanton Square as an LSIS is supported by the Council's Employment Land Study. The local plan seeks to enable the redevelopment of this site for a wider range of uses whilst ensuring no net loss of industrial capacity. This will complement the proposals for regeneration on other sites in this area, led by the masterplan. The Local Plan supports a transition to carbon neutrality. As part of this, the delivery of a decentralised energy network is identified in the South Area key spatial objectives. Its feasibility is demonstrated by the Council's latest Energy Masterplan. The Part 2 policies on Sustainable Design and Energy support this approach. Bell Green Retail Park and Sainsbury's Bell Green site allocations already incude a requirement for improved east-west links from/to Waterlink Way.	

			combined with smaller-scale residential related uses, recognising the emerging prevalence of live-work arrangements. An appropriate response to this economic trend would be to design residential units adapted to facilitate the growth in home working, whether remote office working or smaller home-based businesses. These could range from provision of rooms or spaces within residential units that could be used as home offices, to residential units with street access to integral retail or workshop accommodation . Finally, we would argue that the aspiration to build a sustainable future should be much bolder, making Bell Green a zero-carbon development.		
Discourse Architecture	3	LSA Para 17.10	The preparation of a Supplementary Planning Document and/or Masterplan by the Council is supported, provided that the development of the masterplan involves community consultation and that the final version of the masterplan reflects community views. Para 17.10 (p696) *'…However, the level of this growth will be contingent on the delivery of strategic infrastructure necessary to support both new developments and existing neighbourhoods. This includes transport infrastructure and particularly the Bakerloo line extension…'* We do not accept that redevelopment of the area should be contingent on the Bakerloo Line extension proceeding, or even the relocation of Lower Sydenham Station to Bell Green, although we have no doubt that these would act as powerful catalysts for regeneration. We agree that the lack of access to public transport is a major contributor to local deprivation, and that sites required for critical transport infrastructure should be protected to allow future construction. The need to tackle poor amenity at Bell Green is urgent and early interventions to improve the neighbourhood, even if modest, should proceed as a priority in parallel with efforts to improve the transport infrastructure.	The Council acknowledges the strong local interest in a masterplan for the area and work undertaken by the community to support this. The Council will continue to take a lead role on the preparation of a masterplan to support the delivery of the Local Plan, working with and consulting a range of stakeholders including the local community and landowners. The Regulation 18 Local Plan document set out several spatial strategy options, recognising that some or all phases of the BLE may not be delivered in the plan period (including for reasons of funding). The preferred approach for the spatial strategy is therefore not dependent on the BLE. However the spatial strategy and the Local Plan policies aim to facilitate the delivery of the BLE, and provide flexibility to respond to it. This includes provision for an uplift in site development capacities enabled by the BLE through higher public transport access levels, particularly in the Bell Green and Lower Sydenham area – this is signposted in the plan but it is acknowledged this could be made clearer.	Local Plan amended to clarify Council's commitment to enabling the delivery of the BLE, whilst ensuring the plan is deliverable in the absence of the BLE.
	3	LSA	1) Could you inform me as to where I will be able to do my weekly food shop, not day to day shopping? I currently use Savacentre at Bell Green and Lidl on Southend lane. 2) Where will Sydenham Green Group Practice be resited?	The Local Plan proposals for Bell Green seek to enable the redevelopment the existing out of centre retail parks to deliver a new mixed-use neighbourhood. This will continue to allow for the provision of a significant amount of retail floorspace in the area, including new or re-purposed groceries or supermarkets. Elsewhere, existing district town centres and local centres will be supported for a range of main town centre uses. The site allocation for Sydenham Green Group Practice will enable the facility to be reprovided at the current site as part of a new mixed-use development. Any proposal for off-site reprovision would only be considered where other Local Plan policies on community infrastructure are satisfied.	No change.

Discourse Architecture	3	LSA LSA SA 01 LSA SA 02 LSA SA 03 LSA SA 04 LSA SA 05	***Lewisham's South Area*** *(p696)* ***Lewisham's South Area PART 3 – Site Allocations*** *(p699)* *Comments on Sites 1, 2, 3, 4 & 5 are given together:* *1 Former Bell Green Gas Holders* *2 Bell Green Retail Park* *3 Sainsbury's Bell Green* *4 Stanton Square Locally Significant Industrial Site* *5 Sydenham Green Group Practice* **Comment** We strongly agree that proposals for the above sites should be made within the context of a Council-led master plan informed by the framework of proposals initiated by Discourse Architecture and the Sydenham Society. We have engaged in initial consultation with the Council and 'We Made That' on their proposals for the site and will issue our formal comment on these under separate cover. Our own community consultation at public meetings organized by the Sydenham Society (Railway Tavern 06.03.19 & Livesey Memorial Hall 12.09.19) identified a number of key areas of concern to local people that are not adequately addressed in the draft Local Plan: • The need for immediate action to improve the services and amenity in the area. There is frustration that proposals planned for the very long term may never happen and an appetite for modestly scaled interventions in the short and medium term, for example, to improve pedestrian crossings, and reduce the dominance of roads and associated air pollution. Proposals for Bell Green should recognize and facilitate the probability of incremental development as sites become available at different times. • Poor bus connectivity, particularly east-west along Southend Lane is a major complaint. We therefore argue that provision of a bus station with potential future inter-modal connections to the station for rail or Bakerloo Line services should form an integral component of the site redevelopment. • Redevelopment should not result in the loss of the hub of conveniently located retail units. It should be made clear that densification and mixed-use redevelopment need not involve the loss of retail, but will allow the introduction of additional uses to the site	Support for master-plan led approach noted. The Council acknowledges the strong local interest in a masterplan for the area and work undertaken by the community to support this. The Council will continue to take a lead role on the preparation of a masterplan to support the delivery of the Local Plan, working with and consulting a range of stakeholders including the local community and landowners. Part 4 of the Local Plan deals with delivery and monitoring. Policy DM 3 (Masterplans and comprehensive development) and provides the strategic approach for phasing and delivery of large sites. The Council will continue to work with and lobby Transport for London to improve bus services throughout the Borough, and particularly where these are needed to support levels of growth planned. The Local Plan proposals for the redevelopment of the Bell Green are likely to result in a loss of an element of existing retail floorspace. This approach is supported by the latest Retail Impact Assessment and Town Centre Trends Study, which indicates a diminishing need for retail floorspace over the long term. However, the local plan is proposing a mixed-use redevelopment a new centre within Bell Green which will provide for retail as well as a wider mix of main town centre uses. The designation and safeguarding of Stanton Square as an LSIS is supported by the Council's Employment Land Study. The local plan seeks to enable the redevelopment of this site for a wider range of uses whilst ensuring no net loss of industrial capacity. This will complement the proposals for regeneration on other sites in this area, led by the masterplan. The Local Plan supports a transition to carbon neutrality. As part of this, the delivery of a decentralised energy network is identified in the South Area key spatial objectives. Its feasibility is demonstrated by the Council's latest Energy Masterplan. The Part 2 policies on Sustainable Design and Energy support this approach. Bell Green Retail Park and Sainsbury's Bell Green site allocations already incude a requirement for improved east-west links from/to Waterlink Way.	Bell Green Retail Park and Sainsburys Bell Green Site allocations amended to reference options for the provision of a new railway station

			We believe that the Local Plan brief for new development at Bell Green can be successfully achieved with a layout based on established urban precedents for street-based architecture. The urban model of towers and slabs with poorly characterized spaces between, that has been adopted at Deptford and Lewisham town centre, should be replaced by a more regulated approach that is focussed on creating a positive public realm and spaces between buildings**.** The enhancement of the Waterlink Way should be bolder and incorporate a new east-west branch connecting to Perry Hill. Para 17.30 • *Development must not result in a net loss of industrial capacity, or compromise the functional integrity of the employment location, in line with Policy EC 5 (Locally Significant Industrial Sites).* We support the retention of employment uses at Bell Green, but question whether the Stanton Square Locally Significant Industrial Site is an appropriate location for industrial activities, particularly the current low-intensity uses, which include a personal storage warehouse and a scaffold yard. We suggest that these activities will be a poor use of a site in close proximity to dense mixed uses and well-served by public transport. Instead, the employment emphasis at Bell Green could be related to retail, commercial, health, education, and hotel uses, combined with smaller-scale residential related uses, recognizing the emerging prevalence of live-work arrangements. An appropriate response to this economic trend would be to design residential units adapted to facilitate the growth in home working, whether remote office working or smaller home-based businesses. These could range from provision of rooms or spaces within residential units that could be used as home offices, to residential units with street access to integral retail or workshop accommodation. Finally, we would argue that the aspiration to build a sustainable future should be much bolder, making Bell Green a zero-carbon development.		
	3	LSA Key spatial objectives	The absence of certainty on lead times and delivery timetables highlight an observable over-reliance on delivery of Phase 2 within the DLLP which the Council must necessarily re-assess.	The Regulation 18 Local Plan document set out several spatial strategy options, recognising that some or all phases of the BLE may not be delivered in the plan period (including for reasons of funding). The preferred approach for the spatial strategy is therefore not dependent on the BLE. However the spatial strategy and the Local Plan policies aim to facilitate the delivery of the BLE, and provide flexibility to respond to it. This includes provision for an uplift in site development capacities enabled by the BLE through higher public transport access levels, particularly in the Bell Green and Lower Sydenham	Local Plan amended to clarify Council's commitment to enabling the delivery of the BLE, whilst ensuring the plan is deliverable in the absence of the BLE.

				area – this is signposted in the plan but it is acknowledged this could be made clearer.	
	3	LSA Key spatial objectives	As an example, to set Objective 1 as the highest priority could be viewed as an unnecessary constraint on delivery of other objectives and factors that would deliver better results on the short and medium term for Bell Green.	The key spatial objectives are listed by number but this is not a reflection of their priority.	Local Plan amended to make clear that the key spatial objectives for thes sub-areas are not listed in order of priority
	3	LSA Key spatial objectives	An example of an unnecessary deferral would be the delivery of a widened and heightened bridge with improvements to pedestrian safety measures on Southend Lane. To defer those works because it has insufficient priority or it may have a design conflict with any new or relocated station on Southend Lane could not be deemed acceptable by a body of Ward residents who have waited for bridge improvement works to be delivered for 25+ years. A contribution of s106 monies that the Council has now acknowledged in writing is unspent and is being held in the Council's account would beneficially assist in direct negotiations with Network Rail over the contributory costs of renewing the bridge. The final value of these s106 monies has not been yet established by the Council, after a further year-plus delay because of the pandemic. Last correspondence confirmed it was in the order of £2.4m.	The council recognises the potential need for the widening and increase in height at Southend Lane bridge. Whilst high level feasibility studies have been prepared in the past no detailed design work has been undertaken. The Council will work with Network Rail to explore options. This is likely to come forward as part of the BLE and/or the comprehensive redevelopment of Lower Sydenham and Bell Green.	Local Plan amended to include reference to Southend Lane bridge in the LSA1 place principles.
	3	LSA Key spatial objectives	The Council is invited to acknowledge that a thorough re-examination of priorities, across short, medium and long term objectives will constitute a major confidence building exercise for a community in a geographic location where progress is observably minimal.	Noted. The Local Plan covers a 20-year period. Where possible the plan sets out indicative timeframes for the delivery of key development sites (i.e. site allocations). The Infrastructure Delivery Plan which sits alongside the Local Plan includes details on the timeframes for the delivery of infrastructure and projects which will support the plan's delivery.	No change.
	3	LSA Key spatial objectives	Engagement by the community in consultations leading to development of a Master Plan requires a restoration of confidence in that same community that their efforts and contributions are valued.	Noted. The Local Plan is being prepared in accordance with the Council's adopted Statement of Community Involvement. The Council has and will continue to engage with the local community and community groups on planning matters, including any Council-led masterplans.	No change.
	3	LSA Key spatial objectives	The arrival of BLE would improve transport accessibility and thereby enhance the attractiveness of development in the area. Plans, though, for options that include relocation or addition of a station closer to Bell Green is far from providing certainty in terms its deliverability. At the point in the timeframe for the DLLP consultation, funding for BLE Phase 1 has just been approved. Firm delivery timetables for Phase 1 remain uncertain. Approvals in principle for Phase 2 are not secure nor is funding and thereby deliverability for Phase 2 cannot be forecast with any level of confidence beyond the 50% range.	Noted. The Council acknowledges that whilst the BLE has been included in the London Plan as a key transport project, funding to secure its delivery has not yet been secured. The Regulation 18 Local Plan document set out several spatial strategy options, recognising that some or all phases of the BLE may not be delivered in the plan period (including for reasons of funding). The preferred approach for the spatial strategy is therefore not dependent on the BLE. However the spatial strategy and the Local Plan policies aim to facilitate the delivery of the BLE, and provide flexibility to respond to it.	No change.
Lewisham Cyclists	3	LSA Key spatial objectives	Page 676 Key Spatial Objective 6 in the main document refers to "Transform the Ringway corridor (Southend Lane and Whitefoot Lane) and the A21 corridor (Bromley Road) into 'healthy streets'". We would suggest the wording of this is altered to "adopt the healthy streets approach along the Ringway corridor (Southend Lane and Whitefoot Lane) and the A21 corridor (Bromley Road)" and encourage the planning team to follow TfL guidance on this which is clear and unequivocal. This should also form part of the strategic	Noted. The draft Local Plan is clear that the Healthy Streets approach will be applied in line with the London Plan. Further details are set out in Part 2 Transport and Connectivity policies.	Local Plan amended to clarify objectives for transforming strategic corridors using the Healthy Streets Approach (rather than transforming corridors into Healthy Streets).

			planning document for the whole corridor, and form conditions of planning along the corridor, including CIL contributions to part fund improvements.		
Sydenham Society	3	LSA Key spatial objectives	**Key Spatial Objectives** (p678) **Comment:** These are supported	Support noted.	No change.
Discourse Architecture	3	LSA Key spatial objectives	Discourse Architecture prepared the 'Bell Green Urban Renewal' masterplan for Bell Green/Lower Sydenham in consultation with the Sydenham Society in 2019 17 LEWISHAM'S SOUTH AREA (p673) Key Spatial Objectives (p678) Comment: These are supported	Support noted.	No change.
London Wildlife Trust	3	LSA 01	We support these principles, especially in respect of Parts K and L.	Support noted.	No change.
Lewisham Cyclists	3	LSA 01	Lewisham Cyclists also believe Downham way should also provide additional protected cycle lanes to connect the Downham Estate, and area with lower PTAL, to both Local Centres in Grove Park as well as A21 Bromley Road and Beckenham Place Park. This should be included in LSA1 sections G and I.	Noted	Local Plan amended by referencing cycle lanes within site allocations
Sydenham Society	3	LSA 01	**LSA1 South Area Place Principles** (p681) **Comment:** These are supported **Item M** (p683) Transport infrastructure improvements: Provision of a new bus station, with intermodal connections to the train or Bakerloo Line, should be added as item c. to a. Bakerloo Line Extension, and b. Junction improvements	Support noted.	Site allocations amended to reference potential requirement for new station.
Discourse Architecture	3	LSA 01	LSA1 South Area Place Principles (p681) Comment: These are supported	Support noted.	No change.
	3	LSA 02	The content of Lewisham Local Plan's content relating to the public realm is welcome. It is felt essential that the bridge at Southend Lane is rebuilt with a design that both widens it and permits the doubling of the width of the carriageway and increase its height to permit the flow and use of double-deck buses along Southend Lane and provides safe footpaths on both sides of the roadway. It is considered pivotal and necessary to improve traffic flow and pedestrian safety measure combined with an opportunity to improve the sense of arrival to the area. The walking and cycle environment can be compromised along with the necessary passing widths for wheelchairs and prams in case of poor placement of street furniture such as electric vehicle charging infrastructure.	The council recognises the potential need for the widening and increase in height at Southend Lane bridge. Whilst high level feasibility studies have been prepared in the past no detailed design work has been undertaken. The Council will work with Network Rail to explore options. This is likely to come forward as part of the BLE and/or the comprehensive redevelopment of Lower Sydenham and Bell Green.	Site allocation amended to include reference to Southend Lane bridge.

			In keeping with the LPA's Good Public Space Design principles, measures to ensure that public footpaths and cycleways in the area are improved upon, particularly with the introduction of good quality design for peninsula bays for charging points that avoid the placement of charging points on footpaths, are welcome. Similarly, consideration should be given to improvements of the layout and configuration of all pedestrian crossings in the Bell Green retail area.		
Grove Park Neighbourhood Forum	3	LSA 02	This policy doesn't elaborate on the Grove Park neighbourhood part, therefore even more reason to ensure that policy LEA3 – Strategic Area for Regeneration, Grove Park, is further elaborated, taking elements from the neighbourhood plan.	Policy LEA3 (Strategic Area for Regeneration, Grove Park) cross-references Policy LSA2. This is considered an appropriate response to capturing the policy which covers parts of two of the plan's 'character areas'.	No change.
Sydenham Society	3	LSA 02	**LSA2 Strategic Area for Redevelopment** (p685) Item C Transport infrastructure: add bus station with intermodal connections to rail or tube lines	Noted	Former Bell Green Gas Holders and Livesey Memorial Hall, Bell Green Retail Park and Sainsbury's Bell Green site allocations amended to reference increased bus services and/or potential requirement for new station.
Discourse Architecture	3	LSA 02	Item M (p683) Transport infrastructure improvements: Provision of a new bus station, with intermodal connections to the train or Bakerloo Line, should be added as item c. to a. Bakerloo Line Extension, and b. Junction improvements LSA2 Strategic Area for Redevelopment (p685) Item C Transport infrastructure: add bus station with internodal connections to rail or tube lines	Noted	Former Bell Green Gas Holders and Livesey Memorial Hall, Bell Green Retail Park and Sainsbury's Bell Green sSite allocations amended to reference increased bus services and/or potential requirement for new station.
Transport for London	3	LSA 02	LSA3 Bell Green and Lower Sydenham 2 Bell Green Retail Park 3 Sainsbury's Bell Green The policy states in part C that land will be safeguarded for the BLE to Hayes. However, it should make clear that this is not part of the formal safeguarding for the BLE. It is also unclear what safeguarding will entail for this site/area as the BLE option beyond Lewisham to Hayes and Beckenham Junction is only in the early design phase. TfL welcomes further dialogue on the matter so the local plan can provide greater clarity in future editions, and can be prepared with the consideration of infrastructure requirements.	Noted.	Local Plan amended as suggested, to provide clarity on safeguarding and route options for BLE.
London Wildlife Trust	3	LSA 03	We support this policy in respect of Part D)e.	Support noted.	No change.
	3	LSA 03	There could feasibly be an opportunity to extend the Linear Park into one or both of the larger development sites, and it is recommended that this option is explored, with a view to an overall biodiversity net gain, as	Noted. Bell Green Retail Park – noted.	Pool Court site allocation amended by referring to biodiversity.

			measured/calculated at an appropriate functional scale. Extending the Linear Park would also be in line with open space objectives, noting the key finding of the Lewisham Open Spaces Assessment (2019), which is that a significant amount of additional provision will be required to maintain standards (of access to open space) over the long-term. However, it is recognised that there is a need to balance wide ranging objectives when considering how best to redevelop these sites. I support the expansion of the Linear Park. Site specific policy currently states: • Bell Green Retail Park – "Development proposals must protect and seek to enhance green infrastructure, including SINC, green corridor, Metropolitan Open Land and the Pool River." • Wickes and Halfords, Catford Road – "Development should maximise opportunities to enhance the ecological quality and amenity provided by the River Ravensbourne, including by revealing the river through decluverting, repairing gaps in Waterlink Way and improving public access to it." This site specific policy is broadly in accordance with the Site Specific Design and Development Guidelines set for Wickes and Halfords, Catford Road within the adopted River Corridor Improvement Plan SPD (2015). Figure 9.1 shows one of the figures from the SPD, showing the location of the Pool River Linear Park between BGLS and Catford, also highlighting proximity of Beckenham Palace Park. • Pool Court – the site specific policy does not reference biodiversity constraints or opportunities; however, it explains: "Applicants should consult with Network Rail and Transport for London on design and development options." I would like to see the biodiversity and green space commitments explicitly included in this Local Plan and at the sites mentioned above. In Bell Green, a community masterplanning approach should be undertaken and the proposals as they stand are unacceptable. The heritage assets of the Livesey Hall, War Memorial and Grounds needs to be fully recognised in any plan for Bell Green.	Wickes and Halfords – The site allocation policy has been informed by the River Corridor Improvement Plan, which development proposals will also need to have regard to. Pool Court – Agreed, an additional policy point on biodiversity will be included. The Council acknowledges the strong local interest in a masterplan for the area and work undertaken by the community to support this. The Council will continue to take a lead role on the preparation of a masterplan to support the delivery of the Local Plan, working with and consulting a range of stakeholders including the local community and landowners. The Local Plan addresses the importance of preserving and enhancing the heritage significance of Livesey Hall, Memorial and Grounds, This includes Policy LSA3 and the Bell Green Gasholders site allocation. Bell Green Retail Park and Sainsbury's Bell Green site allocations already incude a requirement for improved east-west links from/to Waterlink Way.	
	3	LSA 03	A significant opportunity to improve visual enhancement for the Public Realm. Approaches to the Bell Green locus from three major road arteries will benefit from improvements.	Noted. The Local Plan and South Area site allocations broadly seek to improve the public realm in this area in accordance with the Healthy Streets approach and principles.	No change.
	3	LSA 03	Augment transport links for Bell Green and improve connections to town centres and nearby railway stations and include enhancement to cycle and pedestrian walking routes.	Noted. The Local Plan and South Area site allocations broadly seek to improve the public realm and transport access in this area in accordance with the Healthy Streets approach and principles. It also seeks to capitalise on the opportunities presented by the Bakerloo line extension.	No change.

	3	LSA 03	Radical redesign of the entire road system, in an area that extends to and embraces Perry Hill's junction with Selworthy Road, Perry Rise to its junction with Adamsrill Road, the entire Bell Green gyratory system, Southend Lane to its junction with Moremead Road and Sydenham Road. The design principles must be rooted in public consultation and must seek, as a primary issue to minimalize air pollution by reducing the frequency of stopping points in the flow of traffic round and through the entire system. It could be calculated that timeframes for the delivery of such a comprehensive proposal will be concomitant with the delivery of outcomes from nationally-led policies which deliver significant reduction in the use of polluting vehicles in all classes. That might be characterised as a win-win outcome.	LSA03 C.d does include reference to improving the existing network.	Policy amended to strengthen the need to significant improve the street network.
	3	LSA 03	Radically redesign the existing rail bridge at Southend Lane and enhance it with the provision of integrated pedestrian safety measures with the provision of safe footpaths on both sides of the roadway. The bridge should be rebuilt with a design that both widens it and permits, as a minimum, the doubling of the width of the carriageway and increase its height thus improving the management of traffic flows and of access of double-deck buses on Southend Lane.	LSA03 C.d does include reference to improving the existing network.	Policy amended to strengthen the need to significant improve the street network.
	3	LSA 03	Create dedicated parking to the rear of Livesey Memorial Hall for the use of patrons. In normal times regular and large attendance events such as funerals, weddings and other celebratory events are hosted there and local on-street parking for residents is overwhelmed on those occasions by patrons seeking parking space.	Parking provision will need to be carefully managed in line with the London Plan standards. Any such new provision will need to ensure there is no harm to the significance of these heritage assets. This will need to be considered through the development management process.	No change.
	3	LSA 03	Introduce the opportunity to sensitively provide an appropriate density of new housing units. It may be deemed appropriate to consider provision similar in scale to Bell Green Phase III development.	The Local Plan Part 2 policies broadly support the sensitive intensification of sites, and set detailed requirements to ensure that development proposals achieve the optimal capacity of a site.	No change.
	3	LSA 03	Reprovision and expand all necessary local services within new developments in the area that will serve the increased number of residents. Health centre care, dental care, schools and nursery provision and other social care needs must be addressed.	An Infrastructure Delivery Plan has been prepared alongside the Local Plan. This identifies the strategic infrastructure required to support the levels of growth planned in the Borough, and has informed the Local Plan policies. The Local Plan Part 2 policies also set requirements to for infrastructure provision which will be considered on a case-by-case basis.	No change.
	3	LSA 03	Introduce appropriate volumes of retail and commercial floor space.	The Local Plan seeks to makes provision for an appropriate amount of retail and commercial floorspace, informed by the latest technical evidence. Employment land and retail studies have been commissioned and prepared to inform the preparation of the Local Plan. The site allocation policies set out indicative capacities for different types of land uses.	No change.
	3	LSA 03	Introduce a policy for all car parks requiring conformance with ACPO and Home Office Scientific Development Branch standards to introduce secure car park status with good quality design, improved lighting, controlled access and CCTV coverage.	Noted. It is acknowledged that the Local Plan can provide further clarity and detail on the standards and design of car parking. For soundness, this will need to be in accordance with the London Plan.	Local Plan policy TR4 amended to better refer to and align with London Plan car parking standards.
	3	LSA 03	Introduce a policy to install rapid-charge points for EVs around this area and in publicly owned car parks.	The draft Local Plan Part 2 policy on Parking includes requirements for charging points and electric vehicles.	Local Plan policy TR4 amended to better refer to and align with London Plan car parking standards.

				The Council has also prepared a Low Emission Vehicle Charging Strategy which will address provision that is not included within new development proposals.	
	3	LSA 03	Expand the defined *Area 1 Former Bell Green Gas Holders* to add the entirety of The Livesey Memorial Hall, its grounds, former bowling green and former tennis court. The listed status of three elements, Livesey Hall War Memorial Grade II, Livesey Memorial Hall Grade II and Livesey Memorial Hall Boundary Wall Grade II on that expanded site is fully recognised. The Council is invited to accept that the non-listed areas can be sensitively reprovisioned, with or without Designation as Local Green Space, in a variety of combinations to enhance the Public Realm aspects and provide areas that can be of beneficial use to residents and visitors without compromise to the listed elements.	The draft Local Plan addresses the importance of preserving and enhancing the heritage significance of Livesey Hall, Memorial and Grounds, This includes Policy LSA3 and the Bell Green Gasholders site allocation. However it is acknowledged that this could be reinforced by ensuring these assets are considered more coherently by amending the site allocation.	Former Bell Green Gas Holders site allocation boundary amended to include the Livesey Memorial Hall and its grounds, former bowling green and former tennis court.
	3	LSA 03	The assertion at LSA.4 has this, "The Bell Green neighbourhood is known for its out-of-centre retail park, including a superstore and other large format outlets, as well as their associated surface car parking. These retail uses are adjoined by two former gas holders, which are prominent local landmarks. Some contemporary blocks of flats have been developed on the edge of these Bell Green sites however new development has generally been delivered in a piecemeal way. This creates an unfortunate and unnecessarily outdated view of the heritage of Bell Green. It adds further to the sense of inconsistency about the presence of the gas holders and lack of precision in the content of the DLLP for this area.	Noted.	Local Plan paragraph 17.4 amended to more accurately reflect on existing character of area.
	3	LSA 03	The gas-holders were demolished and the site levelled in 2020.	Noted.	Local Plan amended to make clear gas-holders have been dismantled.
	3	LSA 03	Vision and Character commentaries are positive although there is an air of over optimism on matters where the LPA had little control on delivery of objectives.	Noted. This is a vision for the area which the Local Plan policies aim to support.	No change.
Sydenham Society	3	LSA 03	**LSA3 Bell Green and Lower Sydenham** (p687) This is supported **Item B** The preparation of a Supplementary Planning Document and/or Masterplan by the Council is supported, provided that the development of the masterplan involves community consultation and that the final version of the masterplan reflects community views. Para 17.10 (p696) *'…However, the level of this growth will be contingent on the delivery of strategic infrastructure necessary to support both new developments and existing neighbourhoods. This includes transport infrastructure and particularly the Bakerloo Line Extension…'* We do not accept that redevelopment of the area should be contingent on the Bakerloo Line Extension proceeding,	Support for LSA3 noted. The Council acknowledges the strong local interest in a masterplan for the area and work undertaken by the community to support this. The Council will continue to take a lead role on the preparation of a masterplan to support the delivery of the Local Plan, working with and consulting a range of stakeholders including the local community and landowners. The Regulation 18 Local Plan document set out several spatial strategy options, recognising that some or all phases of the BLE may not be delivered in the plan period (including for reasons of funding). The preferred approach for the spatial strategy is therefore not dependent on the BLE. However the spatial strategy and the Local Plan policies aim to facilitate the delivery of the BLE, and provide flexibility to respond to it. This includes provision for an uplift in site development capacities enabled by	Local Plan amended to clarify Council's commitment to enabling the delivery of the BLE, whilst ensuring the plan is deliverable in the absence of the BLE.

			or even the relocation of Lower Sydenham Station to Bell Green, although we have no doubt that these would act as powerful catalysts for regeneration. We agree that the lack of access to public transport is a major contributor to local deprivation, and that sites required for critical transport infrastructure should be protected to allow future construction. The need to tackle poor amenity at Bell Green is urgent and early interventions to improve the neighbourhood, even if modest, should proceed as a priority in parallel with efforts to improve the transport infrastructure.	the BLE through higher public transport access levels, particularly in the Bell Green and Lower Sydenham area – this is signposted in the plan but it is acknowledged this could be made clearer.	
Discourse Architecture	3	LSA 03	LSA3 Bell Green and Lower Sydenham (p687) This is supported	Support noted.	No change.
Lewisham Cyclists	3	LSA SA 01	**Former Bell Green Gas Holders & Bell Green Retail Park;** In order for the council to meet policy TR3 in the South area, Development requirements (17.19 & 17.22) should explicitly take into account plans for strategic cycle routes identified in the Council Transport Strategy running East-West through Bell Green Gyratory as integral to adopting the Healthy Streets approach as part of the public realm strategy and should follow London Cycle Design Standards.	The site allocations mention the need for 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.	No change.
	3	LSA SA 01	The first instance of significant error appears here and is replicated in both the location diagram and in the narrative. The former gas-holders are located on Alan Pegg Place not Bell Green Lane. At para 17.18 Development requirements, reference is made thus "Development must be delivered in accordance with a master plan for the Bell Green and Lower Sydenham area." Which master plan? There is no definition present – draft, existing, or proposed. Reference is also made to "Positive frontage on Bell Green Lane and other key routes". How is the author's intent to be interpreted from this statement and the mis-labelled associated diagram? Bell Green Lane is some distance away from this locus. It is within the bounds of this site that off-street car parking for patrons of the Livesey Hall should be optimally provided. An expansion to this area is proposed at **Appendix A.**	Noted. The masterplan referred is one that is endorsed by the Council and which the community has been engaged with and consulted on. The Council will continue to take a lead role on the preparation of a masterplan to support the delivery of the Local Plan, working with and consulting a range of stakeholders including the local community and landowners. Any proposal for the provision of additional car parking will be dealt with through the development management process.	Former Bell Green Gas Holders and Livesey Hall site allocation amended to accurately refer to the site location at Alan Pegg Place Former Bell Green Gas Holders site allocation boundary amended to including the Livesey Memorial Hall and its grounds, former bowling green and former tennis court.
	3	LSA SA 01	*The listed status of three elements, **Livesey Hall War Memorial Grade II, Livesey Memorial Hall Grade II and Livesey Memorial Hall Boundary Wall Grade II** on the expanded site is fully recognised. The Council is invited to accept that the non-listed areas can be sensitively reprovisioned, with or without Designation as Local Green Space, in a variety of combinations to enhance the Public Realm aspects and provide areas that can be of beneficial use to residents and visitors without compromise to the listed elements.*	Noted.	Former Bell Green Gas Holders site allocation boundary amended to including the Livesey Memorial Hall and its grounds, former bowling green and former tennis court. Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended emphasise public realm and amenity.
Southern Gas Networks	3	LSA SA 02	Southern Gas Networks (SGN) have infrastructure within the area outlined in red • A 400mm PE Medium gas main & 30" Steel Medium pressure gas main. And	Noted.	Bell Green Retail Park site allocation amended to reference existing gas infrastructure and working with utilities providers

			• 180mm PE Low pressure gas main If any/when planning application is submitted SGN, would have to object due to our strategic gas mains being in situ with in the red boundary. As a side note the retail units within the retail park have gas supplies the owner of that gas infrastructure is Fulcrum Pipelines Ltd (their ref 9010973) they would need to be notified as well.		
	3	LSA SA 02	This diagram contains another incidence of street naming error. Mis-labelled previously as Bell Green Lane in this diagram it has been labelled Southend Lane. Once more the road name should be Alan Pegg Place. The narrative contains statements that display the LPA's over-reliance on potential delivery of BLE Phase II.	Noted. As set out elsewhere in the consultation statement, the delivery of the Local Plan and proposals for Bell Green and Lower Sydenham are not contingent on the delivery of the BLE.	Diagram amended as suggested.
Lewisham Cyclists	3	LSA SA 03	**Sainsbury's Bell Green;** In order for the council to meet policy TR3 in the South area, Development requirements (17.26) should explicitly take into account plans for strategic cycle routes identified in the Council Transport Strategy running East-West through Bell Green Gyratory as integral to adopting the Healthy Streets approach as part of the public realm strategy and should follow London Cycle Design Standards.	The site allocations mention the need for 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.	No change.
	3	LSA SA 03	This diagram contains another incidence of street naming error. Mis-labelled previously as Bell Green Lane in this diagram it has been labelled Southend Lane. Once more the road name should be Alan Pegg Place. The narrative contains statements that display the LPA's over-reliance on potential delivery of BLE Phase II.	Noted. As set out elsewhere in the Consultation Statement, the delivery of the Local Plan and proposals for Bell Green and Lower Sydenham are not contingent on the delivery of the BLE.	Diagram amended as suggested.
	3	LSA SA 04	For the first time in this group, the diagram contains no street naming errors. Apart from the narrative containing the usual statements that display the LPA's over-reliance on potential delivery of BLE Phase II, the contents are supported.	Noted. As set out elsewhere in the Consultation Statement, the delivery of the Local Plan and proposals for Bell Green and Lower Sydenham are not contingent on the delivery of the BLE.	No change.
on behalf of Sydenham Scheme LLP the owners of the Coventry Scaffold	3	LSA SA 04	The Stanton Square site allocation is welcome in principle. In line with the comments above regarding the masterplan this is referenced again as part of this site allocation and it should be recognised that delivery will be on a phased basis given the multiple ownership and availability of sites. As long as this is promoted in the context of an illustrative masterplan then this would achieve the comprehensive and coordinated development sought by the policy. It is noted that the development capacity is identified as 'indicative' but the range of residential units is very low for a regeneration site such as this and further engagement is sought to understand how this was arrived at with a view to increase these figures.	Noted. Where no advanced pre-application discussions have taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need to provide co-location of uses, the ameniy of the school opposite the site and the non designated heritage assets. ~~-~~Based on these considerations, the land use mix and residential units have remained the same. Optimal capacity for the site will be established at planning application stage through a design led approach.	Stanton Square LSIS site allocation amended to refer to partnership working, phasing, masterplans and Policy DM3.

	3	LSA SA 05	Another incidence of street name error. The street name here is Bell Green - NOT Bell Green Lane. As in previous examples the narrative for this site allocation is rendered meaningless in terms of lack of clarity, leading to difficulty and improbable interpretation and plain error. LSA.34 Development requirements propose that "Positive frontages and improved public realm along Bell Green Lane, Holmshaw Close and Kirtley Road. The locations proposed are unfeasible. The proposal that "Appropriate re-provision of the existing health care facility, in line with Policy CI 1 (Safeguarding and securing community infrastructure) is supported. Please note the response made earlier that re-provisioning must address increases in the number of patients that the Health centre will be obliged to serve as a result of increased housing provision in the area. LSA.35 Development guidelines propose that "Consideration should be given to the introduction of a new walking route connecting Kirtley Road and Bell Green Lane." What is the author's intent here – to actually have a walking route to connect Kirtley Road to Bell Green as opposed to a more improbable and less than feasible connection to the real Bell Green Lane?	Error noted. Disagree that the development guidelines are unfeasible. Support regarding reprovision of health care facility noted. The site allocation does not specify that a walking route connecting Kirtley Road and Bell Green will be delivered, but instead states that consideration should be given to this new route.	Sydenham Green Group Practice site allocation map amended to show correct road name.
Lewisham Cyclists	3	LSA SA 06	**Worsley Bridge Road Locally Significant Industrial Site;** The development requirements fail to recognise the council transport strategy to deliver Cycleways running from Lower Sydenham to Bromley. The development requirements should include making sure any development does not result in a reduction in existing footway or carriageway space. This should be detailed in the development requirements as part of the public realm strategy and should follow London Cycle Design Standards.	Noted	Worsley Bridge Road LSIS site allocation amended to include reference to delivery of cycleways running from Lower Sydenham to Bromley.
	3	LSA SA 06	The narrative contains statements that display the LPA's over-reliance on potential delivery of BLE Phase II. Otherwise, the proposals are supported.	Support noted. As set out elsewhere in the Consultation Statement, the delivery of the Local Plan and proposals for Bell Green and Lower Sydenham are not contingent on the delivery of the BLE.	No change.
Historic England	3	LSA SA 08	Site allocation 8 South Area (Excalibur Estate): Please note that the buildings referred to at para 17.48 are listed Grade II on the National Heritage List for England, rather than being locally listed as drafted.	Noted.	Excalibur Estate site allocation amended to accurately reflect status of listed buildings, as suggested.
	3	LSA SA 11	I am writing to express concern about the plans contained within Lewisham's new Local Plan to develop the Co-op at 431-453 Downham Way. While I understand the need to build more housing and would generally support it, I do not support any development that would see the Co-op being demolished/ closed for a period of time. A lot of people in the area (including old and vulnerable people) depend on the Co-op for grocery shopping. It is very important for the community and getting rid of it would severely undermine the goal of the 15 minute	Noted. The site allocation provides for a mixed-use development which would allow for the re-provision of a retail unit at the ground floor level. Should any future development come forward in line with the site allocation policy, the closure or temporary re-location of the existing grocery store would be dealt with through the Development Management process.	No change.

			neighbourhood, which I know is at the heart of the Local Plan. Even if the plan is to include a food shop at the bottom of the block of flats once the development is finished, this would still entail the local area being without a decent grocery shop for, I imagine, a year. This would have a big impact on everyone in the area, especially older adults and those who do not drive. I would agree that the car park for the Co-op is too big and is not an efficient use of space. I would fully support a plan to make the car park smaller and to use that space for housing. However, I cannot support the current plan which would see the local area without a food shop for some time.		
	3	LSA SA 12	Building proposal on WV GarageSite (Avondale Road): My husband and I moved to Avondale Road in 2018 when we purchased our first house for our young family. While we are very happy to be living here, we have a number of issues with the surrounding area which we believe the housing development proposal may impact upon. The first relates to the speeding traffic on Avondale Road coming from both ends of the street. Just the other day we experienced an Audi travelling at what we believed to be around 60mph or more on a residential street. While this is shocking and rather frightening to witness, it is sadly common. The second issue concerns the number of parked vehicles on the street and surrounding our house which is on the corner with Alexandra Crescent from the Beadles garage (legally, I realise). While the thought of the garage no longer being able to park cars in front and at the side of our house (sometimes for months at a time!), we are concerned that another built-up residential area would increase the number of cars parked along the street as well as cars using the street as a speeding area. I completely understand the housing shortage problem which you will be seeking to rectify but I urge you to take these concerns into consideration when looking at the ambition of this project and the impact it could have on those of us who have recently made it our home.	Noted. The amount of car parking provision on any future redevelopment of the site would be considered having regard to the nature and scale of development, and in line with the parking standards set out in Part 2 of the Local Plan on Transport and Connectivity. In general, the Local Plan seeks to limit the amount of car parking to encourage a shift to more sustainable travel modes such as walking, cycling and public transport. Off-street parking management is dealt with by the Council's Transport service, and Controlled Parking Zones may be implemented where appropriate.	No change.
	3	LSA SA 12	Beadles garage site - draft Local Plan 1. My wife and I are residents of Avondale Road, Bromley. 2 May I comment on your proposals for Beadles Garage. This submission is split into two headings: A The context - the Beadles site as it is now; B The future which is envisaged by Lewisham Council Please could you acknowledge safe receipt?	Noted. It is considered that there is scope for the sensitive intensification of this site, which the Local Plan supports in order to help meet local needs for housing and commercial floorspace. Where no advanced pre-application discussions have taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This	Beadles Garages site allocation amended to make reference to the A21 Healthy Streets corridor, to increase residential to 25 units and to increase employment/ main towncentre floorspace to 610m^2.

			3. We do not object to the general principle underlying your proposals. But we do consider that your planning department needs significantly to adjust the scale of ambition involved in respect of the Beadles site. We believe that both Bromley Council and the Highway Authority for the A21, Transport for London, need to be fully engaged. Part A The context - the Beadles site as it is now 4 The Beadles site is, as you describe, at the junction of Avondale Road and Bromley Hill. 5 Bromley Hill is a busy A road and a red route. There is already a serious speeding problem on the A21. There are speed cameras which seek to regulate traffic speed in the immediate vicinity of the Beadles site which is the subject of the draft local plan. There has been at least one death at this junction. 6 The speed of motor vehicles on the A21 tempts drivers to take risks as they turn into the A21 from Avondale Road or from the Bromley Court Hotel slip road opposite. As recently as two months ago, there was a damage only, but significant, collision at the junction. 7 Your planners may not realise that Avondale Road is itself dangerous, because it is a “rat run” for traffic from Bromley Hill to Burnt Ash Lane, just as Park Avenue is. Moreover, the western end of Avondale Road, where Beadles is situated, is a main artery for traffic going towards the Downham Estate. The police have been alerted and are monitoring the situation. 8 With the closure of another VW site locally, Beadles has itself created a new traffic problem on Avondale Road. We are VW owners and have bought two new cars from them in the last six years. So we are not hostile to the garage - far from it. 9 The staff at the garage park Beadles cars, as they are entitled to do, along Avondale Road. The risks from speeding traffic in Avondale Road have already been flagged. The risks are now exacerbated by the many extra cars which are parked along the road. 10 In summary, the combination of speed and heavy parking at the western end of the road, create a dual risk for residents. Part B The future envisaged by Lewisham Council 11 We recognise that, with a housing shortage in the London area, the Council will rightly want to increase housing availability.	has taken into account the complexities of the site – including the need to provide mixed use development by introducing residential units and to reflect the surrounding character of the site. The indicative capacity has also been tested through the A21 Development Framework that has been endorsed by the council. -Based on these considerations, the land use mix and residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. The Council has consulted statutory consultees on the Local Plan proposals, including Greater London Authority / Transport for London, Metropolitan Police Service and Bromley Council. Their feedback will be used to inform the Regulation 19 stage document. Speed limits are outside the scope of the Local Plan. However, the plan does advocate for Healthy Streets principles in support of sustainable travel, to reduce vehicular dominance and improve safety. The draft Local Plan proposes to apply the Healthy Streets principles to the A21 Corridor, and elsewhere, whilst also promoting growth and new development within and around it. The London Plan should be referred for further information on the Healthy Streets approach and principles. There are a wide range of interventions and projects that could support Healthy Streets, and as a strategic document the Local Plan does not go into a great level of detail on these. The Council’s Local Implementation Plan (LIP) supports the London Mayor’s Transport Strategy, and further details can be found therein. Bromley Hill cemetery – the draft Local Plan seeks to protect existing cemeteries. The Council has prepared a Parks and Open Spaces strategy which sets out priorities for managing and enhancing open spaces. Transport Assessments are required alongside any major planning application so there is no need to specify this requirement in individual site allocations.	

			12 We also recognise that provision of employment floor space is a desirable objective. 13 We think that "public realm enhancements"would improve the A21 corridor from Downham to the junction with Avondale Road. But we do consider that the local plan will need to be more specific since it is impossible for local residents to understand what is proposed, not least in the light of the rather woolly and opaque language that has been used. 14 As for the cemetery on Bromley Hill, it would improve local amenity if the Council were to create the conditions in which the site's historic and environmental importance could be enhanced. But, again, what does the Council have in mind? 15 As for the Beadles site, the proposals are not suitable. They will, as presently envisaged, create additional risks to local residents. Why do we argue that there will be additional risks? The answer is that they are likely, unless the proposals for employment space and 22 residential units are scaled back, to increase road use disproportionately on Avondale Road itself. This is likely to result in the attendant risk of more speeding, both on Avondale Road and down Alexandra Crescent towards Downham. 16 Moreover, without the imposition of safety measures in the Local Plan in respect of the junction of Avondale Road and Bromley Hill, the proposals will create additional danger at the junction by reason of the probable level of increased usage. 17 It would not be impossible to impose suitable conditions to manage both sets of risks. But the Council should not proceed to finalise the Local Plan without a plan to address the risks. 18 In a spirit of collaboration, please let us know whether we can help you.		
	3	LSA SA 12	**Lewisham's ('the Council') New Local Plan ('Plan') – Proposed Site Beadles Garage ('the Re-development or Site')** My comments are made in a personal capacity. Thank you for providing residents with the opportunity to contribute to the Plan. I agree entirely with the Plan's intention to ensure that planning decisions are made in the best interests of neighbourhoods and communities. We operate an Avondale Road group, primarily for Neighbourhood Watch purposes, that is well represented by the residents and major concern has been expressed by many of us around the proposed Re-development. Whilst acknowledging that the Re-development presents a number of opportunities for Lewisham Council, not least	Noted. It is considered that there is scope for the sensitive intensification of this site, which the Local Plan supports in order to help meet local needs for housing and commercial floorspace. Where no advanced pre-application discussions have taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need to provide mixed use development by introducing residential units and to reflect the surrounding character of the site. The indicative capacity has also been tested through the A21	Beadles Garages site allocation amended to make reference to the A21 Healthy Streets corridor, to increase residential to 25 units and to increase employment/ main town centre floorspace to 610m^2.

			new residential units, based on the existing 'Site Allocation' I have a number of concerns which primarily centre on: A) The likely greater danger at the junction (A21/Avondale Road) itself, where there have been a number of accidents over the years (most recently on the 28 February); B) The likely increase in on-street parking , especially towards the western end of Avondale Road (and which is already used by Beadle's as an effective 'overspill car park'); C) The likely increase in traffic on Avondale Road, possibly resulting in more cars exceeding the speed limit and creating additional danger (our road is already a recognised – by the Authorities -speeding 'hotspot') The current Council Notice states that its 'Site Allocation' expectations are that the Re-development will be for mixed use. It would be helpful if local residents (of both Lewisham and Bromley) could be notified as soon as possible as to the intended actual use of the Site. Whatever the Site's eventual use, parking and traffic considerations must be addressed and improve on the existing situation. It would be helpful to know if the Metropolitan Police and highway authority for the A21 (as a red route and an A road, TfL is the authority) have been approached for their input and, if so, what their feedback has been. I look forward to receiving the Council's response to my and other contributor's feedback into the Consultation/Planning invitation for comments	Development Framework that has been endorsed by the council. ~~.~~Based on these considerations, the land use mix and residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. The amount of car parking provision on any future redevelopment of the site would be considered having regard to the nature and scale of development, and in line with the parking standards set out in Part 2 of the Local Plan on Transport and Connectivity. In general, the Local Plan seeks to limit the amount of car parking to encourage a shift to more sustainable travel modes such as walking, cycling and public transport. Speed limits are outside the scope of the Local Plan. However, the plan does advocate for Healthy Streets principles in support of sustainable travel, to reduce vehicular dominance and improve safety. The Council has consulted statutory consultees on the Local Plan proposals, including Greater London Authority / Transport for London, Metropolitan Police Service and Bromley Council. Their feedback will be used to inform the Regulation 19 stage document. Transport Assessments are required alongside any major planning application so there is no need to specify this requirement in individual site allocations.	
	3	LSA SA 15	6. With regard to the proposed development of a traveller site for the Borough at Pool Court (off Fordmill Road), I fail to see why such individuals should be treated as a separate case and not treated like all other citizens and integrated into the borough like all others. You only need to think back at the previous site next to Lewisham Station and how it was kept. If such individuals do not wish to associate with their average neighbour, then it is up to them to make their own arrangement and not for the council to devote resources for unnecessary favourable treatment. The sooner they integrate the better.	Noted. The National Planning Policy Framework requires the Council to identify and plan positively for the housing needs of the gypsy and traveller community through the Local Plan process. The site allocation will help to ensure these requirements are satisfied.	No change.
	3	LSA SA 15	Re: Population of Pool Court & Objection With the reference to the above, I am writing to inform you that since 2016, 100% of Sybil Phoenix House residents objected to the proposal. The population of Pool Court confirmed in 2016 that they will be adversely affected and had strongly objected to the Council planting a G&T traveller site adjacent to Pool Court. Please find attached copies of our letters sent on 28th November 2016 and 8th January 2018.	Objection noted. The Council also acknowledges that previous objections have been received from on emerging proposals for the Pool Court site. The National Planning Policy Framework requires the Council to identify and plan positively for the housing needs of the gypsy and traveller community through the Local Plan process. The site allocation will help to ensure these requirements are satisfied. Any future development proposal for the site will need to demonstrate that it will not lead to an	No change.

			We need to be safeguarded and with the COVID in the air, the vicinity at Pool Court must be particle infection-free as we all know what happens with the gypsy residential use of land and the rubbish that is left behind when they moved from place to place. A daily working camera is needed to protect the anxious habitant. After all, we pay our taxes just like everyone else in the borough of Lewisham. Therefore, we expect to be safe.	adverse impact on amenity and public health and safety, in line with other Local Plan policies.	
	3	LSA SA 15	RE: Population of Pool Court and Objection With reference to the above, I am writing to inform you that since 2016, 100% of Sbyil Phoenix House residents objected to the proposal. Please see attached Pool Court's petition from no 62-73. **<Lewisham officer note: supporting documentary evidence of signed petition provided>** The population of Pool Court confirmed in 2016 that they will be adversely affected and had strongly objected to the Council planting a G&T traveller site adjacent to Pool Court. Please find attached copies of our letters sent on 28th November 2016 and 8th January 2018. We need to be safeguarded and with COVID in the air, the vicinity of Pool Court must be particle infection-free as we all know what happens with gypsy residential use of land and rubbish that is left behind when they moved from place to place. A daily working camera is needed to protect the anxious habitant. After all, we pay our taxes just like everyone else in the borough of Lewisham. If the community is equally valid, therefore, we are expected to be safe, protected from harm. Failing to do so, you will be held responsible for any disruption that would affect the population of Pool Court.	Objection noted. The Council also acknowledges that previous objections have been received from on emerging proposals for the Pool Court site. The National Planning Policy Framework requires the Council to identify and plan positively for the housing needs of the gypsy and traveller community through the Local Plan process. The site allocation will help to ensure these requirements are satisfied. Any future development proposal for the site will need to demonstrate that it will not lead to an adverse impact on amenity and public health and safety, in line with other Local Plan policies.	No change.
London Wildlife Trust	3	LWA	We support these principles, especially in respect of Parts B and G. We particularly welcome the reference to the landscape character of the old Great North Wood (including within supporting paras 18.8, 18.9), and how this is to be best protected within the Plan.	Support noted.	No change.
	3	LWA	I consider myself to be very fortunate to live in West Lewisham, particularly over the last 40 years living in Forest Hill and Sydenham, where Public Transport links are really good for both rail and buses, and there is a wide range of excellent facilities, many parks, varied retail, diverse groceries, a swimming pool nearby, Libraries (under pressure), the Sydenham Centre, Many good Pubs, the Comedy Poodle Club, restaurants and cafes, the Horniman Museum at Forest Hill, the Undertakers, Sports, Yoga and the Arts. The feted '20 minute Neighbourhood' to meet most immediate needs, more or less exists in this area. What are the issues then, I observe that retail and local business are in crisis. I think I am correct that two banks	Noted. The Local Plan and its spatial strategy broadly support the '20-minute neighbourhood' approach. The preparation of the plan has been informed by key evidence base studies, including on employment and town centres. The Part 2 policies on Economy and Culture seek to provide flexibility for a wider range of uses to locate in town and local centres to support their long term vitality and viability. Changes to the Use Class Order however limit the scope for the plan to control the specific mix of uses within centres (for example within the new Class E category, where changes of uses between different types of activities are permitted without the need for planning consent),	No change.

			and a Building Society have closed in very recent years, we have only one bank left on Sydenham Road. Even without the Pandemic, businesses opened and closed frequently, and the same breadth of services do not re-open. A lot of shop fronts are shabby. Do we really need three Gyms, endless Pound shops and Phone shops? Change is of course inevitable and the Pandemic has not helped at all, but it is not easy to stick to Planning aims, if there is panic over empty premises and no finance to have a choice of outcomes or plans to extend potential usage.		
	3	LWA	I think the conservation area in Brockley should have a plan to develop one off houses of architectural merit. There are already residential houses on many of the mews and the blanket ban on residential in the mews, should be lifted. There are some extremely cool houses in the mews and this is something Lewisham should be proud of.	Noted. The Local Plan Part 2 Policies on Heritage broadly support sensitively designed, contemporary housing designs in Conservation Areas. The extant and emerging Local Plans do not set blanket restrictions on new developments, however the policies seek to ensure developments respond positively to local and historic character, including the significance of heritage assets and their setting.	No change.
	3	LWA	Live/work should be encouraged in the area [Brockley] too. Covid has proved that a variety of businesses benefit from purpose built live/work buildings.	Noted. It is acknowledged that there is authorised live-work development in Brockley Rise area and Local Plan will be amended to provide in principle support for this type of development in specified locations.	Local Plan amended to provide additional support for live-work accommodation in Brockley (Dragonfly Place Endwell Road and Ashby Mews).
	3	LWA	In 2016 the Council instructed a traffic survey of Drakefell Road and the immediate area. I have attached a copy (Project Centre Report Drakefell Road.pdf). The study identified a number of opportunities for improvement. None have been implemented. Local residents have long been advocating safer streets and a healthier neighbourhood. They were in active dialogue with Cllr Dacres (Cllr McGeevor's predecessor as cabinet member for transport) on the challenges faced by Drakefell Road and on the urgent need to address the issues caused by Drakefell Road being used as a rat run for drivers from outside of the borough who are trying to avoid the A2 and A20. In 2017, Will Norman, TfL's recently appointed Cycling Czar, attended the area and was very supportive of the need to address issues of pavement parking, lack of crossing points and an antisocial environment.http://www.drakefell.org/drag/12-drag-meets-mayor-s-walking-cycling-commissioner. In or around 2018, LIP3 funding had been allocated to improving the B2142 corridor and (subject to a further consultation) Sustrans was to be tasked with helping build a modified road layout that would be trialled for 6 months in a temporary form and then constructed in 2021. In particular filters were discussed which would have the effect of reducing the overall traffic volume for the whole ward, not just Drakefell Road. This funding was subsequently withdrawn. There has been a recent campaign to set up a school street outside the Haberdasher primary school on Pepys Road.	Too detailed for the Local Plan. We will pass your comments on to the Transport Team.	No change.

			The campaign and its petition was about making the journey to school safer. I am delighted that the school street seems to be going ahead but once again Drakefell Road which is crossed by a great many parents and children on their way to school seems to have been forgotten. There are a number of allocated or proposed sites for development which impact on conditions in Drakefell Road, including a proposed development on the current Sky Roofing industrial site (corner of Drakefell Road and Wallbutton Road) as well as the site at Brockley Cross. There is clearly time for action. Drakefell Road is a sorry story of the Council and our elected representatives burying their heads in the sand.		
	3	LWA	I would like the Drakefell Road and Gellatly Rd corridor to be considered for LTN status. The road is getting busier and for years now no action has been taken to address this and its consequences. There are more people living on this road than many in the surrounding vicinity and yet more and more traffic is funnelled down the road. There are regular traffic jams down the road. The east of the road is a pollution black spot. Every few minutes there is a car exceeding the speed limit on the road. The road is surrounded by schools but the crossings are poor or non existent. The mix of traffic is now noisier with more LGVs and delivery bikes. You literally cannot hear your neighbours! No one wants to spend time at the front of their house so the community is weaker because of it. We have applied for no car days but been rejected. We have highlighted the weak bridge on Avignon road which is not enforced and lorries regularly travel over it, but again nothing has been done. We continue to get HGVs using the road as a shortcut and getting stuck. The road is plagued by cars parking on pavements which was made illegal in the 1970s but still somehow continues in Lewisham even though walking is now promoted as a key mode of travel by the council. The crux of the matter is ‘car’ king or is community? An LTN status for this corridor is an important first step to begin to address these worsening problems.	Low Traffic Neighbourhoods are outside the scope of the Local Plan. However, this suggestion will be referred to colleagues in the Council’s Transport service for their consideration.	No change.
	3	LWA	**Are there any other issues and/or approaches for the area that you feel should be considered?** What happened to TFL's plans to address the queuing traffic on Waldram Crescent/London Road? There was talk of a diversion of traffic to the underpass walkway on Perry Vale which runs under the railway (which would mean no bend and a filter lane for Dartmouth Road could be introduced, reducing need for traffic lights). This should be part of the plans/be revisited - that is the only way that the A205 approaching Forest Hill could be converted to a healthy street.	Specific transport improvements such as diversions, filter lanes are beyond the scope of the Plan. Your coments will be forwarded on to the Transport team.	No change.

	3	LWA Fig 13.1	2. DIVISION OF SECTIONS- With relation to Telegraph Hill, the local plan section divisions appear to be totally arbitrary and make no sense at all. They do not take into account how the communities in those areas behave or what parts of the borough they are connected to and relate to for shopping etc. I live at the north end of Pepys Rd. I sat through zoom for 'my area' discussion from the council and realized it did not relate to me at any level. They were talking about Sydenham? Forest Hill? and goodness knows what other places, areas with which we have zero connection!!!!!!!!!!!!!!!!!!!!!!!!!!!! On Telegraph Hill, we connect with the New Cross Road, Queen's Road. We shop at Sainsburys in the New Cross Road and on our own parades. We look to the Old Kent Road, Peckham, on occasion Deptford and Nunhead. But NEVER towards the areas mentioned in the discussion. I have never shopped or even visited the areas they mentioned, except for the Horniman's Museum. It is ludicrous to bang us in with them. To us, those areas are like another borough entirely. There is no logic to being unprecise and untidy with these borders for the Local Plan. They are too important to allow them to be so carelessly and messily drawn. Problems will arise down the line if these things are not ironed out properly. Telegraph Hill should be one unit. It was built as a unit in 1880, and is now a successful conservation area. The conservation area map could be considered as a guide for one of your sections, which would at least be logical as well as realistic. 3. In particular, I would like to comment that parts of our conservation area have been wrongly classified as ripe for opportunity. REALLY? This is nonsense as we are in a distinct conservation area with clearly defined border. Nothing BLURRED there. This kind of careless and clumsy mapping with its arbitrary divisions is confusing! Developers who do not know the areas might be encouraged to think they can start trying to destroy parts of conservation areas as well as others. My home falls into one of your "Opportunity areas" and I am on Telegraph Hill within the conservation area. This should not be allowed to stand. The chairman of the discussion from the council actually tried to persuade us that boundaries don't matter because the edges are blurred! What does this mean? He defended it as if it was an asset to be imprecise and ambiguous? That is very worrying. Everything is about being accurate. Otherwise everyone will think they can bend the rules at infinitum. A lack of precision invites varied interpretations. This is dangerous when you have developers snooping around. The boundaries of the local	Part 3 of the Local Plan deals with Lewisham's 5 character areas. It sets out a vision, spatial objectives and planning policies for each. The sub-area approach responds to feedback from the public for the Local Plan to set a more 'place-based strategy' with a renewed focus on Lewisham's neighbourhoods. The character areas (and neighbourhoods within them) were informed by the Lewisham Characterisation Study, which was prepared in collaboration with community groups and subject to public consultation. Whilst it is acknowledged that people may not agree with the geographical extent of the areas, the character areas provide a useful way of planning at a more localised neighbourhood level.	No change.

			plan sections MUST be very clear and precise to avoid abuse.		
	3	LWA	Telegraph Hill: Most people who live here do so because of the beauty and convenient facilities of the Victorian hill design. Yet protections for it seem to constantly be watered down when the plan should be leading the way on restoring and preserving what makes the area so wonderful. Where is the commitment for the Council to lead the efforts of preserving and restoring and policing more strongly that developments enhance rather than destroy? It's clear to anyone living here that infill construction could destroy all we value….and should be only allowed when it fits seamlessly with the traditional architecture that exists. There are wonderful examples where this has been done…and terrible examples where it hasn't. This would be easy to prescribe in the plan. We have so few family homes left that the plan should strengthen the protection of those remaining and ban further conversions of family homes to flats and HMOs. Policing and fines for those who infringe such rules should be increased, not relaxed.	Disagree. The Local Plan seeks to ensure that all new development preserves and enhances the significance of heritage assets and their setting, consistent with national planning policy. This includes conservation areas. The Local Plan sets out a strategy to deliver Good Growth that responds to the distinctive features of Lewisham's neighbourhoods. The plan recognises that infill development can help to restore and repair elements of the historic environment that have been eroded or lost. The Local Plan Part 2 policies on Housing seek to ensure that provision is made for a mix of housing types to meet local needs, including family housing. It includes policies to manage HMOs and ensure that development involving conversions does not result in the loss of family homes.	No change.
	3	LWA Fig 18.2	It is noticed that the West Lewisham link passes through Brockley & Ladywell Cemeteries. Although another map shows it as a walking route this does not mean that it will not be used by cyclists. The Cemeteries are havens for wildlife and for families to pay their respects, so such an activity is not appropriate. On the same map, Ivy Road is shown as an alternative route. This is preferable.	Map amended showing alternative route The cycle routes and quiet ways have been derived from the Lewisham cycle strategy – the Lewisham links routes are not intended to be key cycle routes.	No change.
	3	LWA	On 23rd of March I received an email from the HopCroft Neighbourhood Forum informing me that Lewisham Council had opened consultations on a range of potential developments across Crofton Park and Honor Oak. If I had not received this email, I would have been unaware of the consultations. One of the proposals is on land (car-park and garages) currently used by residents of the block that I live in. I have spoken to most of the neighbours in our block (310-316 Brockley Road) and some residents on Whitbread and Comerford Roads. None were aware of these consultations because there are no signs and we have not received any postal notifications about the plans. All confirmed that they rejected the proposal. In 2017 residents rejected a similar proposal because it would remove one of the few nearby local green spaces, block evening sunlight to residents on the lower floors of 310-316 Brockley Road and the Comerford Road block and morning sunlight to some residents on Whitbread Road. The proposal was also rejected because it would reduce amenities (including parking) to local residents. None of these issues have been addressed in the latest proposal, if	This consultation referred does not concern the Local Plan. Rather it is the Regulation 16 stage consultation on the Honor Oak and Crofton Park (HOPCROFT) Neighbourhood Plan. This plan identified a site named 'Land and Whitbread Road' as a potential development site. The neighbourhood plan is separate from the Local Plan.	No change.

			anything they are literally being buried by building over them. Whitbread Road is also full with many residents and non-residents already parking on the road so the amount of traffic and noise would increase and the lack of car-parking space would be exacerbated. At present non-residents already park in our block's car-park so there are not enough spaces. Our block's car-park could benefit from electric car charging parking facilities. I would like to confirm that I reject this proposal. However, many residents have commented and complained for years as to why the green lawn by our apartment block (off Whitbread Road) was fenced off and the gate locked. Our block and neighbouring residents would like this area to be opened up as green space for public use. This could be as a mini forest to help local biodiversity or be turned into a mini community park or play area for local kids. The COVID crisis has highlighted the importance of (public) green space and many residents in local blocks do not have gardens. Residents and Council tax payers have to pay to maintain the fenced off green lawn area which they no longer have access to. At present this land offers limited to no environmental, social or economic benefits to local residents or the Borough. Instead of being used to generate funds we waste tax payers money maintaining it for no added value and this has been the case for decades. Situations like this need to change across the Borough		
Brockley Better Streets	3	LWA TR 01	Our research shows local priorities in the Ladywell/Brockley area are: • Increase safety for everybody inside and around the Brockley Conservation Area • Prioritise cyclists, pedestrians and public transport • Reduce pollution • Emphasize the tranquil & residential nature of Brockley • Make the access points to Hilly Fields park safer for pedestrians, cyclists and public transport • Co-ordinate work across the Borough, and across London Boroughs, to reduce the through commuter traffic on residential roads from outer London to inner London. This traffic peaks during the morning and evening rush hours. The issues that need immediate attention are: • Too many accidents / near-misses • Heavy goods vehicles / buses / lorries driving through residential areas • Danger spots • Speeding • Aggressive / anti-social behaviour of motorists • High volume of cars • Use of residential roads as 'rat runs' • Cars on the pavement • Structural impact on properties • Exhaust emissions • Overcrowding	Many of these priorities are captured within draft Local Plan within the strategic objectives and/or within the policies in Part 2 and 3 of the plan.	No change.

			Possible solutions have been identified through a community design workshop covering the Brockley and Ladywell wards: • Wider pavements • Cycle lanes / designated routes • One-way systems • Bus filters • Road layout (‘Dutch roads’) • Landscaping • Road furniture • Zebra crossings / traffic islands • Parking bays • Crossing wardens during school hours The roads most affected by rat runs in the Brockley / Ladywell area identified at the workshop and through other local consultations are shown here: 		
Brockley Society	3	LWA EC 11 Policies Map	Ward Boundary Review and relationship with Lewisham Way As the result of the Local Government Boundary Commission review of 2019/2020 it is affirmed that ‘in readiness for national elections in May 2022’ Brockley Ward should embrace the residential areas of Brookmill Road and St John's Conservation Areas. This means that Lewisham Way (A20) is now to be seen as an integral part of Brockley Ward and is not to be regarded as just a boundary as indicated on the West Area Key Diagram (p736). The importance of this demands that as a major NW-SE traffic cross route it merits inclusion to be upgraded on a	Noted.	Local Plan amended to refer to Lewisham College

			par with the transformation status afforded to the South Circular and Brockley Rise/Brockley Road re becoming a 'healthy street' with public realm improvements. In further justification for this it is highlighted that Lewisham Way is uniquely bordered on the south by substantial mature landscaped strips in the form of Deptford Memorial Gardens as extending beyond Wickham Road to Breakspears Road and thence to Lewisham College* and its car park beyond Tressillian Road. As these features are complemented on the north by the recently reinstated green area fronting Ashmead Primary School (as extended to face Lewisham Way) as well as the landscaped areas of St John's Church and the Bright Horizon's Day Nursery it is suggested that a unique opportunity now exists to designate Lewisham Way as a 'roadside local centre and green way'. A strong link with Spatial Objective 9 is therefore gained (p735). It is recommended thereby that this concept should be adopted and that the proposed boundary for Lewisham Way Local Centre be adjusted accordingly in the Draft Plan (p17 of the Proposed Changes to the adopted Policies Map along with references in the text to 18 Lewisham West Area at e.g. paras 18.5, 18.7, LWA1 Ac, LWA2 B, LWA4, 18.13). * NB: the reference to Southwark College (para 18.4) is incorrect - it should be changed to 'Lewisham College'.		
Brockley Society	3	LWA TR 01	**Brockley Station Interchange** It is appreciated that the intention to secure and deliver the Brockley Station Interchange is being retained as a Key Spatial Objective (p735 and TR1 p445). Whilst this deals with the possibility of providing platforms at a higher level to permit interchange between services that crossover from Lewisham to Victoria and Blackfriars the need for a Feasibility Study on the practicalities of this is paramount. As the former street level links to Brockley Lane Station still exist decisions on protecting the delivery of this vision are required. A Statement of Intent for Brockley Cross is needed as LWA5 or similar and should build upon the Local Centre Policy Map area (shown in Lewisham Local Plan - Proposed changes to the adopted Policies Map of December 2020, p18).	Support for Brockley Station Interchange noted. The Council will continue to work with stakeholders, including GLA/TfL and Network Rail, to investigate the feasibility of delivering this infrastructure upgrade. Local Plan Policy LWA2 (Connected network of town centres) addresses Brockley Cross however it is recognised that additional details could assist with the plan's implementation.	Local Plan amended with additional details on the role of Brockley Cross in supporting the spatial strategy.
Brockley Society	3	LWA EC 03	**Live:Work Accommodation** It is noted that live:work development is focused on the Forest Hill District Centre ((LWA3, p743 and Lewisham West Area, p746, para 18.11) as the only location in the Borough. This is incorrect as Ashby Mews in Brockley is a similar location where live:work units are being successfully integrated. Reference to this therefore also needs to be linked in with the Brockley Cross document LWA5 as suggested above.	Noted. It is acknowledged that there is authorised live-work development in Brockley area and Local Plan will be amended to provide in principle support for this type of development in specified locations.	Local Plan amended to provide additional support for live-work accommodation in Brockley (Dragonfly Place and Ashby Mews).
Environment Agency	3	LWA	**Lewisham West Area feedback**		Some amendments to sites allocations have been made in line with the comments provided in the table of sites

		Site allocations	*LB Lewisham officer note: Table of sites with water management information included in original representation.*		
Forest Hill Society	3	LWA LWA SA 05 LWA SA 10	**Public Realm Issues** The Forest Hill Society fully welcomes the Lewisham Local Plan's content relating to the public realm. A. We welcome and support the consideration given to redevelopment and site intensification at the lands at Forest Hill station East and West. We consider this a pivotal and necessary opportunity to improve the sense of arrival to the area, as well as improving safety and utility for commuters and visitors. Our two concerns with this content are as follows: B. For the Station West land, the proposed 'retention or appropriate re-provision of the existing dental surgery' does not address the blocker this unit presents to greatly more meaningful transformation of the station approach and forecourt. We would contend that demolition of the existing buildings that consist of the dental surgery and bookmakers is essential to enable the redesign of this key junction and access point. Appropriate re-provisioning of the Dental Surgery, Post Office and Newsagents and other business should of course be addressed in this case in the Station redesign. C. For both Station East and West lands, we would encourage the inclusion in scope for the addition of pedestrian crossings and for improvements to the crossings on the immediate roads: ● The lands to the Station's east exit present an absence of a suitable pedestrian crossing close to the station's exit on Perry Vale that the Society considers to be a hazard. ● The Station West land's current crossings of the immediate South Circular present a sense of 'islands within traffic zones'. These crossings significantly impede the sense of arrival for pedestrians including those arriving by rail to visit the significant cultural destination of the Horniman Museum and Gardens, and the Cultural Quarter site / commercial site of Havelock Walk. D. The walking and cycle environment can be compromised along with the necessary passing widths for wheelchairs and prams in case of poor placement of street furniture such as electric vehicle charging infrastructure. We encourage measures to ensure that public footpaths and cycleways in the area are only improved upon. E. Consideration should be given to improvements of the layout and configuration of Perry Vale from its junction with Waldram Place to the South Circular, particularly to address public footpath clutter and provision of space for storage of wheelie bins. (Appendix C)	Noted. The Local Plan is a strategic policy document and the Council needs to carefully consider the level of detail provided for each area within the site allocations. It would be too detailed to refer to all existing businesses that should be re-provided within all of the site allocations. This will be determined through the Development Management process. It is worthwhile referencing the need for an enhanced pedestrian environment, without citing specific, detailed schemes. Agree that the word retention of the existing dental surgery may restrict redevelopment from taking place.	Land at Forest Hill Station West site allocation amended to make reference to improving pedestrian crossings and pavement widths within the vicinity of the site and to remove the word "retention". Land at Forest Hill Station East site allocation amended to make reference to a new pedestrian crossing and pavement widths within the vicinity of the site
Forest Hill Society	3	LWA	**Appendix A – Forest Hill Station and Town Centre Masterplan (Discourse Architecture Design Pack)**	The Local Plan sets out the Council's strategic framework to facilitate Good Growth within and around Forest Hill. Officers have reviewed the community-led masterplan, and consider that the Local Plan reflects the broad aims and principles of	No change.

			Appendix B1 Forest Hill Station and Town Centre Master Plan: Provision of Housing and Commercial Space Estimates. **Appendix B2 Forest Hill Station and Town Centre Master Plan: Provision of Housing and Commercial Space Estimates.** **Appendix C: Waldram Place and Perry Vale Road Layout Alterations** The Society considers it essential that pedestrian crossing be installed on Perry Vale in proximity to the exit for Forest Hill Station. Whilst the crossing is not indicated on the sketches, the Council is invited to add this proposal in its entirety to the Local Plan. *Officer note: Appendix submitted as formal representations.*	this. However it is recognised that there are feasibility and financial viability issues which may preclude or complicate the delivery of some elements of the masterplan (for example, those dealing with strategic infrastructure such as the A205 and Forest Hill Station / station approach), and they have not therefore been incorporated into the Local Plan. The indicative site development capacities set out in the Local Plan site allocations have been established using a standard methodology, which the Council considers is robust.	
HopCroft Neighbourhood Forum	3	LWA Figure 18.2	**Fig 18.2:** • Should mark the key nature reserves along the marked 'strategic green links' • Duncombe Hill as a London Square and Local Green Space should be marked particularly as it is of significant visual amenity value. • Malham industrial estate should be marked as a designated employment site. • The Special landscape character of the New Cross to Forest Hill cutting should be marked.	Nature reserves are not planning policy designation but are noted in the Appendices of the Local Plan. Duncombe Hill has been designated as strategic open space within the made Crofton Park and Honor Oak Neighbourhood Plan. It is designated local green space. Employment sites are indicated in Fig.81 Employment Land Hierarchy.	No change.
Residents Drakefell and Gellatly Roads	3	LWA	After many years of dedicated collaboration with councillors on the issues of Drakefell and Gellatly Roads, we fully expected to see some mention of these roads in the detailed plan for the "West Area". However, Section 8 talks about transforming the South Circular, Brockley Rise and Brockley Road into "healthy streets" and there is not so much as a mention of Drakefell and Gellatly Roads. We would like to understand on what criteria Drakefell and Gellatly Roads are ruled out of being a Low Traffic Neighbourhood, or indeed of being a Safer School Street - the Haberdasher Aske's students have to cross Drakefell many times per day to reach their sports ground.	The Local Plan does not rule out streets being part of the Low Traffic Neighbourhoods. We will pass on your comments to the Transport team.	No change.
Residents Drakefell and Gellatly Roads	3	LWA	In May 2020 we wrote to Councillor Sophie McGeevor, as Cabinet Member for Transport, about the dangerously weak bridge on Avignon Road. We recommended that a bus gate be put in place. As far as we know, no changes have been made to the structure of the bridge and heavy skip vans and lorries continue to pass over it despite being significantly heavier than the weight restrictions. This is an urgent and dangerous issue. A simple solution of a bus gate with ANPR camera could improve safety while actually generating much needed funds for our road and our ward in general. We request an urgent update on this situation.	Specific transport improvements such as bus gates are beyond the scpe of the Local Plan. Your comments have been forwarded to the Transport team.	No change.
Sydenham Society	3	LWA	**Key Spatial Objectives** (p735) **Comment:** These are supported	Support noted.	No change.
Telegraph Hill Society	3	LWA	We have little comment on this section which appears to ignore Telegraph Hill. See our comments on the North Area for our overall view that the Telegraph Hill and Hatcham	Noted. The character areas or sub-areas in the Local Plan were informed by the Lewisham Characterisation Study, and provide a helpful means of providing	No change.

			Park Conservation Areas should be brought into the West Area in order to allow for a holistic treatment of the former Haberdashers' estate development and for our comments on how, if this is not done, the two sections of the Plan should be consistently presented to protect the joint area. The key requirement would be an SPD covering the whole estate.	policies at a more granular or neighbourhood area (rather than borough-wide) level. The Local Plan must be read as a whole for planning decisions, which is clearly stated in Part 1 of the plan. The Council will consider the preparation of future SPDs to support the implementation of the Local Plan, taking into account resources available and key priorities areas to support the delivery of the spatial strategy. For Conservation Areas, the Council has and will continue to prepare a suite of Area Appraisals which provide additional guidance.	
The Hatcham Society	3	LWA	We back the Telegraph Hill Society's view that Hatcham and Telegraph Hill, as parts of the Haberdashers' Estate, and as areas negatively affected by the A2, should be treated holistically in the Plan. Hatcham has more in common with Telegraph Hill (architecturally and in terms of heritage features) than with North Deptford. We propose therefore that the Hatcham area should be included in the West Area so that New Cross Gate, Hatcham Park and Telegraph Hill can be considered holistically.	Noted. The character areas or sub-areas in the Local Plan were informed by the Lewisham Characterisation Study, and provide a helpful means of providing policies at a more granular or neighbourhood area (rather than borough-wide) level. The Local Plan must be read as a whole for planning decisions, which is clearly stated in Part 1 of the plan.	No change.
The Hatcham Society	3	LWA	We also back the Telegraph Hill Society's view that a design guide on the Haberdashers' Estate (incorporating both the Telegraph Hill and Hatcham Conservation Areas) should be produced in order to ensure that a consistent approach is not lost by virtue of the arbitrary North/West split.	The Council will consider the preparation of future SPDs to support the implementation of the Local Plan, taking into account resources available and key priorities areas to support the delivery of the spatial strategy. For Conservation Areas, the Council has and will continue to prepare a suite of Area Appraisals which provide additional guidance.	No change.
Transport for London	3	LWA	We encourage public realm improvements around Forest Hill District Centre including to and near the South Circular. As mentioned in the local plan, we are happy to discuss the detailed plans along with Network Rail, before any details get incorporated in the local plan. It will be essential that bus journey times are not worsened. As part of this site allocation, consideration should be given to development of the large car park to the east of the station and some of the much smaller one adjacent to the main western entrance, along with public realm improvements.	Support noted. The site allocations in proximity to Forest Hill station include the existing car parks, and the policies support their rationalisation to deliver new mixed-use development that optimises the capacity of sites. The Council will continue to engage with GLA/TfL and Network Rail to deliver public realm and transport improvements in this area.	No change.
Residents of Sydenham Hill	3	LWA	**2. Sydenham Ridge: Area of Special Character** We are concerned that the proposal to remove the Area of Special Character from Sydenham Hill is intended to further the infill policy which has already eroded the green spaces and views across Kent from Sydenham Hill, as well as impacting negatively on our wildlife habitats and corridors. We have noted that the development of Wells Park Place and Exeter Place at the top of Wells Park Road / Sydenham Hill has resulted in large quantities of hard landscaping at the expense of green land, the destruction of a mature and majestic oak tree and the displacement of springs which have been forced to emerge further down the hill. Token planting of non-indigenous decorative trees in formal lines is no substitute for the habitats thereby lost.	Noted. Following a review of the designations it is proposed to include Sydenham Hill Ridge as an ASLC in the Regulation 19 document. The draft Local Plan sets out a revised suite of polices on green infrastructure (Part 2 – Green Infrastructure) which seeks to provide stronger protection and enhancement green spaces, tress and biodiversity/habitats.	Local Plan amended to include Sydenham Hill Ridge as an Area of Special Local Character.
Residents of Sydenham Hill	3	LWA	The proposed change to an Area of Special Local Character would allow building close up to non-heritage assets (such as the locally-listed buildings and the 1960s award-winning	Noted. Following a review of the designations it is proposed to include Sydenham Hill Ridge as an ASLC in the Regulation 19 document.	Local Plan amended to include Sydenham Hill Ridge as an Area of Special Local Character

			housing estates). The Site of Importance for Nature Conservation (SINC) would also be jeopardised on the Hillcrest Estate. The essential characteristic of the ridge, as a landmark running across the whole of South LONDON, of unbroken tree line, has already been threatened by the permission granted at Mais House, and demonstrates that the Tall Buildings policy carries no weight.		
Residents of Sydenham Hill	3	LWA	The reason given in the Lewisham Local Plan Appendix 2, para 6.8, is not convincing, that it would simplify the system if the designation were changed from ASC to ASLC, and appears to have no basis in terms of the importance given to the ridge by Natural England and by the GLA when it designated Sydenham Ridge as an Area of Special Character, " which comprises a topographical feature where tall or bulky buildings would affect the landscape and local residential amenity " (Lewisham Core Policy 17, the protected vistas, the London panorama and local views, landmarks and panoramas 2011 version) due to its "unique contribution to London".	Noted. Following a review of the designations it is proposed to include Sydenham Hill Ridge as an ASLC in the Regulation 19 document. It is considered that the draft Local Plan Part 2 policies on Building Heights and Views, in combination with the designation of Sydenham Hill Ridge as an ASLC, will provide appropriate policy protection for the character, landscape and topographical features of the ridge.	Local Plan amended to include Sydenham Hill Ridge as an Area of Special Local Character
Residents of Sydenham Hill	3	LWA	**We strongly oppose any change to the ASC designation**. The area of this designation however could be improved to extend it, so that it covers the entire Sydenham Hill Estate, and also ideally across the Lammas Green conservation area to go as far as the Horniman sites of borough importance.	Noted. Following a review of the designations it is proposed to include Sydenham Hill Ridge as an ASLC in the Regulation 19 document. It is considered that the draft Local Plan Part 2 policies on Building Heights and Views, in combination with the designation of Sydenham Hill Ridge as an ASLC, will provide appropriate policy protection for the character, landscape and topographical features of the ridge.	Local Plan amended to include Sydenham Hill Ridge as an ASLC.
	3	LWA Key spatial objectives	I am writing in response to the Consultation on the Lewisham Local Plan (closing date April 11th 2021). Regarding the Lewisham West section of the draft plan, I note the proposal to: *"Transform the South Circular (A205) and Brockley Rise / Brockley Road (B218) into 'healthy streets' with public realm improvements that make walking, cycling and use of public transport safer and more convenient".* Feeding into the B218 is the B2142 (Drakefell Road) which seems to have been omitted from the draft local plan. Lewisham council will recall that there has been a very long standing campaign by local residents regarding Drakefell Road. It is a residential road that suffers from traffic entirely unsuitable for a road of this nature. It is used by a large number of vehicles as a rat run to avoid heavy traffic on the A2 and A20.	The Local Plan does not rule out streets being part of the Low Traffic Neighbourhoods. We will pass on your comments to the Transport team.	No change.
	3	LWA Site Allocations	**Please provide your comments on the site allocation(s) selected above.** It seems excessive to have 3 separate sites in Forest Hill so close together. This will block views, create noise pollution due to works, increase traffic on the A205/more congestion at the bend to Forest Hill station which is dangerous. This is already densely populated area of Forest Hill. Lewisham Council suggest that the sites are mainly currently retail sites; that's simply not true; Perry Vale @	The London Plan provides a general direction that new development should be focussed within and around town centres and other highly accessible locations, amongst other locations. The Local Plan helps give effect to this approach through the spatial strategy for the borough. The Local Plan Part 2 policies set out requirements on design and will help to ensure that development proposals respond positively to the site and neighbourhood context. The	No change.

			Waldram Park Road & Waldram Crescent are heavily residential already and would be surrounded by these new sites.	West Area site allocations will support the delivery of the spatial strategy along with the long-term vitality and viability of Forest Hill district centre; they include development requirements and guidelines specific to the local context.	
Brockley Society	3	LWA 01	**Brockley Road and new development/intensification** Given the declared vision (LWA1 c, p757) that new development be directed to the main corridor of Brockley Road (B218) it is highlighted that those areas lying within the Brockley CA should be exempt from this requirement. In particular, the rows of shops and commercial property situated between: ^ Brockley Cross and along Brockley Road to Harefield Road ^ Wickham Road to Adelaide Avenue (known as 'Mid-town Brockley') should be excluded and that reliance on the assessment of future development should still be made via the Brockley CA SPD and the application of Article 4 Directions.	Noted. It is considered that the presence of a Conservation Area should not preclude development from coming forward. Sensitively managed intensification can be achieved where development conserves and enhances the significance of heritage assets and their setting, in line with national planning policy. The Local Plan makes clear the importance of the historic environment, and this is set out in Policy LWA1 and Part 2 policies (Heritage). Where there are heritage assets within or along the corridor, the policies will help to ensure that any such intensification is appropriate to the local context. The Local Plan must be read as a whole. The making of Article 4 Directions is outside the scope of the Local Plan.	No change.
Brockley Society	3	LWA 01	Page 737, paragraph B: We would suggest the following amendment: *Development proposals must respond positively to the character <u>and heritage value</u> of established residential areas…*	Noted.	Local Plan amended as suggested.
Brockley Society	3	LWA 01	Page 738, paragraph E: We would suggest the following amendment: *The sensitive intensification of established residential neighbourhoods will be supported where new development responds positively to their distinctive local character, including the landscape setting <u>and any conservation area or other heritage assets</u>.*	Noted.	Local Plan amended to refer distinctive local and historic character.
Brockley Society	3	LWA 01	Page 739, additions to paragraph J on page 738: For the reasons mentioned above, please add the following: *<u>d. Lewisham Alterations and Extensions SPD (2019)</u>* *<u>e. Where applicable, conservation area Character Appraisals and SPDs</u>*	Disagree. Select SPDs are mentioned within site allocations where they are directly relevant to the site.	No change.
HopCroft Neighbourhood Forum	3	LWA 01	This policy does allude to the historic landscape character : **"***The historic landscape character, including woodland and topography, is also a defining feature of the West Area, which was once covered by the Great North Wood. Proposals will be expected to maximise opportunities to integrate urban greening to respond to and connect the remnants of the woodland, along with protecting and enhancing important views and vistas. "* However, without explicit mention and highlighting on the map, it is not clear what this clause is referring to, especially to those who do not know the area. This must be better explained and the cutting must be explicitly mentioned. (See recommended text below) Clause B must say it will not support development of the historic area of special local landscape.	Buckthorne cutting – identified as MOL and is therefore offered the highest possible protection.	No change.

			The Buckthorne Cutting in Crofton Park formed part of the hamlet of Brockley Green, a name which has since disappeared from Ordnance Survey maps. It sat immediately adjacent to the area identified as being part of the 'Great North Wood' living landscape. The Great North Woods once stretched across the high ridge of land between Deptford, Selhurst and Streatham. It forms the western green infrastructure spine, connecting to the middle spine along the Catford Loop railway corridor. Between 1805 and 1809 the Croydon Canal was built and at Brockley Green/Buckthorne Cutting it reached its highest point (reported to be at 150/160 feet above sea level). The steep hill may explain why this section of woodland (Gorne Wood as it was named in 1600, to the the arrival of the canal in 1805) remained as a remnant of the Great North Wood. It currently sits above the level of surrounding roads, houses and rail sides.		
HopCroft Neighbourhood Forum	3	LWA 01	Clause J states: "*The Council has prepared evidence base documents and planning guidance to assist with understanding of the distinctive characteristics of the neighbourhoods and places within the West Area, and to help ensure coordination in the delivery of new …*" Where is this? How does it reference the non designated heritage areas and the cutting of special local landscape character?	The Council has prepared a number of studies to inform the preparation of the Local Plan, including the Lewisham Characterisation Study, Open Space Assessment and Sites of Importance for Nature Conservation (SINC) review. These are available on the Council's planning webpages.	No change.
Sydenham Society	3	LWA 01	**LWA1 West Area Place Principles** (p737) **Comment:** These are supported	Support noted.	No change.
Telegraph Hill Society	3	LWA 01	If the current the split of the Telegraph Hill Conservation Area between North and West Areas is to continue, then it is important that the policies here are consistent, as far as the Telegraph Hill Conservation Area is concerned, with those of the West Area. In particular, the following policies are equally applicable to the North Area part of Telegraph Hill as they are to the West Area part. LWA1.B "Development proposals must respond positively to the character of established residential areas. This includes the historic character of the area's neighbourhoods, and particularly their town centres which are defined by their Victorian shopping parades and make an important contribution to local distinctiveness." LWA1.J Small site guidance generally. It would be wholly illogical to apply different policies to differing parts of the Telegraph Hill Conservation Area merely because they have been arbitrarily assigned to different Areas despite identical characterisations. It should also be considered that similar policies should apply to the Hatcham Conservation Area whose characteristics are similar to those of Telegraph Hill and Brockley. 243. An SPD or design guide on the Haberdashers' Estate (incorporating both the Telegraph Hill and Hatcham Park Conservation Areas) should be produced in order to ensure that this consistency of approach is not lost by virtue of the arbitrary North/West split. We would be very happy to work with the Council on an SPD or design code covering Telegraph Hill and have details of window designs, paths,	Noted. The character areas or sub-areas in the Local Plan were informed by the Lewisham Characterisation Study, and provide a helpful means of providing policies at a more granular or neighbourhood area (rather than borough-wide) level. The Local Plan must be read as a whole for planning decisions, which is clearly stated in Part 1 of the plan. It should be noted that the Local Plan Part 2 Policies on Heritage are borough-wide policies including for Conservation Areas. These will help to ensure consistency of approach in planning decisions for CAs. The Council will consider the preparation of future SPDs to support the implementation of the Local Plan, taking into account resources available and key priorities areas to support the delivery of the spatial strategy. For Conservation Areas, the Council has and will continue to prepare a suite of Area Appraisals which provide additional guidance.	No change.

			ironwork, original ornamentation, materials and similar considerations already available. 244. For our comment on § 15.59, see paragraph 234 above.		
Tewkesbury Lodge Estate Residents Association	3	LWA 01	We welcome the recognition of the woodland heritage that is highlighted in Lewisham's Plan for its West Area (The Lewisham Plan page 733) , and we are glad that proposals for development will be expected to "integrate urban greening to respond to and to connect with the remnants of the woodland" (I.e. the Great North Wood (The Lewisham Plan p 737)	Support noted.	No change.
	3	LWA 01	**Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below. (LWA1 West Area Place Principles)** The suggestion the A205 will become a 'healthy street' is just not plausible. Lewisham Council have already admitted the South Circular on the station approach @ Forest Hill will get worse in October when low emissions zone extended as it's not included. Additionally, if you do nothing to divert the traffic at the blind bend where traffic is invariably queuing due to the traffic lights, this congestion will increase & traffic pollution will get worse not better. If Perry Vale is pedestrianized, the traffic will just be pushed on to the A205. How can that be a healthy street?	Whilst recognising the extent of the current ULEZ, the Council's position is that this should be extended beyond the South Circular and it will continue to lobby the Greater London Authority and Transport for London for this. The Local Plan seeks to give effect to the London Plan Healthy Streets Approach, including on the A205, however it is recognised the wording around this could be made clearer. The Council will continue to engage with GLA/TfL to deliver improvements to the environment and access around the junction at Forest Hill station, and along the A205, taking into account the feasibility and scope for measures on the major London roads. Even smaller measures using the Healthy Streets approach can have beneficial impacts on human health and the environment.	Local Plan amended to clarify terminology on the objective and principles to transform the A205 using the Healthy Streets Approach.
Discourse Architecture	3	LWA 01	*6. Enable the delivery of new workspace and housing along with enhancements to the Forest Hill station approach through the renewal of industrial land at Perry Vale and Clyde Vale, as well as the redevelopment of sites around the station. (p737)* Comment: Forest Hill station and its environs are currently under-developed and unattractive, with poor quality public spaces. The enhancement to the Forest Hill Station approach is supported. However, the reliance on piecemeal development of the key central sites will fail to deliver the comprehensive redevelopment required to deliver a high-quality public realm and regeneration of the town centre. The fundamental problem that hinders positive urban development in Forest Hill, as well as much of the Borough, is that inherited road and rail infrastructure forms a physical barrier to movement by vehicles and pedestrians, dividing the area. The current quality of this environment is poor, and a bolder approach is required to deliver the aspirations of local people, the Mayor of London's Healthy Streets initiative and the Mayor's New Plan for London.	We understand the concern regarding piecemeal development and would require a comprehensive masterplan to be prepared as part of any application coming forward. We acknowledge the issue of traffic through Forest Hill and will work with TFL to see how improvements can be made.	No change.

			The compartmentalized nature of sites around the station is a consequence of these barriers. A masterplan has been commissioned by the Council for Bell Green and Lower Sydenham, which is comprised of neighbouring sites under different ownership or tenure. The fragmented character of the sites around Forest Hill station makes the need for a coordinated vision for redevelopment more compelling. Without a Council commissioned urban plan, the challenge of creating transformative connections across the current road and rail barriers can never be adequately met. The local plan should require that a masterplan is developed building on the vision of the Forest Hill Society and Discourse Architecture proposals. A masterplan for the town centre could capitalize on the high footfall to the station and promote mixed use densification of the site appropriate to its location. Without a governing vision for the area, piecemeal development will continue to be unsatisfactory and fail to deliver the economic and social potential that local people demand. The local plan should be ensuring that development is within a framework that benefits local people. Failing the commission of a masterplan for the town centre, the Discourse Architecture / Forest Hill Society masterplan should be adopted as Supplementary Design Guidance for the future development. Following the issue of the New Mayor's Plan for London and consultation with Lewisham Planners, TFL and Network Rail, the DA/Forest Hill Society masterplan should be updated to include increased density of development and the redevelopment of the station on its existing site, rather than on the adjoining site.		
Forest Hill Society	3	LWA 03	**Cultural Heritage Issues** Commentary on Chapter 18 – Lewisham's West Area **LWA3 – A** The Forest Hill Society supports the Lewisham Plan the following: "Development proposals should contribute to securing the long-term vitality and viability of Forest Hill district town centre by enhancing the place qualities of the centre and its surrounds, as well as reinforcing its role as a key focal point for commercial, cultural and community activity." As a district town centre within Lewisham, Forest Hill is an economic engine for growth, prosperity and jobs for the wider community. The town centre offers a mix of high street shops interspersed with a number of independent retailers, many based around both lifestyle and culture. The area attracts a range of businesses. The area's attraction extends into the evenings with a range of restaurants and pubs attracting visitors from across the Borough and neighbouring areas in Southwark and Bromley. This in turn attracts residents who benefit from this range of local business and services as well as fast access to central London.	Support noted.	No change.
Forest Hill Society	3	LWA 03	LWA – C The Forest Hill Society supports the proposal that:	Support noted.	No change.

			"Development proposals must contribute to enhancing the public realm in order to promote walking and cycling, as well as to make the town centre a significantly more accessible, safer and attractive environment." The continuing success of Forest Town Hill as a district town centre, cultural quarter and area of local significance of night-time economic activity is at risk due to poor access for pedestrians in the surrounding road layouts and with access to and from the rail station. Therefore, we would invite the Council to give immediate consideration to those movements along main routes and station approaches within the responsibility of Lewisham Council and key transport partners Network Rail and TfL. This includes: ● Improving the pedestrian crossing at the junctions of the South Circular, Dartmouth Road and Devonshire Road. ● Improving the access to Forest Hill Station on the east side/Perry Vale entrance. This is wholly unsuitable for users with mobility issues or for families with small children or infants. ● Improving accessibility to the underpass connecting the existing town centre to Perry Vale shops and parking. ● Install a suitable pedestrian crossing at, or very near to the Perry Vale entrance of the station to cross Perry Vale. ● Cycle access on north/south and east/west routes into Forest Hill town centre. ● Improving the public realm.	We will pass your more detail transport comments onto our Transport team.	
Forest Hill Society	3	LWA 03 LWA SA 05 LWA SA 06 LWA SA 10 LWA SA 11	**Forest Hill Station & Town Centre Master Plan: Objectives and Aspirations: Areas 5, 6, 10 & 11** This addresses *LWA3 Forest Hill district town centre and surrounds* and the site allocations defined for *Lewisham's West Area.* Specifically, for Site Allocations 5, 6, 10 and 11, while proposed as separate site allocations, we feel it important these should be developed with a single vision as these sites are interconnected particularly as part of the district town centre. 1. A proposal characterised by, "***We have a once in a 100 years' opportunity to shape the centre of Forest Hill, reflecting the needs and aspirations of people that live and work in the area.***" 2. A significant opportunity for Public Realm visual enhancement that enhances and highlights the approaches to Forest Hill station on both the east and west side. 3. Develop transport links for the town centre and improve connections across the existing disparate parts of the centre. This should include enhancement to cycle routes with upgrades to the existing Sydenham Park footbridge and potential for examining the feasibility of an additional footbridge that will serve as a link between the Perry Vale car park and Dartmouth Road/London Road to provide a safer, more accessible and friendly access to Forest Hill Pools and the introduction of improved bus services that will enhance the visitor access experience to the Town Centre.	Whilst the Local Plan is a strategic policy document we have included design requirements and guidelines to guide development proposals coming forward. We accept that a masterplan for Forest Hill and indeed a number of other locations within the borough which are accommodating significant levels of growth would be beneficial. The Council has limited resources and capacity at present but will continue to review this situation.	No change.

			4. Redevelop the station building and expand its footprint with reprovision of retail and commercial space and upgrade the station to step-free level access for all platforms. 5. Improve the station forecourt combined with a radical new layout of the Dartmouth Road/London Road/Devonshire Road junction and pedestrian crossing inclusive of the removal of the buildings containing WH Smiths, the bookmaker premises and the dental surgery with businesses being reprovisioned within the station redevelopment. 6. Create a new level-access entrance to the station in the Perry Vale car park. 7. Transfer dedicated parking for the station from the station forecourt to the Perry Vale car park. 8. Introduce the opportunity to provide an estimated equivalent of up to 400 new housing units that are sensitively sited and of high-quality design. These numbers align well with the LLP's estimates for the West Site Allocations 5. Station West (86), 6. Clyde Vale (15), 10. Station East (41) and 11. Perry Vale (122) which estimated close to 300 expected units. 9. Introduce an estimated 3,062 m² (sqm) commercial floor space with an equivalent volume of 9,291 m3 (cubm). 10. Upgrade the existing car park on Perry Vale to conform to ACPO and Home Office Scientific Development Branch standards for a secure car park status with good quality design, improved lighting, controlled access and CCTV coverage. 11. Introduce measures supported by policy to install rapid-charge points for EVs in Perry Vale carpark and other publicly owned car parks. 12. Develop proposals that enhance connections from the Perry Vale side of the station to the town centre redevelopment along with the introduction of significantly elevated measures for greening (trees and shrubbery in particular) in keeping with several other principles defined in the Local Plan.		
Forest Hill Society	3	LWA 03	**LWA3 – B** The Forest Hill Society fully supports the proposal to designate the town centre as a cultural quarter and as an area of local significance of night-time economic activity, in line with Policy EC18 (culture and night-time economy). While the plan focuses on the twin anchors of the Horniman Museum and Havelock Walk, the area has additional attributes that add value to this designation and should be considered towards this. ● Heritage and culture are interlinked, and the area includes several conservation areas including Forest Hill in the town centre and Perry Vale and the Christmas Estate adjacent to the town centre. ● The area includes exceptional Victorian and Edwardian architecture including on Dartmouth Road Louise House, the community-run Forest Hill Library, Forest Hill Pools and Holy Trinity Church of England Primary School (all listed buildings).	Noted. This is too detailed for the Local Plan but could feed into any Cultural strategy or masterplan for the area.	No change.

			● Efforts should be made to identify further buildings which contribute to Forest Hill's cultural heritage and support the night-time economy. This may include special designation for pubs that lie in the district town centre. ● Retail operations in Forest Hill reflect the cultural mix of Forest Hill with stores based on art, crafts, music and heritage goods (antiques). ● The town centre benefits from a wide range of restaurants and pubs, which cater for a wide range of demographics both within Forest Hill and Lewisham and to visitors who will come to the area for its cultural activities. ● Outdoor leisure activity is also offered in and adjacent to the town centre with the Forest Hill Pools, Albion Millennium Green, Horniman Gardens and Sydenham Hill Wood. All of these offers links to both the areas heritage and cultural history of Forest Hill.		
Sydenham Society	3	LWA 04	**LWA4 West Lewisham Links** (p747) **Comment:** These are supported	Support noted.	No change.
Forest Hill Society	3	LWA Key spatial objectives	The Society fully supports the above noted Spatial Objectives 2, 4, 6 and 9. Though to achieve Objective 4, there are necessary and significant alterations needed to pedestrian movement around the Town Centre. This includes improving the existing poor access for pedestrians in the surrounding road layout and to and from the rail station. Rectifying this would contribute to the areas' place as a Community Hub, plus development of commercial and employment opportunities. We invite the Council to acknowledge that adoption of the Forest Hill Station and Town Centre Master Plan (Master Plan) will constitute a major contribution to workspace and housing creation in Forest Hill. The Master Plan was created through a community consultation and carries significant community endorsement. It warrants adoption into the Lewisham Local Plan. In line with Objective 9, the Society is strongly committed to both Environment and Greening issues. We recommend the Council include additional opportunities for local engagement in the identification of designation of new Local Green Spaces. This will deliver both short and medium term successes culminating in both walking and cycling improvements that will be made more enjoyable for residents and visitors.	Support noted. The Local Plan sets out the Council's strategic framework to facilitate Good Growth within and around Forest Hill. Officers have reviewed the community-led masterplan, and consider that the Local Plan reflects the broad aims and principles of this. However it is recognised that there are feasibility and financial viability issues which may preclude or complicate the delivery of some elements of the masterplan (for example, those dealing with strategic infrastructure such as the A205 and Forest Hill Station / station approach), and they have not therefore been incorporated into the Local Plan. Following the Regulation 18 consultation, the Council has prepared additional evidence base studies on Open Space taking into account feedback received. The Local Plan also encourages Neighbourhood Forums to identify new Local Green Space in neighbourhood plans.	No change.
Lewisham Cyclists	3	LWA Key spatial objectives	Page 735 Key Spatial Objective 8 in the main document refers to "Transform the South Circular (A205) and Brockley Rise / Brockley Road (B218) into 'healthy streets'" . We would suggest the wording of this is altered to "adopt the healthy streets approach along the South Circular (A205) and Brockley Rise / Brockley Road (B218) corridor" and encourage the planning team to follow TfL guidance on this which is clear and unequivocal. This should also form part of the strategic planning document for the whole corridor, and form conditions of planning along the	Noted. Local Plan Part 4 deals with funding and delivery and signposts that S106 may be used for Healthy Streets measures.	Local Plan amended to clarify terminology on the objective and principles to transform the A205 using the Healthy Streets Approach.

			corridor, including CIL contributions to part fund improvements.		
	3	LWA Key spatial objectives	**Lewisham West Area** Do you have any comments on the proposed key objectives? Three sites at Forest Hill seems excessive. The areas around here have shops yes, but there are residential flats above all of these as well as various existing flat conversions/apartment blocks, along Waldram Park Road/Crescent. The suggestion the area will also now be a 'night-time' hub is concerning to existing residents due to noisy pub goers making their way home. Pre-pandemic, we frequently had incidents of urinating in our apartment block's bin store and individuals trying to gain access to our flats (heavily intoxicated). A night-time hub is not wanted by residents. There are enough pubs/restaurants already.	Noted. The Council has undertaken numerous studies, including a Strategic Housing Land Availability Assessment, to identify sites suitable for development in order to meet the Borough's identified needs for housing and commercial space. The West Area of the Borough has a comparatively limited number of site allocations (potential development sites) and housing capacity when compared to other sub-areas, such as the North, Central and South. It is considered that the sites identified for Forest Hill are deliverable and will support the spatial strategy. The proposed designation of Forest Hill as an area of local significance for the evening and night-time economy both reflects and seeks to build on the town centre's existing character and function in supporting such complementary activities, and will help to support its long term vitality and viability. The Local Plan includes a refreshed suite of policies to help ensure that local amenity is protected.	No change.
Discourse Architecture	3	LWA Key spatial Objectives	Discourse Architecture prepared the 'Forest Hill Urban Renewal' masterplan for the centre of Forest Hill in consultation with the Forest Hill Society in 2017 18 LEWISHAM'S WEST AREA (p733) Key Spatial Objectives (p737) Comment: These are supported	Support noted.	No change.
Sydenham Society	3	LWA SA 09 LWA SA 12 LWA SA 13	**Site Allocations** (p751) *9 Willow Way LSIS* *12 Land at Sydenham Road and Loxley Close* *13 113-157 Sydenham Road* Development proposals for the above sites should be made within the context of a fully consulted-upon Masterplan and should conform to the design-led approach. Any future development on the site at 113-157 Sydenham Road should be very carefully considered, given the proximity of the locally listed Dolphin public house and garden. The principal current use of a car dealership affords an open aspect across this corner of Mayow Road and Sydenham Road with attractive views of the west-facing gable end of the pub. On the eastern side of the site, Berrymans Lane consists of a unique terrace of brick-built cottages which should be preserved.	The draft Local Plan sets a spatial planning framework the borough and West Area, which all development proposals on these sites will be required to respond positively to. The Regulation 18 stage consultation has provided the opportunity for the public to comment on the proposals for this spatial framework. The draft Local Plan Part 4 sets out that strategic site allocations should be accompanied by a site-wide masterplan, which supports the delivery of the spatial strategy. The Local Plan is clear that all new development must be delivered using the design-led approach. Site Allocation for 113-157 Sydenham Road includes development requirements for protecting the public house and its amenity.	113-157 Sydenham Road site allocation amended by referring to the gable end of the pub and the terrace on Berry Man's Lane.
	3	LWA SA 01	With regard to the proposals at 111-115 Endwell Road, I would repeat some of the above statements. The development of employment premises and homes on the Endwell Road/Brockley Cross Howarth Timber site should not add any traffic at all to the already congested junction at Brockley Cross. The development should be promoted as carbon neutral with access exclusively by public transport or non-carbon modes to meet the needs of the climate emergency we are now in. The buildings should	Noted. The Local Plan broadly seeks to promote modal shift away from private car use to movement by walking, cycling and use of public transport. Car parking provision on the site will be considered having regard to the maximum parking standards set by the London Plan. The Local Plan Part 2 policies on sustainable design and infrastructure set out requirements for minimising carbon emissions. The site allocation development guidelines refer to the	No change.

			be of a human scale to not greater height (2-3 storeys) to the nineteenth and twentieth century buildings on adjacent streets. Lewisham Gateway is a site of tall buildings; the Brockley Cross area must not be.	need for development to respond positively to the site surroundings, including established residential buildings.	
Forest Hill Society	3	LWA SA 03	**Site Allocation 3 Jenner Health Centre** We support the inclusion of this site as an area of opportunity, and we emphasise the need for appropriate re-provision of the existing health care facility on the same site. We also recommend that road access to parking for the health care facility be carefully considered. Current road access is inside the new ULEZ boundary. Future road access should be considered from Stanstead Road to not financially penalize patients who require vehicle transport.	Support noted. The site allocation for Health Centre will enable the facility to be reprovided at the current site as part of a new mixed-use development. Any proposal for off-site reprovision would only be considered where other Local Plan policies on community infrastructure are satisfied. Whilst recognising the extent of the current ULEZ, the Council's position is that this should be extended beyond the South Circular and it will continue to lobby the Greater London Authority and Transport for London for this. Additional requirements as suggested are considered to be inconsistent with this position. To avoid repetition and to aid implementation of Policy TR4, references to the level of car parking required have been removed.	No change.
HopCroft Neighbourhood Forum	3	LWA SA 03	We support recommendation for Jenner Health Centre development	Support noted.	No change.
NHS (HUDU)	3	LWA SA 03 LSA SA 05	We support the site allocations for Sydenham Green Group Practice and Jenner Health Centre. As the SELCCG and wide health sector review future needs in light of the challenges of the pandemic, the recently established Primary Care Networks and the South East London Integrated Care System (ISC) ongoing discussion with the Council as the local planning authority is welcomed. This will include identifying areas where additional or expanded capacity is required, and where existing facilities may need to change to provide modern affordable facilities.	Support noted. The Council has and will continue to engage with the NHS and other stakeholders to identify and plan for health care provision to meet local needs through the Infrastructure Delivery Plan, which sits alongside the Local Plan.	No change.
NHS Property Services	3	LWA SA 03 Call for sites	**Site Allocations** NHSPS is the freehold landowner of a number of health facilities in Lewisham. Discussions have previously taken place in support of the following draft site allocations: 3. Jenner Health Centre, 201-203 Stanstead Rd, London SE23 1HU A site submission was also made for South Lewisham Health Centre, 50 Conisborough Crescent, SE6 2SS, however no draft allocation appears for this site in the consultation document. Our representations review both sites in turn, taking account of proposed, and potential land use allocations.	We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.
NHS Property Services	3	LWA SA 03	**3. Jenner Health Centre** The draft allocation for Jenner Health Centre is for a comprehensive mixed-use redevelopment of the existing health centre with residential and community uses. NHSPS support this allocation in principle and wish to make the following comments.	Support for Jenner Health Centre site allocation noted. However, it is not considered necessary to amend the policy as suggested, as development proposals involving the redevelopment and rationalisation of the existing facility would also be considered against Policy CI1, which is referred in the development guidelines.	No change.

			Jenner Health Centre is an existing operational purpose-built health facility dating from the 1970s. The existing building occupying the site comprises c. 2,000 sqm GIA of Class E health centre space, formerly D1. There have been extensions to the original building occurring in the 1990's and the existing building is considered to be of no architectural merit. The facility is outdated and in need of investment to meet the level of patient care required, now, and in the future. While the site is well used, it is currently underutilised in terms of development capacity and represents a good opportunity to improve the public realm, while providing an intensified mixed-use health led development, and housing. The site itself is in the freehold ownership of NHSPS and we have been working to understand development potential in light of health care requirements. NHSPS therefore support the proposed allocation of this site in principle and given the context, close to the surrounding centres, there is potential to increase the existing land use density and height. This would make way for a high-quality building with a new health centre and much needed residential dwellings. The residential element of this site will allow for investment in the new healthcare buildings and services for the community. The current aspiration is to redevelop the existing healthcare facility, with enabling residential development funding new and improved healthcare facilities and the NHS requires that sufficient value be generated to do this. An assessment will be made to help establish a reasonable development quantum and type of development to ensure the NHS can deliver a new healthcare facility. The greater the sites development potential, the greater value can be derived for investment in essential health services. NHSPS therefore support the acknowledgement that this site can be intensified. In summary, NHSPS support the principle of the proposed redevelopment of the site and seek to ensure that the site is allocated within the New Local Plan. Whilst there is an active healthcare need and demand on this site, with plans progressing to improve facilities, the NHS does require flexibility in its estate. Therefore, to guarantee the allocation is sound, by being sufficiently flexible, the allocation should also allow for a residential use only, if the healthcare services can be re-provided elsewhere. Any relocation would involve improving services, potentially co-located/integrated with other uses and in a more accessible location in accordance with commissioning requirements. To achieve this, a suggested amendment is provided below:		

			Site allocation: Comprehensive mixed-use redevelopment of existing health centre with enabling residential ~~and community uses,~~ or residential only, if the existing services are relocated within an alternative healthcare facility in the wider area. Any relocation of services would need to be thoroughly assessed and ultimately approved by commissioners. This process would also be in accordance with Core Strategy Policies CS19 (Provision and maintenance of community and recreational facilities) and CS20 (Delivering educational achievements, healthcare provision and promoting healthy lifestyles). This would also correspond with the objectives of London Plan policies S1 (Developing London's social infrastructure) and S2 (Health and social care facilities) which seek to ensure enhanced and improved social infrastructure is delivered in London.		
	3	LWA SA 03	Unfortunately I can't make the zoom meeting tonight but I would like to know more about the planned development for The Jenner Health centre. It is in need of development and could provide a lot of homes. However, the site is very polluted because of the traffic junction at brocket rise/A205. I believe this area was responsible for the pollution that caused Ella Kissi Debrah's tragic death. Do you have monitoring at this site? What sort of housing is planned for the site? I heard it might be sheltered housing for vulnerable people who are most affected by air pollution. How will you protect them from high levels of air pollution? Will there be car park space for residents? How will you ensure the development doesn't contribute to raised air pollution levels here in the short and long term? During recent roadworks 19-22 Feb, traffic was diverted down St Germans road. It was interesting to see there was very little build up of traffic here as cars could access the A205 without queuing and homes are further away from the road here. Is there a way of diverting traffic from queueing at Brockley rise that wouldn't adversely affect air pollution on the alternative routes?	Noted. The Local Plan broadly seeks to promote modal shift away from private car use to movement by walking, cycling and use of public transport. This approach is set in the context of improving poor air quality, and the A205 is an Air Quality Management Area. Car parking provision on the site will be considered having regard to the maximum parking standards set by the London Plan and the Local Plan Policy TR4. The nature of housing provision, including tenure type and dwelling mix, will be considered at the planning application stage, having regard to the Local Plan Part 2 Housing policies. Traffic diversion schemes are beyond the scope of the Local Plan.	No change.
Discourse Architecture	3	LWA SA 3	Comment: We support the proposed redevelopment of the site to provide housing and re-provision of the health centre. Given the scale of existing buildings on Brockley Rise and St Germans Road, which is higher than on Stanstead Road, we would support a maximum height of development as follows: Stanstead Road: 3-4-storeys Brockley Rise: 3-4-storeys	Support noted. Following the Regulation 18 consultation, additional work on the Tall Buildings Study has been undertaken to inform the Local Plan policies on buildings heights.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.

			St Germans Road: 3-4-storeys We do not support higher development in the centre of the site		
	3	LWA SA 04	Regarding the above proposed development of up to 30 residential units, could you please indicate how any re-development might impact on the existing residents of the Havelock House estate. I realise that things are at a very early stage, but as a resident of Havelock House, I have some concerns as to how this might impact on the all the residents of Havelock House and its 2 other blocks on the estate. I look forward to hearing from you.	The site allocations has been removed from the Plan	Havelock House, Telecom Site and Willow Tree House site allocation has been removed from the Plan.
Forest Hill Society	3	LWA SA 04	**Site Allocation 4 Havelock House, Telecom Site and Willow Tree House, near Horniman Drive** We recognise that there is potential for development on this site but we have concerns about possible impact on existing trees and small woodland area at the rear of the site. Consideration should be given to additional TPOs on this site to recognise the importance of this site, while leaving other space for potential development.	Agree that redevelopment of the site would result in the loss of green infrastructure, so the site has been removed from the Plan	Havelock House, Telecom Site and Willow Tree House site allocation has been removed from the Plan.
Tewkesbury Lodge Estate Residents Association	3	LWA SA 04	We have carefully considered the proposal for "The Havelock House/Telecom Mast Site / Willow Tree House Site" but at present we feel that we must oppose it for the following reasons. We think that in its present form the proposal is contrary to many of the principles that are set out in the Council's Development Plan. 1. Green space. Within the Green Infrastructure (Section 10) section of the plan is the statement that "The Council will seek to deliver net gains in biodiversity (and support the London Plan to be 50% green by 2050". More specifically for the West Area, Point 9 of the objectives is to "Protect and enhance open and green spaces along with the distinctive woodland character of the area" . The proposed development of The Telecom Site will reduce the area of green space within the Borough by more than any other proposed site mentioned in the development plan for Lewisham West, and possibly by more than any other proposed site in the plan for the whole of Lewisham. 2. The Great North Wood. The Development Plan for the West Area makes welcome reference to remnants of the Great North Wood that can still be seen in Forest Hill (see paras 18.2, 18.8, 18.9, 18.13). These remnants form a wildlife corridor between Sydenham Woods and One Tree Hill, both of which are recognised as Nature Reserves in the London Borough of Southwark. The proposed development site is one of the best parts of the Great North Wood that we have in Forest Hill, and for that matter in Lewisham. The Council should make sure that it retains not only all the Oak trees on the skyline but also the other areas of natural woodland that lie below, between The Telecom Mast and both Willow Tree House and Havelock House. Wildlife habitats. On page 368 of the Plan is the statement in para 10:11 that "It is imperative	Agree that redevelopment of the site would result in the loss of green infrastructure, so the site has been removed from the Plan	Havelock House, Telecom Site and Willow Tree House site allocation has been removed from the Plan.

			that wildlife habitats are protected and appropriately managed so that their special biodiversity value is maintained and, ideally, improved over the long-term." The current wildlife value of the site is demonstrated by the following and recent observations. A pair of Peregrine Falcons bred there last summer. The Peregrine is at the top of the food chain, and "our" Peregrines would have preyed on small birds over the whole of the development site. A flock of 50 Redwing arrived from Scandinavia just before Christmas and 5 remained around the site until March. The site forms an important link in the wildlife corridor - see below. 3. Wildlife corridors. As described in paras 2 and 3 above, the Oak trees on the development site are part of a wildlife corridor which traces the course of the former Great North Wood from Sydenham Woods to One Tree hill. Woodland birds still migrate along this corridor. In Spring there are Chiffchaff, Willow Warblers and Blackcap (regularly), Buzzard and Red Kite (occasionally) and Hobby and Firecrest (rarely). In late Summer there are Chiffchaff, Willow Warblers and Garden Warblers (regularly) and Pied Flycatchers (rarely). In Winter there are Redwing (regularly) and Brambling, Siskin and Redpoll (rarely) 4.Biodiversity. Rare downland grasses, plants and invertebrates have been found on the nearby Honor Oak Road Reservoir Site, and a similar survey of the grassy slopes of the proposed development site would be prudent. We welcome the mention in the Plan of the need to survey all mature trees. However there are areas of hedge and scrub which add to the biodiversity of the site. For example they provide nesting sites for song birds which construct open nests, which are vulnerable to predation by squirrels and domestic cats. Blackbirds in particular have almost disappeared from our area. 5. Net gains in biodiversity. We recommend that additional native trees other than Oak be planted on the proposed development site, partly to shield existing residents from the sight of the two masts that are on the site, but also to increase biodiversity. This would support the Council in its Plan "to deliver net gains in biodiversity (and support the London Plan to be 50% green by 2050)". We are working with the Council to raise funds to plant native Hornbeam on the nearby Horniman Triangle to increase the biodiversity of our Great North Wood remnants: they are equally needed on the Telecom Site. Other concerns. As well as our concerns for the natural environment we also have the following concerns about the development of the site. 1. If the Telecom Mast is to be retained, then the recommendations of the Stewart Report should be		

			followed, and local accommodation should not be built in close proximity to the Mast. 2. Again if the Telecom Mast is to be retained, it would not be safe for a public footpath to pass close to such a potentially dangerous construction. 3. Also, if the Telecom mast is to be retained it will not be possible to accommodate 30 residential units without radically changing the character of the site. According to The Plan's map, there is insufficient space for the construction of the 30 additional homes that are described in the plan, if they are to be built in the style of buildings already on the site and around it. 4. Finally, the steep gradient of the site makes the creation of "the feel of a village green" (as described in the Plan) unrealistic. Conclusions We recognise that there is a pressing need for additional housing, and we know that the Council is obliged to meet the target of providing 1667 new homes every year. But the Council is also committed to "to deliver net gains in biodiversity (and support the London Plan to be 50% green by 2050)". On this site, which may be the greenest site in the Plan, we think that the needs of the environment should come first. For these reasons we urge the Council to remove the Telecom Mast, Willow Tree House and Havelock House from its Development Plan.		
Discourse Architecture	3	LWA SA 05 LWA SA 10	5 Land at Forest Hill Station west (Devonshire & Dartmouth Roads) (p760) 10 Land at Forest Hill Station East (Waldram Place and Perry Vale) (p771) Comments on Sites 5, 10 &Forest Hill Town Centre & Station Further to our comments above on Lewisham's West Area - Key Spatial Objectives (p735), this critical area within Forest Hill should be subject to a masterplan, not left for piecemeal development. The public realm in the town centre is currently not fit for purpose. The Local Plan should establish a framework for redevelopment that promotes high quality buildings and public space on both sides of the railway. Forest Hill is currently divided by the heavy traffic of the South Circular and the rail line. The Local Plan should address these issues, which have a negative impact on the lives of local people. The pedestrian routes under the line via the existing station underpass and Waldram Crescent pavement should be improved and made more accessible.	Where there has been no advanced pre-application discussions the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of both sites including the need for an appropriate a mix of employment and town centre uses at this district centre site, whilst introducing residential uses and creating a sense of arrival into the district centre. ~~-~~Based on these considerations, the residential units and emplpyment floorspace have been amended for Land at Forest Hill Station West whilst they have remained the same at Land at Forest Hill Station East. Optimal capacity for the sites will be established at planning application stage through a design led approach.	Land at Forest Hill Station West and Land at Forest Hill Station East site allocations amended by making reference to masterplanning and landowners working in partnership. Land at Forest Hill Station West site allocations amended by reducing residential to 80 units and increasing employment floorspace to 801m^2.

			A new footbridge over the line, between Perry Vale and Clyde Terrace, could connect the east and west sides of Forest Hill and potentially link the residents of Perry Vale Ward with Forest Hill Pools. Improved residential links would create a more favourable commercial environment for the shops and restaurants at the north end of Perry Vale, which is currently cut off from the centre of Forest Hill. We believe that the density of development, in particular residential accommodation, could be increased in line with the new Mayor's Plan for London and the Forest Hill Society / Discourse Architecture master plan for the town centre.		
	3	LWA SA 07 LWA SA 04	**Site Allocation: Featherstone Lodge, Eliot Bank and Havelock House, Telecom Site, Willow Tree House, Honor Oak Road** • Both these sites are along the ridge of the Great North Wood, and retain its basic natural features of mature trees with grassland. They are an important part of the green corridor from Sydenham Hill Woods to One Tree Hill and are rich in local fauna and flora. These must be retained and enhanced as part of any housing development plan, along with ways to make it an inviting place for residents as set out above. London Wildlife Trust is an expert in these woodland habitats as it has managed the Sydenham Hill Wood nature reserve since the 1980s, and has run the Great North Wood project for the past 4 years. This has done much to develop the sense of integrity and history of the area and its value to the natural environment. I would urge the Council to work with the Trust to establish firm ground rules for developers, for these and any other development proposals along the ridge**.**	Disagree, Featherstone Lodge site allocation provides a variety of references to mature trees, natural landscaping and a tree survey, in order to protect the natural setting of the site. Agree that significant redevelopment of the Havelock House site and grounds may result in the loss of green infrastructure, so the site has been removed from the Plan	Havelock House, Telecom Site and Willow Tree House site allocation has been removed from the Plan.
Sydenham Society	3	LWA SA 08 LWA SA 14 LWA SA 15	**Other sites listed**: the former Sydenham Police Station in Dartmouth Road, 74-78 Sydenham Road and 154-158 Sydenham Road are all in the process of being built out.	Agree that the Sydenahm Police Station site has been completed and that 154-158 Sydenham Road is nearing completion.	Sydenham Police Station and 154-158 Sydenham Road site allocations have been removed from the Plan.
	3	LWA SA 08	The Build at Site 8, The Former Sydenham Police Station of 33 units. This private development is virtually completed, I was surprised to find, having moved around the area very little during the Pandemic. What if any requirements were applied to the particular build by Lewisham Planning? What proportion of this private build is Affordable, what are the CIL costs payable to Lewisham Council and how will the CIL monies be used to contribute to improvements in infrastructure, environment or other local community improvements? The Build at Site 14, 154-160 Sydenham Road, another private development behind the main street frontages of 76 units near to Kent House Road. This is quite a large development. What, if any, requirements were applied to the particular build by Lewisham Planning? What proportion of this private build is Affordable, what are the CIL costs payable to Lewisham Council and how will the CIL monies be used to contribute to improvements in	Agree that the Sydenahm Police Station site has been completed and that 154-158 Sydenham Road is nearing completion.	Sydenham Police Station and 154-158 Sydenham Road site allocations have been removed from the Plan.

			infrastructure, environmental or any community improvements. Is any of this money available to local usage, as for instance you talk of improving frontages and many of the shop fronts in this area are shabby and need improvement, viability of businesses appears fragile?		
Forest Hill Society	3	LWA SA 09	**Site Allocation 9 Willow Way Locally Significant Industrial Site** We support the designation of Willow Way as a Locally Significant Industrial Site and believe that a combination of employment and residential uses is appropriate for the site. With careful development, there is the opportunity to ensure space for employment that fits with the nearby Forest Hill Cultural Quarter and supports the cultural and creative industries.	Support noted.	No change.
	3	LWA SA 09	I am writing to express my disapproval of the proposed development at the above site [Willow Way LSIS). There is a garage on this site, and car body shop, both of which I have used, in particular the garage and MOT Service centre. It has taken me 25 years of being a car owner to find a local garage which I trust, is female friendly (i.e., not patronising or scary) and does a great job at a reasonable price. This is an important local family run business that needs local support and has many loyal customers. I urge the council to rethink this proposal. The area already has empty flats on Kirkdale, we don't need more, but the local residents do need good local businesses in order to keep it flourishing	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	Willow Way LSIS site allocation has been amended to provide more certainty over the masterplan process, to give protection for the MOT centre and the amenity of the neighbouring public house.
	3	LWA SA 09	I. Views: It is a mistake to think that tall buildings can be built, say on the Sainsburys site, without obstructing the views from Telegraph Hill. That is where the real claustrophobia comes in. These views can never be replaced once gone. The example is the mess the city of London has made by totally allowing St Paul's cathedral to be obscured. It is so hard to see it now. This is vandalism. Certain cities like Paris have had the vision to see that these are immeasurably important assets. Panoramic views from Telegraph Hill fall in this bracket.	Noted. Following the Regulation 18 consultation, additional work on the Tall Buildings Study has been undertaken to inform the Local Plan policies on buildings heights. The London Plan sets out the London View Management Framework, which the Local Plan helps to give effect to – further details are set out in the Local Plan Part 2 policies on View Management.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
	3	LWA SA 09	This is to affirm my opposition to the proposal {Willow Way West] My home is in Taylor's Lane, a km away, and I have been a customer at Dartmouth Service Station for (I believe) twenty plus years. It is an excellent small business- the sort you should be encouraging to flourish- and I can assure you that it is highly regarded locally. The proposal would mean its closure, loss of employment and the loss of a valued local amenity. I hope that you will ensure its survival.	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	Willow Way LSIS site allocation has been amended to provide more certainty over the masterplan process, to give protection for the MOT centre and the amenity of the neighbouring public house.
	3	LWA SA 11	I am a resident in Brockley Cross and I believe the site used by Howarth (timber shop) in Brockley Cross is a great site to develop. Brockley station (1 minute walk, 10-20 minutes	Support noted. The site allocation mentions that employment floorspace must be re-provided but also states that uses must be sensitively integrated into	No change.

			into the City), three bus lines (171,172, 484), three primary schools and two secondary within walking distance (John Stainer, Haberdasher, Myatt...). Howarth brings a high number of HGVs in the area which cause a number of problems. They are oversized (and seem to get larger every year) compared to our small residential streets, struggle to manoeuvre and cause traffic, noise, vibration, pollution....	the development in order to ensure the protection of amenity for all site users	
Discourse Architecture	3	LWA SA 11	11 Perry Vale Locally Significant Industrial Site (p773) We question the designation of the narrow Perry Vale site as a 'Locally Significant Industrial Site'. If industrial use is retained at the south end of the site it will have negative consequences for the development of the site as a whole: • Access to the industrial area by trade and heavy vehicles will conflict with residential use in the narrow portion of the site • The future construction of a footbridge linking Perry Vale and the east side of the railway with Forest Hill Pools and Dartmouth Road will be obstructed. This link would meet the requirements of the Mayor's Healthy Street initiative to encourage more travel on foot or by bicycle. The Perry Vale site should be developed to a higher density, appropriate to its proximity to the adjacent public transport hub and town centre facilities, with co-location of residential and employment uses, rather than continuation of the existing occupation by single-storey commercial units and surface parking. This site could be viewed differently, as part of the proposed Forest Hill cultural hub. However, we accept that the current location of the post office sorting depot on the site is a valuable and convenient local amenity, albeit one potentially in conflict with mixed use densification of the site. We question the allocation of the Perry Vale site as a Locally Significant Industrial Site. The proximity of the site to the town centre and rail station differentiates this site from other sites identified for industrial development. The Perry Vale site is more suited for the co-location of residential accommodation and uses associated with the creative industries and the new Forest Hill cultural hub. There is also an opportunity to provide parking for visitors to the town centre who wish to engage in the cultural hub, night-time economy and swimming pool. Improving the connections across the railway, making them more attractive, accessible and safer will promote a balanced social and commercial environment across Forest Hill.	Noted. The designation of Perry Vale as an LSIS has been informed by recommendations of the Lewisham Employment Land Study, which reflects the importance of ensuring sufficient industrial land and capacity to meet the Borough's future needs. The Local Plan makes provision for employment-led mixed use redevelopment of the site in order to make the optimal use of land and improve its place qualities, including improvements to the station approach. The development guidelines encourage that employment uses complement the Forest Hill Cultural Quarter.	No change.
	3	LWA SA 12	**Site 12, Sydenham Road, Loxley Close**- possible 131 units. This is an area covered by a largish privately owned warehouse style Lidl Supermarket with a locally Listed building close by, which I assume is the Golden Lion Pub, and it is stated that any redevelopment or intensification, must not impact negatively on this public house. There is	The London Plan directs Local Authorities to allocate single storey retail stores and surface car-parks. The indicative site capacities have been derived from a standard methodology explained in the Site Allocations background Paper. The indicative capacity	Land at Sydenham Road and Loxley Close site allocation boundary amended to remove furniture shop.

			an old second hand furniture shop between. The supermarket is very popular with local families, as the prices are much lower than at other well-known local retail food suppliers like the mini Tesco and Sainsbury's. It seems doubtful that this privately owned business will come forward to develop in a manner that matches the style of local small retail businesses, housed in the traditional style higher up Sydenham Rd. There is a car park at the back which could be partially commandeered, but any build as proposed in the Local Plan, states that it should protect the amenity of nearby properties (like my own) with boundary landscaping, and I propose that it would be good to include a tree-filled greening of the ubiquitous tarmac. I would really support new and improved access to the allotments, as suggested, and that building heights are no higher than the 2 storeys of nearby homes. The Plan is positive, but to achieve it would appear to be quite a challenge.	also includes town centre uses which could be used to re-provide the supermarket.	
	3	LWA SA 13	**Site 13, 113-157 Sydenham Road** – possible 168 residential units. This site covers the area of a largish private car dealership and hire car and car storage showrooms and external space behind. Again this is a modern development with no connection with the traditional character of the area. It is important that any new development or intensification does not impact on the really popular and traditional Public House next door, The Dolphin which is Listed. The Plan is positive in that it recommends design in line with the Conservation area close by on the Thorpe Estate. Again, is the dealership really likely to come forward for redevelopment, even though the very strong intention of the Local Plan is for a change of the modal style, from car to walking and cycling?	Support noted.The London Plan directs Local Authorities to allocate single storey retail stores and surface car-parks such as those associated with car dealerships.	No change.
	3	LWA SA 14	The Build at Site 14, 154-160 Sydenham Road, another private development behind the main street frontages of 76 units near to Kent House Road. This is quite a large development. What, if any, requirements were applied to the particular build by Lewisham Planning? What proportion of this private build is Affordable, what are the CIL costs payable to Lewisham Council and how will the CIL monies be used to contribute to improvements in infrastructure, environmental or any community improvements. Is any of this money available to local usage, as for instance you talk of improving frontages and many of the shop fronts in this area are shabby and need improvement, viability of businesses appears fragile.	All details on the planning application can be found on the planning website using the reference number DC/17/104571. 154-158 Sydenham Road is nearing completion.	154-158 Sydenham Road site allocation has been removed from the Plan.
	3	LWA SA 15	**Site 15**, The prior **Supermarket** on the corner of Girton Road/Sydenham Road is now being transformed into a Pure Gym. Neighbours know that I am a Councillor and have told me they are upset by the fact that this Gym is being allowed to stay open all night. Girton is a quiet residential road full of families and a number of older residents who are not happy with this situation, fearing the potential for night disturbance and late parking in the road. In your site proposition, the Local Plan states that this site should take account of residential amenity, and that any build should be in alignment with the character of	The Local Plan is a 20 year strategy so whilst the site may not come forward in the immediate future we would hope it would come forward in the plan period.	No change.

			the area. In fact the building, a two storey modern smaller supermarket, has not been aligned with the local character since the 70s, and can only become so by being replaced altogether. The history is that the site was originally occupied by the Granada Cinema, opened 1931 and demolished 1971, a great building that was unfortunately not Listed and saved, as the Forest Hill Capitol Cinema building was. It is clear that the Gym is investing a lot in refurbishing the premises, and I assume will not be interested in discussing with Planning its demise and the quality rebuild envisaged by the Local Plan. There is therefore no financial CIL outcome and nearby residents are not content either. I invite your comment on this.		
	3	LWA Site Allocations	**Perry Vale/Land at Forest Hill Station West/Land at Forest Hill Station East** Do you have any comments on the proposed vision? The vision is flawed. The housing requirements has been based on data pre-pandemic and therefore needs to be reassessed based on the fact nearly 1million people leaving London to relocate due to flexible and smart working from home. More development in this densely populated area will increase emissions/pollution from traffic in area (Section of South Circular up to Forest Hill station with dangerous bend/poor access to Devonshire Road).	The latest evidence prepared by the GLA, which takes account of the impacts of Covid-19, suggests that there will continue to be significant population growth in London over the long-term, which will need to be considered through the plan process. The London Plan also sets a strategic housing requirement (target) for the borough that the Local Plan must meet. The Local Plan broadly seeks to promote modal shift away from private car use to movement by walking, cycling and use of public transport. This approach is set in the context of reducing carbon emissions and improving air quality.	No change.
Blackheath Society no 2	3	Section 13	**Table 13.1** contains net home units and gross floor space for site allocations by Area and is very important, both in demonstrating ambitions for housing, workspace and town centre uses by Area and the potential ability to meet the Borough's increased housing targets in the new London Plan. The North and Central Areas look set for most development, the West and East the least. Is this driven by genuine need and strategic intent or by what is possible given site allocation analysis? This split should be more prominent as it drives much of the Plan. It needs genuine exposure and buy-in from all stakeholders, especially neighbourhoods directly affected. It looks broadly realistic given the character analysis of the Areas but potentially controversial and contentious. Are the Community/Green Infrastructure and Transport policies well-matched to these ambitions, especially in the North and Central Area? Here the BLE brings no new stations, only upgraded interchanges.	Noted. The figures in Table 13.1 are based on the indicative site capacities for the site allocations included in the draft Local Plan. The site allocations were identified through a Strategic Housing Land Availability Assessment, and are considered to be deliverable within the plan period. Further details are set out in the Site Allocations Background Paper, which is available on the Council's local plan Evidence Base webpage. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.
Brockley Society	3	Section 13 Paragraph 13.5	Page 471, paragraph 13.5: As mentioned above, the Council's existing conservation area character appraisals and SPDs perform an important function in setting development standards that protect heritage assets. Any proposed additions, replacements or revisions should be publicly consulted on to ensure these standards are maintained and improved.	Noted. The Council's adopted Statement of Community Involvement sets out how the Council will engage with and consult the public on planning guidance documents.	No change.
Greater London Authority	3	Section 13	The Site Allocations are proposed to deliver 38,000 sqm net additional workspace and 24,000 sqm net additional town centre floorspace over the Plan period to 2040 (Table 13.1 of the draft Plan). Despite slightly different	Site allocations specify different floorspaces for employment and main town centre uses.	Table 13.1 amended to latest floorspace figures arising from the site allocations.

			terminology and timescales, this appears to exceed the additional space requirements identified in the borough's Employment and Retail Studies (21,800 sqm employment floorspace up to 2038 and 14,500 sqm indicative retail floorspace up to 2035). The London Office Policy Review 2017 identified a negative composite floorspace demand of -2,500 sqm for the borough up to 2041, and Lewisham town centre was identified as showing demand for existing office functions, generally within smaller units (Town Centre Network Office Guidelines C), but not for mixed-use or speculative office potential. The council will need to produce evidence of demand that justifies the proposed level of provision and/or create the right economic conditions for exceeding demand through an evidence-based economic development strategy. The Mayor would be particularly concerned if this would result in a loss of industrial capacity (see also section below). In this context it is also important to make a clear distinction between industrial space, and office and retail development	The floorspace figures are indicative, based on a theoretical land use mix split. The actual floorspace to be delivered on sites coming forward could differ from these estimates as they will be considered more thoroughly through the Development Management process. An additional supply of floorspace, above and beyond the requirements suggested in the Employment and Retail Studies, will enable sufficient non-residential floorspace to be delivered throughout the Plan period, should some of the sites not be brought forward for development or their delivery delayed.	
NHS (HUDU)	3	Section 13 Table 13.1	The housing figures set out in Table 13.1 'Site allocations – indicative delivery outcomes' shows substantial housing growth across the different neighbourhoods and places. It is essential that the local plan demonstrates how infrastructure capacity required to meet the growth in population will be delivered. New residents will place additional demands on health infrastructure (acute, mental health, community and primary care). While the health sector (SELCCG and the wider NHS) have provided evidence to the Council of projects required together with the substantial investment needed to bring existing infrastructure up to modern standards, there are additional challenges from Covid-19 and resultant pressures which will continue for many years	Noted. An Infrastructure Delivery Plan is being prepared alongside the Local Plan. This sets out the infrastructure required to support the levels of growth being planned for, including social infrastructure and community facilities. The IDP has informed the preparation of the Local Plan. The NHS has been consulted on the IDP and helped to inform its preparation. The IDP will be subject to regular review over the plan period, which will assist with the identification of new infrastructure and funding gaps/commitments as information becomes available.	No change.
Quaggy Waterway Action Group	3	Section 13	QWAG supports the Local Plan's aim to 13 *"Retain, reinforce and help shape the distinctive character and identity of Lewisham's communities and townscapes by ensuring that all new development responds positively to the special attributes of its local context – including the cultural, historic, built and natural environment - and is designed, constructed and maintained to a high quality standard."*	Support noted.	No change.
Quaggy Waterway Action Group	3	Section 13	The Local Plan should support local distinctiveness but too much development has been permitted which is not resonant of or reflective of the locality, and could be plonked down anywhere.	Noted. The need for new development to identify and respond positively to Lewisham's local distinctiveness is a recurrent theme set out throughout the Local Plan. Previous decisions on planning applications are outside the scope of the Local Plan.	No change.
Quaggy Waterway Action Group	3	Section 13	The opportunity to ensure that works to the rivers and their confluence in central Lewisham made the most of Lewisham being one of the few London boroughs with not one but two rivers flowing through the main urban centre, and with much of the borough's diverse population able to be involved and inspired by greater contacts with and knowledge of their local rivers.	Noted. Part 3 of the Local Plan makes clear that the river network is a defining feature of the Central Area and that development proposals should maximise the ecological function and character of waterways, including river restoration around Lewisham town centre. The plan's site allocations set out specific requirements in this respect.	No change.
Quaggy Waterway Action Group	3	Section 13	The Lewisham Gateway scheme has done the minimum possible with the rivers, which remain in concrete albeit with some artificially created meandering, riffles and flow, and the nearby small open space is of limited amenity and	Noted. Previous planning decisions are outside the scope of the Local Plan. It is considered that the draft Local Plan provides a clear direction and robust	No change.

			ecological value and does nothing to underpin local distinctiveness; the scheme happens to be in central Lewisham but it could be anywhere because it says nothing about the area.	policies for waterway management in the Borough, including within central Lewisham.	
Quaggy Waterway Action Group	3	Section 13	It remains unclear how the Local Plan will result in spaces and places which support and reinforce the borough's distinct environment, heritage and culture.	The draft Local Plan Policy QD1 requires that all new development must be delivered through the design-led approach, and informed by an understanding of the site's local context. This is an overarching policy, which other design policies emanate from. Part 3 of Local Plan set out policies and guidance which respond to the distinctive qualities of Lewisham's character areas and neighbourhoods. These were informed by the Lewisham Characterisation Study. Development proposals will be required to demonstrate how they satisfy the Local Plan requirements.	No change.
Historic England	3	Site allocations	The detail relating to design guidelines within site allocation policies as it relates to heritage assets and built character (although please see comments below in regard to tall buildings) is also welcomed. We do however have some comments in relation to specific sections.	Support noted. Responses to additional comments set out elsewhere in this consultation statement.	No change.
Historic England	3	Site allocations	As indicated above, we consider the design guidelines within the site allocations policies to be helpful both in their identification of relevant heritage assets and the design parameters set out intended to ensure the conservation of heritage significance. However, we also note that there is no reference to maximum building heights in any of the proposed site allocations within the zones identified as appropriate for tall buildings.	Noted. Following the Regulation 18 stage public consultation, the Council has commissioned additional work on the Tall Buildings study. This has been used to inform the Regulation 19 document, with further details on locations suitable for tall buildings and building heights. For planning decisions, the site allocations will need to be read in conjunction with other policies, including QD4 Building Heights.	Local Plan Policy QD4 amended with additional details on tall buildings locations and building heights.
London Borough of Bromley	3	Site allocations	With regard to the proposed site allocations, we have no specific comments but would welcome sites near the Borough boundary making explicit reference to this and the need to consider impacts on Bromley.	Noted. It is considered that the London Plan will help to ensure that developments appropriately consider and do not have an adverse impact on neighbouring boroughs.	No change.
NHS (HUDU)	3	Site allocations	The text within individual site allocations should make reference to mitigation of their impact on the borough's health infrastructure and contribute to expanding affordable and high quality capacity	The draft Local Plan Part 2 policy CI1 on Community Infrastructure requires development proposals to plan positively to meet identified need for community infrastructure having regard to the IDP, which would include health care provision. It is not considered necessary to repeat this policy in the site allocations. The plan must be read as a whole.	No change.
NHS (HUDU)	3	Site allocations	Within each site allocation under Development Requirements there should be reference to the need to mitigate the impact on health infrastructure.	The draft Local Plan Part 2 policy CI1 on Community Infrastructure requires development proposals to plan positively to meet identified need for community infrastructure having regard to the IDP, which would include health care provision. It is not considered necessary to repeat this policy in the site allocations. The plan must be read as a whole.	No change.
Royal Borough of Greenwich	3	Site allocations	In general, the site allocations should include more explicit guidelines or expectations in relation to building heights. This has particular relevance to sites close to or on the borough boundary, where tall buildings have the potential to impact the townscape and amenity of neighbourhoods within Royal Greenwich. We would also recommend that, where guidance around building heights and impacts on heritage assets is provided, this be moved from the "Development guidelines" section to the "Development	Noted. Following the Regulation 18 stage public consultation, the Council has commissioned additional work on the Tall Buildings study. This has been used to inform the Regulation 19 document, with further details on locations suitable for tall buildings and building heights. For planning decisions, the site allocations will need to be read in conjunction with other policies, including QD4 Building Heights.	Local Plan Policy QD4 amended with additional details on tall buildings locations and building heights.

			requirements" section to reflect the weight given to design and historic character in the NPPF.		
Sport England	3	Site allocations	<u>Site allocations</u> With regard to any future site allocations, we would advise that the allocation of new sites for sports facilities should be identified through the use of a robust and up to date evidence base such as the Lewisham Playing Pitch Strategy. Para 96 of NPPF and planned positively para 92 of NPPF to ensure that the right facilities are in the right place. It is also essential that where sites adjacent to playing fields are proposed to be redeveloped that the new use does not prejudice the use of the playing field (for example, due to ball strike).	Noted. The Local Plan has been informed by a technical evidence base, which includes The Lewisham Playing Pitch Strategy, Open Space Assessments and studies, and the Parks and Open Spaces Strategy.	Local Plan Policy Quality Design policy on amenity amended to reference that development does not prejudice the use of playing fields.
Thames Water Utilities Ltd	3	Site allocations	Table submitted which provides Thames Water's site specific comments from desktop assessments on water, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed development sites.	Noted.	Some amendments to sites allocations have been made in line with the comments provided in the table of sites.
Transport for London	3	Site allocations	Sites within PTAL 4-6 should be clearly identified as car-free per the London Plan policy T6. In many instances, the development guidelines under site allocations (even with PTAL 6b) specify – 'Car parking provision should be the minimum required to maintain the viability of the town centre, whilst also reflecting the Public Transport Accessibility Level'. This statement is not in compliance with the London Plan, nor does it align with our evidence which demonstrates that better public realm and increased walking and cycling contribute more to town centre viability than does access by car. In fact, car dominance detracts from the public realm and therefore it detracts from the viability of town centres. And it should be noted that people walking and cycling spend more on London's high streets than do people who arrive by car (http://content.tfl.gov.uk/mts-walking-action-plan.pdf). Recent Department for Transport evidence supports this, suggesting that increasing access by sustainable modes can be driven by reductions in town centre car parking (https://www.gov.uk/government/publications/switching-to-sustainable-transport-a-rapid-evidence-assessment).	Noted. The site allocations will be amended for conformity with the London Plan.	Local Plan policy TR4 amended to clarify that sites within PTAL 4-6 must be designed to be car-free. Local Plan site allocations amended by removing text on car parking that is not in general conformity with London Plan.
Transport for London	3	Policies Map	Big Yellow Storage, 155 Lewisham Way, New Cross, London SE14 6QP and Wearside Depot These sites are not identified as a site allocations, but are critical in delivery of the BLE. The formal safeguarding directions give a degree of protection to the sites. However, it is considered that identifying future uses of the sites through a site allocation, including for BLE infrastructure, would serve as to best protect the interests of the BLE, and new underground services to Lewisham.	Both sites are subject to safeguarding order which clearly identifies the sites.	Local plan amended to show the BLE safeguarded sites on the Regulation 19 policies map.

Lewisham Local Plan

Regulation 18 consultation statement

Appendix 2 – Regulation 18 Draft Local Plan Written Responses Split Part 4 and 5

September 2022

Organisation (if relevant)	Part	Section, policy or paragraph	Comment	Council officer response	Action
Telegraph Hill Society	4	DM	The Plan also needs to detail how the Council will enforce and monitor its own compliance with the Plan. In order to retain the trust of both residents and developers it is extremely important that the Council transparently upholds the principles it is espousing. At the macro level this involves setting and monitoring progress towards achieving a detailed series of targets, and the need for the introduction of these is set out in our opening paragraphs on the Vision (paragraphs 3 to 8). To have such a "Vision" is admirable and, as we have said, Lewisham's Vision is laudably aspirational but, unless the progress towards it is measured and failures to achieve it rectified, it is worth less than nothing. A Vision that is not adhered to will simply lower the opinion of the Council in the minds of residents, stakeholders and	Part 4 of the Local Plan sets out a monitoring framework with targets along with indicators to measure performance of the plan, which is divided in to thematic policy areas. Part 4 policies set out the framework for delivering the Local Plan. This sets out a range of measures and tools, and indicates that the Council will use planning enforcement where necessary. In line with planning law,	No change.

			potential partners and will lose general respect. At a more granular level we have numerous examples of where planning policies have been ignored by developers and planning applications not made where they were clearly required with no enforcement action apparently taken. We also have examples where planning decisions have been made which were clearly against explicit bars in the UDP (i.e. where the UDP says "The Council will not allow …" and yet the Council did so allow). Whilst we appreciate that the Council may not have the resources to follow up every infringement at present, that should not be expected to be the case throughout the life of the Plan, nor should any part of the "Vision" imply that such infringements might be allowed. To ensure the "Vision" succeeds, it needs to be enforced.	Part 1 of the Local Plan sets out that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise	

Culverley Green Residents Association	4	DM	**There are no success criteria** At the moment, there seems to be a single success criteria — a building target. If it is achieved it will be a hollow achievement if it results in no change in Lewisham's homelessness, or the flats are unoccupied investments, or the lack of green spaces and crowded transport means that the area is home only to the most economically disadvantaged. Targets could include reduction in homelessness, distance from green spaces, longevity of residency, etc.	Disagree. The Local Plan sets out Strategic Objectives across a range of policy topic areas. Part 4 of the plan also sets out the Monitoring Framework with metrics against which the successful delivery of the plan will be assessed.	The Part 4 monitoring framework has been reviewed and updated with additional indicators.
Deptford Society	4	DM	There is a general lack of quantifiable, verifiable targets against which the success or otherwise of policies can be judged. Ongoing issues with enforcement and maintenance of public space and heritage buildings continue to undermine delivery of attractive and welcoming public realm and shopping areas.	Disagree. The Local Plan sets out Strategic Objectives across a range of policy topic areas. Part 4 of the plan also sets out the Monitoring Framework with metrics against which the successful delivery of the	The Part 4 monitoring framework has been reviewed and updated with additional indicators.

			In Deptford High Street CA the following issues are particularly prevalent: - Graffiti - Increase in fly-tipping and litter - Maintenance of public open space - Maintenance of buildings and shop fronts	plan will be assessed. Planning enforcement is outside the scope of the Local Plan.	
Deptford Society	4	DM	Enforcement Effective enforcement of planning control would support the Lewisham Local Plan however the plan contains no mission statement or mandate in respect of enforcement. The concept of effective management control can very easily be undermined where enforcement procedures are ineffective or where enforcement procedures are drawn-out. For enforcement to be effective it needs to be made public and dealt with efficiently. We have examples of unresolved enforcement cases which go back almost a decade.	Noted. Planning enforcement is outside the scope of the Local Plan. However an additional policy point will be included to note that the Council will use planning enforcement as a tool to support the delivery of the plan.	Local Plan amended with an additional policy point in Part 4 on Delivery and Monitoring to reflect that the Council will use powers available to it, including planning enforcement, to support the delivery of the Local Plan.

			We have other examples of long-standing cases where in response to enforcement action, planning consents have been granted for reinstatements and/or alterations but where these works have not been carried out and the original offence remains. The longer that cases are left unaddressed, the stronger the perception becomes that there are no planning constraints within the Conservation Area. We are aware there are limited resources within the enforcement team and appreciate officers' efforts. LBL enforcement currently allocates cases according to 4 levels of priority. Priority 1 cases include: ‘works are being carried out which will cause irremediable harm, for example, works to a listed building, demolition of a listed building and works to trees with protection orders’		

			Priority 3 cases include: 'installation of shop fronts, unauthorised detached structure and non-compliance with the approved consent. Visits to be carried out within 10–15 working days' Unauthorised alterations to buildings within the conservation area are currently treated as priority 3 cases; in view of its 'at risk' status we recommend the council classify them as priority 1 and that this be stipulated in the local plan.		
Deptford Society	4	DM	We would like to see clearer wording to set out how statements will be used in determination of applications. A clearer identification of measurement or quantitative requirements which should be demonstrated through submitted statements would be helpful, and how this information will be used to monitor and enforce agreed obligations and the quality of developments.	The Planning and Compulsory Purchase Act 2004 provides that development proposals must be determined in accordance with the development plan, unless material considerations indicate otherwise. This is set out in Part	No change.

				1 of the Local Plan. Planning statements support applications to demonstrate how policy requirements will be satisfied. The Council uses planning enforcement powers to ensure that development is for authorised uses.	
Deptford Society	4	DM	The strategy to deliver and monitor the plan is lacking. Documenting how regular updates to the local plan will be made, to capture and respond to changing needs and circumstances, and to allow opportunity for further engagement and consultation on progress is needed to ensure the effectiveness of the plan is maximised and the plan can remain adaptive and relevant.	Part 4 of the Local Plan sets out the framework for monitoring and delivering the Local Plan, which the Council considers is proportionate and robust. The Council is legally required to review its	No change.

				Local Plan every 5 years and where necessary, update it to ensure it is in line with higher level planning policies. Where changes are proposed to be made, the Council will carry out consultation in accordance with its adopted Statement of Community Involvement.	
NHS (HUDU)	4	DM	The London Plan (March 2021) paragraph 11.1.37 states "Boroughs should use the London Healthy Urban Development Unit Planning Contributions Model (HUDU Model) to calculate the capital cost of the additional health facilities required to meet the increased demand". This should be reflected in the Local Plan, and set out in further detail in the updated Planning	Noted. The use of the HUDU model will be considered when the Council updates is Planning Obligations Supplementary Planning Document.	No change.

			Obligations SPD. We are keen to support the Council to use the HUDU Model and if the relevant officer makes contact this can be arranged.		
Blackheath Society no 2	4	DM 01	Not enough emphasis/detail on engaging/harnessing citizens and groups (DM1)	Noted. Policy DM1 sets out that a wide range of stakeholders, including community, groups will support the plan's delivery. However it is acknowledged some further details in the supporting text could be helpful. The Council's Statement of Community Involvement should also be referred for further information.	Policy DM1 supporting text updated to provide further details on how local communities will assist in delivering the Local Plan.
Blackheath Society no 2	4	DM 01	**DM1 Working with stakeholders to deliver the**	Noted. Policy DM1 sets out	Policy DM1 supporting text updated to provide further details on how local

			Local Plan. There is far too little detail on how these aspirations/promises will be met, given recent poor engagement with local stakeholders and the manifest lack of capacity to do so effectively in the face of recent budget cuts and covid. In particular, more imaginative and transparent ways of engaging stakeholders in a modern, fluid and fast moving society (including the Council itself) need to be developed and embedded in Council processes and attitudes. A great opportunity is being lost by not engaging more frequently and effectively in dialogue with local knowledge, experience, ideas and enthusiasm of local amenity societies and community groups. A defensive silo approach needs to be avoided and partnership working encouraged.	that a wide range of stakeholders, including community, groups will support the plan's delivery. However it is acknowledged some further details in the supporting text could be helpful. The Council's Statement of Community Involvement should also be referred for further information.	communities can assist in delivering the Local Plan.
Telegraph Hill Society	4	DM 01	As part of the delivery process and ensuring compliance with the principles in the Plan it is fundamental, as we have outlined above, for the	Noted. The preparation of design codes and planning guidance is	No change.

			Borough to commit to updating as soon as possible its guidance and detailed policies including Conservation Area Character Appraisals and to introduce design codes based on a more detailed understanding of each area. See our further references to this in paragraphs 60 131, 135, 142 and 258.	outside the scope of the Local Plan. However the Council has and will continue to prepare guidance to support the implementation of the Local Plan. The extent of guidance will be subject to resources available and priority of need for the information.	
Telegraph Hill Society	4	DM 01	There is very little in the Plan or the Vision which shows an on-going involvement with residents in what happens in the Borough once the final Plan is adopted. It is fundamental to good planning that local communities are involved, especially as such communities will evolve and change over the 40 year life of the Plan.	Noted. Policy DM1 sets out that a wide range of stakeholders, including community, groups will support the plan's delivery. However it is acknowledged some further details in the	Policy DM1 supporting text updated to provide further details on how local communities will assist in delivering the Local Plan.

				supporting text could be helpful. The Council's Statement of Community Involvement should also be referred for further information.	
Telegraph Hill Society	4	DM 01	Nor should relevant parts of any community be left out of consideration purely because of artificial boundaries drawn either for the purpose of this Plan or for electoral ward purposes. As Part Three of the Plan acknowledges, boundaries are blurred and developments in one area can affect easily affect others	Noted. The Council's Statement of Community Involvement sets out how it will consult the public on planning decisions.	No change.
Telegraph Hill Society	4	DM 01	Ward boundaries, in particular, do not relate to either character areas or neighbourhoods mapped out in figure 13.1. For example ¼ of Telegraph Hill is in the North Area and ¾ is in the West Area and yet it is all in Telegraph Hill Ward, which also includes	Noted. The character areas or sub-areas in the Local Plan were informed by the Lewisham Characterisatio n Study, and	No change.

			Honor Oak and the Kender Triangle. The Plan acknowledges that New Cross/New Cross Gate is the principal shopping centre for much of Telegraph Hill and the great majority of the Telegraph Hill Conservation Area and the community of people who live there will be affected by developments on the Hatcham Works site, but none of those people are in the New Cross Ward where Hatcham Works and the district shopping centre is located. We have argued in other submissions that the Ward boundaries are inappropriate for planning purposes and the split between the North and West Areas of the Plan make them even more so. It follows, therefore, that Local Ward Assemblies, for example, are an inappropriate vehicle for community engagement and new groupings, more in alignment to this Local Plan, need to be developed. The opportunity also seems to have been missed to align the Area	provide a helpful means of providing policies at a more granular or neighbourhood area (rather than borough-wide) level. The Local Plan must be read as a whole for planning decisions, which is clearly stated in Part 1 of the plan. It should be noted that the Local Plan Part 2 Policies on Heritage are borough-wide policies including for Conservation Areas. These will help to ensure consistency of approach in	

			boundaries with the four Neighbourhood Community Development Partnership areas used for health and social services planning.	planning decisions for CAs. The Council's Statement of Community Involvement sets out how the public will be consulted on planning decisions.	
Telegraph Hill Society	4	DM 01	We welcome the commitment by the Council in DM1.A to take a "proactive and positive approach" to working alongside community groups. In order to add some flesh to this otherwise bland statement, the Council should acknowledge that community groups do not have the resources, being volunteers, in the same way as either the Council or developers do. The planning process is therefore inherently biased and unfair and the Council should do all it can to ensure that any unfairness against local residents and community groups is removed as far as	The Council's Statement of Community Involvement sets out how the public will be consulted on planning decisions. Funding and support for community groups is outside the scope of the Local Plan.	No change.

			possible. There should therefore be firm commitments stated within the Plan that, when funds are available, the Council will: • re-introduce the Amenity Societies Panel (even just providing the relevant files for discussion and a space to meet would be beneficial all round) • provide resources to help communities understand planning issues and get involved in the planning processes at Local Plan, area plans, neighbourhood plan and site-specific planning levels and also in designing Character Appraisals and Design Codes to further inform future local development and • provide similar levels of assistance to community groups and concerned residents as are provided for developers in terms of seeking advice.		
Telegraph Hill Society	4	DM 01	We note that the wording of DM1.A which specifies "local communities and community groups" separately from "key stakeholders" suggests that local communities and	Agreed.	Local Plan policy DM1.A amended as suggested.

			community groups are not key stakeholders when, in fact, they are the primary interested parties in anything which affects their communities. We imagine this to be a drafting error and that the implication is not intended. We would suggest that this be re-written to read: “to working alongside key stakeholders, including local communities and community groups, key stakeholders, landowners and development industry partners, and the wider public”		
Telegraph Hill Society	4	DM 01	With reference to policies DM2.B and DM2.C we note that CIL money will be allocated “to help ensure local areas are appropriately supported with infrastructure and benefit from investment generated by new development”. This should also state that it will be allocated to ensure that local areas are compensated for any disadvantages that might accrue from new development. The Ward Assemblies, as we have pointed out above (paragraphs 260 to 263) do not	Planning obligations (S106 agreements) are legal obligations entered into to mitigate the impacts of a development proposal and the appropriate mechanism to ensure that development proposals are	No change.

			correspond with the areas affected by developments and therefore are not the appropriate forums in which to discuss allocation of CIL monies. DM2.B and DM2.C need to be re-written to ensure that all residents affected by developments have an equal say in the use of neighbourhood CIL.	acceptable in planning terms. The Council has established governance arrangements for the allocation and use of Neighbourhood CIL (NCIL). These are outside the scope of the Local Plan.	
Blackheath Society no 2	4	DM 02	**DM2 Infrastructure funding & planning obligations.** The Council's record on planning infrastructure improvements/upgrades to match the demands and timing of new developments has not been good. Nor has its record in raising, collecting and utilising S106 and CIL funds, many of which remain unspent. More specific proposals and targets are needed in the Plan, rather than just theory.	Noted. Whilst we accept that the spending of S106 funds could be better the Council has delivered significant infrastructure improvements including a programme of school improvements and extensions,	No change.

				improvements to parks and open spaces and securing public transport improvements such as the DLR upgrade. For further details on planning contributions spend please see the IFS on the Council website.	
Environment Agency	4	DM 02	**Infrastructure funding** Lewisham raises a Community Infrastructure Levy (CIL) and paragraph B of DM2 states that a portion of this will be allocated towards neighbourhood priorities to help ensure that local areas are appropriately supported with infrastructure. We would like to highlight the benefit of considering the funding of improving flood defences with CIL. Improvements to flood defences could be incorporated into projects to provide additional local outcomes, such	Noted. Policy DM2 sets out a list of areas where planning obligations may be sought, and this includes flood risk management. The Council has set governance arrangements for the allocation and use of Neighbourhood	No change.

			as the creation of parks and open spaces.	CIL. Proposals for projects involving flood risk management / improvements would be welcomed and will be considered through this process.	
Metropolitan Police Service	4	DM 02	**Section 106 / CIL contributions to mitigate impact on crime** Policy H01 (Meeting Lewisham's Housing Needs) of the emerging Lewisham Local Plan sets out that the Council will look to optimise the capacity of housing sites in order to ensure that *a. "The draft London Plan minimum ten-year target of 16,670 net housing completions over the period 2020 to 2030 (or 1,667 net completions per year) is met and exceeded; and* *b. That delivery against Lewisham's Local Housing Need figure is maximised."*	Noted. Policy DM2 sets out a list of areas where planning obligations may be sought, and this includes community safety measures. It is acknowledges that the draft IDP does not currently include a section on emergency services. The inclusion of this	Infrastructure Delivery Plan updated to include new section on emergency services.

			It goes on to state at paragraph 7.4 of the emerging Lewisham Local Plan that, *"It is imperative that we prepare Lewisham's new Local Plan having regard to the draft London Plan, including the borough-level housing targets, in order to ensure it aligns with the spatial development strategy for the region. At the same time, we must ensure that national planning policy requirements are satisfied. Through the Lewisham Strategic Housing Market Assessment (2019), we have calculated the Local Housing Need (LHN) figure for the Borough, in line with the NPPF. The SHMA indicates that the current position for the borough is a minimum housing need figure of 1,939 net units per year based on the 2016 London Plan target. The LHN figure is 2,334 net units based on the draft London Plan (Intend to Publish version) annual housing target of 1,667 units. These LHN figures are significantly higher than Lewisham's strategic housing*	in the IDP would support relevant CIL spend over the plan period on infrastructure required to support growth.	

			target set out in both the current and draft London Plan." In terms of employment in the Borough, Policy EC1 (A Thriving and Inclusive Local Economy) states that, *"The Council will help to build a thriving and inclusive local economy by attracting and generating inward investment".* The sub text to this Policy states that *"Helping to facilitate a thriving, diverse and inclusive local economy is one of our key priorities. This means growing and strengthening the local economic base, making available a wide range of job opportunities, workspaces and employment sites across the Borough."* Further, Policy EC2 (Protecting Employment Sites and Delivering New Workspace) sets out that, *"There is a forecast need for 21,800 square metres of net additional employment floorspace (Use Class B1) in the Borough up to 2038."* Growth in other land		

			uses such as retail and hotels is also expected. The growth in homes, offices and other uses will significantly increase the need for policing and the cost for associated infrastructure. This therefore represents a legitimate infrastructure requirement that should be accounted for.		
Metropolitan Police Service	4	DM 02 CI 01	Policy CI1 (Safeguarding and Securing Community Infrastructure) of the emerging Local Plan states that Lewisham Council will: "A. *The Council will work collaboratively with stakeholders to identify current and projected future requirements for community infrastructure, and to secure the necessary provision of this infrastructure. Need for provision in the Borough will be considered having regard to the Infrastructure Delivery Plan, along with the relevant corporate plans and strategies of its key stakeholders, including for healthcare,*	Noted. It is acknowledges that the draft IDP does not currently include a section on emergency services. The inclusion of this in the IDP would support relevant CIL spend over the plan period on infrastructure required to support growth.	Local Plan supporting text amended to refer to emergency services as part of community infrastructure. Infrastructure Delivery Plan updated to include new section on emergency services.

			education, recreational and other community services." The sub text to this Policy, at paragraph 9.1 sets out *that "Community infrastructure is also commonly referred to as social infrastructure. It covers a range of services and facilities that contribute towards inclusive and sustainable 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), places of faith, and sport and recreation facilities for people of all ages and abilities."* We highlight that both the emerging Lewisham Local Plan and Draft Infrastructure Delivery Plan (November 2020) do not make reference to either 'policing facilities' or 'emergency services' as a social and community infrastructure. The MPS have to move towards		

			securing S106/CIL from development due to the impacts on crime. The MPS would like to have the ability to receive financial contributions during Lewisham Council's New Local Plan period and are in the process of working up a formula linking to development impacts which should be available soon. A breakdown of non-property related infrastructure sought by the MPS in the future is detailed below. This list has been taken from other Police and Crime Commissioners who are already receiving financial contributions; **Staff set up costs** - Uniforms. - Radios. - Workstation/Office equipment. - Training. **Vehicles** - Patrol vehicles. - Police community support officers (PCSO) vehicles. - Bicycles.		

			Mobile IT: The provision of mobile IT capacity to enable officers to undertake tasks whilst out of the office in order to maintain a visible presence. **CCTV technologies:** Automatic Number Plate Recognition (ANPR) cameras to detect crime related vehicle movements.		
NHS Property Services	4	DM 02	**Policy DM2 Infrastructure funding and planning obligations** It is important that the Council maximises opportunities to use the Community Infrastructure Levy and/or planning obligations to secure healthcare infrastructure. Large residential developments often have very significant impacts in terms of the need for additional healthcare provision for future residents, meaning that planning obligations or financial contributions for new healthcare facilities are necessary. The requirement that London boroughs recognise the role large sites can play in delivering necessary health facilities is critical.	Noted. The Council recognises the importance of ensure the population benefits from access to high quality health and social care in Lewisham. The Local Plan sets the framework to ensure that new development is appropriately supported by such infrastructure.	No change.

			Similarly, cumulative development can place incremental pressure on health services and the Council should actively engage with the NHS to ensure an equitable share of Community Infrastructure Levy funding is secured for healthcare developments and services. NHSPS will be working with the Council and CCG to ensure such funding is made available. NHSPS are also aware that the Council currently has a Community Infrastructure Levy charge of £103.17 per sqm on 'all other uses'. NHSPS have previously raised concerns about this charge via the Councils consultation on its Preliminary Draft Charging Schedule, September 2018. Without further detail, it is assumed that 'all other uses' also includes the provision of new, publicly funded, healthcare buildings. It should be noted that healthcare uses do not	Part 4 of the Local Plan deals with delivery, including arrangements to secure infrastructure. Policy DM2 sets out a list of areas where planning obligations may be sought, and this includes social and community infrastructure. The Infrastructure Delivery Plan also includes a section on health and care facilities, which will provide a link to relevant CIL spend over the plan period. The CIL Charging Schedule and CIL Rates are	

			generally accommodate revenue-generating operations and have operating costs that are often higher than the income they receive. They therefore require public subsidy and many of these developments will also be infrastructure themselves, which the Community Infrastructure Levy may be required to fund. Therefore, the Councils Charging Schedule should have a nil rate on healthcare buildings, as any charge could prevent the ability of the NHS to deliver the new infrastructure that is required to support Lewisham's aspirations for growth within the Plan. We would therefore request that both healthcare floorspace and any developments involving the NHS Estate should, without exception, be attributed at zero rate on the Charging Schedule.	outside the scope of the Local Plan.	

Port of London Authority	4	DM 02	**14. Policy DM2: Infrastructure funding and planning obligations.** Support the policy but consider that the list of areas where planning obligations may be sought, highlighted in part E is amended to include green **and blue** infrastructure, to emphasise the importance of the boroughs various waterways.	Noted.	Local Plan amended to refer green and blue infrastructure in list of planning obligations, as suggested.
Transport for London	4	DM 02	Part E lists a number of issues that may be addressed through planning obligations, however, there is currently no indication of their priority should financial viability issues arise. Part E should be amended to make it clear that affordable housing and transport infrastructure share equal highest priority, as set out in the London Plan. With the changes to the CIL Regulations (2010) last year, there is now greater flexibility in terms of how CIL and s106 work together and fund infrastructure. This requires a certain level of detail to understand what infrastructure is intended to be funded	Noted. Local Plan DM02 supporting text makes clear that affordable housing and transport infrastructure share equal highest priority in accordance with the London Plan. Local Plan amended to include formulaic	Local Plan amended to include formulaic approaches to calculating planning contributions, where appropriate, informed by Viability Assessment Update.

			through CIL and which is to be funded through s106, or indeed a combination of the two. Recent changes in government guidance now also require that any formulaic approach to s106 obligations is set out in the local plan, and as the previous Lewisham Planning Obligations SPD was adopted in 2015, you may wish to consider the obligations that could be addressed through a standard calculation or tariff-based approach and clearly set those out within the new local plan. You may also consider updating the Planning Obligations SPD in parallel with the local plan process to ensure that the Borough's approach to developer contributions is clear.	approaches to calculating planning contributions, where appropriate. The council envisages commencing work on an update to the Planning Obligations SPD as the local plan progresses towards adoption.	
Transport for London	4	DM 02	Whilst DM2 references planning obligations in connection with public transport improvements, it should explicitly reference the BLE. It remains TfL's view that it would be advantageous for the Borough to commit to identifying how planning obligations can support the	No decision has been made on this issues so this would be premature to include within the Local Plan.	No change.

			funding of the BLE, as there will be an expectation that significant developer contributions would be needed with the possibility of other Borough funding avenues. Using a dedicated proportion of CIL, or other levy could alleviate uncertainty for developers as to the obligations required, and reflect the relationship between the BLE and its role in unlocking developments in Lewisham. Currently, there is no formula set out as to how contributions could be calculated. Consideration of a formula/mechanism should be developed to capture monies or land needed for the BLE. Furthermore, we ask land to be safeguarded and routes provided to and from stations.		
Blackheath Society no 2	4	DM 03	**DM3 Masterplans and comprehensive development**. Masterplans need to cover broader areas, not just individual sites, so that there is more strategic, coordinated and holistic planning for areas, rather than competitive, defensive focus on individual	Noted. The Local Plan sets out the spatial strategy for the Borough, which will help to ensure a coordinated approach to	No change.

			sites that causes escalation of height, density, style etc. through precedent, plus a lack of sharing of the costs of amenity improvements and a hotchpotch result. Lewisham town centre is a prime example of failure over the past 10 years, Blackheath Hill is a very recent emerging example, and Lee Green looks to be in danger of a repeat of this trend.	managing growth and development, along with new investment. The Council has, and may in the future, prepare area-based frameworks where significant growth is planned and it considers additional guidance is necessary. Site masterplans are an important tool used to support planning applications, and to demonstrate how development proposals will support the delivery of the spatial strategy.	

NHS (HUDU)	4	DM 03	**DM3 Infrastructure funding and planning obligations** The wording of clause D 'having regard to the policy requirements of the statutory Development Plan' makes it essential that the individual polices including site allocations refer to the requirement to expand health infrastructure capacity for the plan to positively meet the housing and population growth it sets out. Paragraph 19.12 refers to a new SPD Planning Obligations being published. We look forward to working with the Council to reference and implement the NHS HUDU Planning Obligations Model as required by the London Plan.	Noted. The requirement for development proposals to plan positively for and support the delivery of community infrastructure is set out in draft Local Plan Part 2 policy CI1 Safeguarding and securing community infrastructure. The Council will engage with the NHS on the preparation of any future review and update to its Planning Obligations Guidance SPD.	Noted.
	4	DM 05	A true 'vision' for the future is what is needed, one that accepts the effects of COVID-19 and Brexit, neither of which have fed into this strategic document. We would therefore	Noted.	

			welcome a more flexible and evolving set of strategies that could be reviewed as the effects from these on the built environment, the economy and the community are felt, understood and, as the report suggested, be ready to respond to changes in wider planning context. A more agile and flexible standpoint is needed. We would welcome a commitment to reviewing the Local Plan periodically to ensure targets are set, being reached and objectives respond to the changing and evolving needs of the borough.		
Blackheath Society no 2	4	DM 05 Table 19.1	**Table 19.1**: Monitoring framework. Some targets seem very unambitious and occasionally complacent/unrealistic/unclear: **LP15 Cultural infrastructure (venues & facilities).** Unambitious given focus on culture and creativity. No list of such venues/facilities. Specific problem of facilities just across borough border (e.g. Blackheath Halls, Blackheath Conservatoire, Age Exchange	LP16 – We have strengthened our pubs policy to try and resist there redevelopment. LP17 – We have corresponded with our community's team regarding community infrastructure –	Noted

			and its library, which are all in RBG but serve many Lewisham borough residents). How to measure: each venue not of equal value. Realistic? **LP16 Public houses.** No net loss. Unrealistic if for continuing in use as pubs, which are closing nationwide due to changing lifestyles. Need to retain and support good neighbourhood pubs or repurpose if heritage buildings. **LP17 Community infrastructure**. No net loss. Unambitious given forecast growth in population and new housing. Particularly important to retain and expand in areas of intense development, especially North and Central Areas. **LP18 Open space**. No net loss (designated). Unambitious, especially in the face of a rising population, lessons learned from covid about the importance of good quality and safe open space. And specifically green space? Is there a baseline for this, split between public and private (including gardens)? This needs	No further need was identified.	

			protecting and expanding, for reasons of health, well-being and carbon reduction, as well as to contribute to the Mayor's ambition of a green city (>50% overall). **LPxx**. No targets on **capital spending** (including CIL) on **basic infrastructure to support new housing and other development**. **LP25-27 Housing & Workspace**. What does 'in the character area' mean? Does it mean in each/all five character areas? If so, it is too vague, untargeted and uncalibrated. If not, it should specify by area, as in Table 13.1 on page 473		
Blackheath Society no 2	4	DM 05	**DM5 Monitoring and review**. Need to be careful of planning decisions driven by targets creating perverse incentives. Need to be realistic about timescale. Need targets for each 5 years of Plan's 20 years (as well as routine annual reporting monitoring review), then formal review, evaluation and change where needed. D Welcome focus on viability review regarding land values but other things will change	Noted	DM5 amended to include 5 year review in line with the NPPF.

			e.g. population growth; retail habits; relative values of residential, commercial etc. use; impact of big transport infrastructure changes; etc.		
Deptford Society	4	DM 05 Table 19.1	**Page 805**, table 19.1 (LPIs) LPI18 - open space. We consider 'no net loss' to be a poor aspiration and would encourage the council to set a target to increase the amount of open space. Does the definition of 'open space' mean space that is publicly accessible? If not, a distinction should be made in any monitoring figures between the two.	Disagree. Draft Local Plan monitor LPI18 is considered appropriate given the Local Plan objectives to protect open space. This will also help to support implementation and review of policies concerning acceptable loss of open space. However it is recognised that further monitors in the green infrastructure section could be added.	Local Plan Policy GR2 amended to make clear distinction between open and green spaces. Further monitors in the green infrastructure section added to monitoring framework.
Deptford Society	4	DM 05 Table 19.1	**Page 805**, table 19.1 (LPIs) LPI21 Air quality. Likewise we consider the LPI relating to air	Noted.	Further monitor on air quality added to monitoring framework, focussed on achievement of air quality objectives.

			quality to be extremely unimaginative. It does nothing to drive improvements to the borough's existing air quality, which in some places (especially around the main roads in Deptford and New Cross) is already known to be extremely poor.		
Environment Agency	4	DM 05	We recommend the monitoring section of the new Local Plan could be updated to include annual updates on the total metres of rivers restored/improved, number of pollution incidents and m2 of urban greening e.g. areas of new/improved green spaces delivered such as parkland, riverside buffer zones and green roofs/walls. This will show how the positive new local plan policies on Green Infrastructure and climate change are delivering the policy objectives for environmental outcomes and urban greening, river restoration and adapting to climate change.	Noted.	Further monitors in the green infrastructure section added to monitoring framework, including on river corridor improvement.
Historic England	4	DM 05	Monitoring: It should be noted that the new London Plan	Noted. The London Plan	Further monitors included on heritage and historic environment.

			policy M1 (Monitoring) contains a new Key Performance Indicator relating to heritage. This is intended to monitor whether the applications that the GLA are consulted on have a beneficial, neutral or harmful impact on the historic environment – we would commend this approach to the Council in its monitoring framework.	monitors cover development activity in Lewisham in terms of referable applications. The Local Plan monitoring framework will be amended with additional monitors on heritage.	
London Wildlife Trust	4	DM 05	In Table 19.1 Monitoring framework, Green Infrastructure only has one measure, that of Open Space (LP18; No net loss of designated open space). We suggest another; no net loss in quantity of Sites of Importance for Nature Conservation.	Noted.	Further monitors in the green infrastructure section added to monitoring framework.
NHS (HUDU)	4	DM 05 Table 19.1	**DM5 Monitoring and Review** Table 19.1 which sets out Local Performance Indicators does not link the indicators to the vision and strategic objectives set out at the beginning of the Local Plan. Unfortunately, this makes it difficult to measure progress against the objectives.	Noted. The Local Plan monitoring framework has been reviewed and updated. Health is a cross-cutting issue so this topic area will	Further monitors added to monitoring framework, including monitors to measure improvement in addressing deprivation.

			There are no indicators relating to health and wellbeing. For Community Infrastructure the indicator is no net loss. (LP1 17) Given the scale of population growth set out in the local plan and that much of the existing community and social infrastructure is poor quality this indicator needs to measure the provision of new and fit for purpose community infrastructure, or new /improved infrastructure by area. For successful delivery of the local plan infrastructure needs to be provided when and where it is needed. We suggest local performance indicators for Strategic Objectives G, H and I <u>G Healthy and Safe Communities</u> 16. Measure (reduction) in health inequalities, particularly in geographic areas falling with the most deprived communities (IMD 2019). 17. % of the street network meeting the Healthy Street principles or scoring X	be addressed by the revisions.	

			18. No /% of developments which meet the policy requirement (35/50%) genuinely Affordable Housing within a tenure blind design. 19. Reduction in crime and fear of crime. <u>H Securing the Timely Delivery of Infrastructure</u> 20. % of the infrastructure set out in the IDP delivered alongside with housing development <u>I Ensuring High Quality Education, Health and Social Care</u> 22. Increase in residents accessing high quality education, health and social care facilities (baseline required to measure increase)		
The St John's Society	4	DM 05	There is a lack of measurable targets – how will Lewisham assess whether the Plan has been followed? Need 5 yearly targets and review.	Noted.	Noted. The Local Plan monitoring framework has been reviewed and updated with additional monitors.
The St John's Society	4	Enforcement	DELIVERY AND MONITORING The current planning enforcement needs to be stricter, tighter, and better funded. There needs to be	Planning enforcement is outside the scope of the Local Plan.	Local Plan amended with a point about the use of planning enforcement in the delivery section.

			much better enforcement with adequate resources and means to ensure much of the good work in the plan is realised. Without this deterrent, unplanned and even illegal development will continue.	However a point about the use of planning enforcement will be included in the delivery section.	
Blackheath Society no 2	5		**App 2 Glossary**: night-time economy (43 refs incl. re Blackheath) not defined here or in EC18. Appears to be 6pm-6am.6pm-12pm more appropriate for Blackheath which is not like Lewisham and Catford, which have more in common with central London. Design-led approach (54 refs) is not defined, although key to QD policies	Further details are set out in the London Plan. The council will use conditions to ensure operating hours are appropriate for the use and location.	No change.
Blackheath Society no 2	5		**Sch 1 Strategic and local views, vistas and landmarks** – few local views, none on/in/from Blackheath Village or Heath. Several needed, in all directions.	We are not considering more view within this version of the Local Plan	No change
Blackheath Society no 2	5		**Sch 5 Town centres** – Blackheath is a district centre per London Plan and draft Local Plan. What does this mean in practice? Benefits? Risks? Differentiation from others.	We are not considering more view within this version of the Local Plan	No change

Grove Park Neighbourhood Forum Ringway No 2	5		*Submitted The Ringway Gardens 268 Baring Road, Grove Park, London, SE12 0DS: Preliminary Ecological Appraisal*	Further work has been undertaken on this	The Urban National Park area has been upgraded to Metropolitan SINC
Telegraph Hill Society	5	Glossary	We refer to the following terms in the above paper which we believe require further consideration to avoid confusion: • Heritage Asset (paragraph 140) • Markets (paragraph 176) • Opportunity Area (to eliminate the discrepancy identified in paragraphs 34, 35 and 40)	Heritage assets and opportunity areas are defined in London Plan and national policy.	Local Plan amended with additional details on distinguishing markets for purpose of policy implementation, within the Markets policy.
Telegraph Hill Society	5	Glossary	There are also terms which are used within the Plan which are not defined in the glossary. In some instances they are terms that stem from government or GLA guidance and therefore definitions should be referred back to that, in others no definition is given and therefore the interpretation of those terms is left wholly open to doubt. Some terms which we believe should be considered for definition are: • design-led (see paragraph 42)	Many of the terms used are established by or set out the national planning policy framework, as well as the London Plan. These will need to be referred alongside the local plan. Some additional cross-referencing will	Local Plan glossary reviewed and updated.

			• garden (rather than “back garden” see the discussion in paragraphs 125 to 128 • good design • healthy streets (as in “Healthy Streets Approach” and “Healthy Streets principles”) • heritage environment (see paragraph 137) • home (family housing is defined, but “home” is not) • main town centre use • re-enforce and re-invent (as used in figure 3.2) • special characteristics (which we take to mean those characteristics which make an area distinctive and contribute to its specific character and which include but are not confined to those identified in the Characterisation Studies, Conservation Area Character Appraisals, area or site-specific SDGs and any Design Codes).	be added to the plan. The Local Plan also includes further definitions and details in the policy supporting text, and therefore are not repeated in the glossary.	
Blackheath Society	5	Schedule 1 QD 05	Few local views, none on/in/from Blackheath Village or Heath. Several needed, in all directions.	We are not considering more view within this version of the Local Plan	No change

Grove Park Neighbourhood Forum	5	Schedule 3	Schedule 3 – non designated heritage assets should include Buckthorne Cutting and the Hither Green / Grove Park Cutting from South Circular Grove Park Station in ASLC section.	Buckthorne Cutting is not designated as an ASLC	No change
HopCroft Neighbourhood Forum	5	Section 21 Part 2 Section 10	The green space appendix at the end of the document does not appear to show any intended protection enhancements despite the promises made, other than at Mountsfield Park. The Buckthorne Nature reserve that has been seeking protections for months/years is not even on the list.	Noted	This appendix has been updated to reflect those spaces designated through the additional Open Space and MOL reviews
HopCroft Neighbourhood Forum	5	Section 21	Schedule 3 – non designated heritage assets should include Buckthorne Cutting in ASLC section.	Buckthorne Cutting is not designated as an ASLC	No change

Lewisham Local Plan

Regulation 18 consultation statement

Appendix 2 – Regulation 18 Draft Local Plan Written Responses Split Landowners

September 2022

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Organisation (if relevant)	Part	Section, policy or paragraph	Comment	Council officer response	Action
L&Q Group	-	General	Moreover, at 865 pages, we consider the draft Local Plan is too long and could be shortened considerably. The Planning White Paper "Planning for the Future" (August 2020) directs that Local Plans should set clear rules rather than general policies for development, should be significantly shorter in length, and limited to no more than setting out site- or area-specific parameters and opportunities. In instances it is considered with appropriate checks in place via planning application requirements, could result in the removal of significant reduction in length of policies e.g. SD12 Ground Conditions; and number of design policies which are effectively repeats of the London Plan policies e.g. QC5 View Management and QD6 Optimising Site Capacity.	Noted. Policies have been included within the Local Plan where they provide useful local interpretation, to aid the implementation of the London Plan policies. It is acknowledged that there is some repetition of London Plan policies in parts of the plan however this is similar to approach taken by other London boroughs in their plans.	Local Plan reviewed and amended to reduce repetition and make more concise.
Artworks Creekside (Avison Young obo)	1	Vision and Strategic Objectives	*Relates to Part 3, LNA SA 16* Artworks Creekside support the Vision for Lewisham as set out in the draft Local Plan, that Deptford will emerge as a cultural hub and that the Council will supports local businesses, arts and cultural establishments, and where people thrive. The Strategic Objectives which accompany the Vision support the creation of inclusive, mixed and balanced neighbourhoods, making the best use of employment land to increase the number of jobs and provide suitable spaces for businesses, and making optimal use of land through the regeneration of Opportunity Areas.	Support noted.	No change.
Tribe Student Housing (Avison Young obo)	1	Vision and Strategic Objectives	*Relates to Part 3, LNA SA 06* **Local Plan: Main Issues and Preferred Approaches Document** The draft Local Plan sets out a shared vision for the future of the Borough through to 2040. The Plan identifies a number of strategic objectives for the borough over this timeframe, including meeting population growth and housing need, economic growth and job opportunities and creating healthy and safe communities. Our client supports the aspirations for the Local Plan.	Support noted.	No change.
Trundley's Road Ltd (Avison Young obo)	1	Vision and Strategic Objectives	*Relates to Part 3, LNA SA 06* **Local Plan: Main Issues and Preferred Approaches Document** The draft Local Plan sets out a shared vision for the future of the Borough through to 2040. The Plan identifies a number of strategic objectives for the borough over this timeframe, including meeting population growth and housing need, economic growth and job opportunities and creating healthy and safe communities. Our client supports the aspirations for the Local Plan.	Support noted.	No change.
Fifth State and (Avison Young obo)	1	Vision and Strategic	*Relates to Part 3, LNA SA 16* The Owners and Developer support the vision for Lewisham as set out in the draft Local Plan, in particular that Lewisham will continue to be a dynamic place	Support noted.	No change.

		Objectives	which supports local businesses, arts and cultural establishments, and where people thrive. The Strategic Objectives which accompany the Vision support the creation of inclusive, mixed and balanced neighbourhoods, making the best use of employment land to increase the number of jobs and provide suitable spaces for businesses, and making optimal use of land through the regeneration of Opportunity Areas.		
Freeths LLP (K/S Lewisham obo)	1	Vision	K/S supports as a matter of principle the strategic growth aims of the Local Plan, particularly as they relate to Lewisham Town Centre where the Site is located. As a committed investor and manager in the Town Centre, K/S welcomes the direction and vision identified in the Plan as it is essential that there is a clear and ambitious set of objectives for the Town Centre so it can continue to evolve and grow particularly against the challenging economic and social backdrop.	Support noted.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	1	Vision	**The Vision for Lewisham** **Is there anything you would like to see changed from the Vision for Lewisham?** The Council's website states that "The Local Plan presents a vision for how development should shape Lewisham over the next 20 years". We consider that "the Vision" (Page 48) as currently set out fails to do that, instead it makes generalised aspirations such as "We will give people the security and certainty they need so that everyone can live their best lives" and "A place that people want to visit and live in, and where they choose to stay and enjoy a good quality of life". The vision fails to articulate the proposed regeneration, growth and investment considered within Section 3 of the Local Plan; and therefore fails to reflect the "Good Growth Strategy". It fails to provide a direction of travel for the Plan period; and fails to demonstrate how the vision could be delivered through its planning policies. "The Vision" as worded could be describing any town in the UK. A vision needs to be clear, concise, aspirational but realistic. The Vision for Lewisham needs to reflect Lewisham's priorities, describe where and how change will happen and provide a clear sense of how the borough will look in 2040, while operating as a tool to measure the success of the Local Plan. As written, the Vision does not fulfil its requirements.	Noted. The Vision is an overarching, aspirational statement. Further details to help give effect to the Vision are included in the Strategic Objectives. Policy OL1 builds on this to provide details of the spatial strategy and delivery throughout the plan year period. It is noted that each character area in Part 3 includes a more detailed vision, as indicated in the representation, which links to the Borough vision.	No change.
GHL (Leegate) Limited (Frank Knight obo)	1	Strategic Objectives	*Relates to Part 3, LEA SA 03* **Part 1 - Strategic Objectives and the Spatial Strategy** The Council have identified that the overall strategic objective over the plan period to 2040 is to sustain and create inclusive neighbourhoods and communities that both reflect and reinforce the diversity and cultural heritage of Lewisham's people and places, by coordinating investment in such a way as to promote equality of opportunity for everyone to enjoy a good quality of life in Lewisham (Strategic Objective A.1). The Council will achieve this through providing housing tailored to the community with genuinely affordable homes (Strategic Objective B). The Council set out that the strategic objectives will be achieved by ensuring that the spatial strategy directly addresses the Local Plan objectives and provides a land use and planning framework to manage growth and guide investment over the next 20 years.	Noted.	No change.

GHL (Leegate) Limited (Frank Knight obo)	1	Strategic Objectives	The spatial strategy states that new investment will be directed to the borough's strategic areas for regeneration, and other local areas for regeneration, to help tackle deprivation and ensure equality of opportunity. Indeed, GHL supports the Council's vision and objectives for strategic regeneration. But, we note that proposed site allocations, such as Leegate Shopping Centre, should be regarded as a local area for regeneration such that they can perform a key role in meeting the Council's overarching vision for the regeneration of the borough, recognising how on-going regeneration of site allocations can act as a catalyst for the improvement of areas such as Lee Green. As such, we request that the **Council identifies site allocations as appropriate locations to direct regeneration**. This approach would align with National Planning Policy, which promotes the effective use of land, stipulating that strategic policies should *"make as much use as possible of previously-developed or brownfield land*" (Paragraph 117 of the NPPF). In this regard it is noted that, through the redevelopment of their land interest, GHL is well placed to assist in delivering the Council's strategic objectives and spatial strategy. Indeed, GHL's commitment to the regeneration of the Leegate Shopping Centre is demonstrated through on-going engagement with the LPA and other key stakeholders. Overall, GHL supports the Council's strategic objectives and spatial strategy for the regeneration of the borough and Lee Green District Centre, including the continued focus on making the best use of land and space, and prioritising the redevelopment of brownfield land for new housing, along with optimising the development of site allocations and other smaller sites across the Borough.	Noted. The spatial strategy sets out areas for regeneration consistent with the London Plan and based on local evidence. The Local Plan makes clear the opportunities for regeneration and revitalisation within Lee Green area and the shopping centre site.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	1	Strategic Objectives	**Strategic Objectives** **Do you have any comments on the strategic objectives?** The strategic objectives are clear and represent the key issues for the Council. The majority are locally distinctive. We note Strategic Objective H: "Securing the timely delivery infrastructure" and this includes the delivery of the Bakerloo Line Extension (BLE). The Charity commends the Council's positive approach to its delivery, and in parallel, we also welcome the Council's pragmatic approach to the BLE which is set out in the Spatial Strategy Options (please see below for further comments).	Support noted	No change.
Tetra Tech Planning (John Lyon's Charity obo)	1	Spatial Strategy Options	**Do you have any comments on the spatial (growth) strategy scenarios and associated options?** Scenario 1, which depicts no BLE, is the "baseline scenario". This scenario brings forward areas which are a "focus for growth" and a "focus for regeneration" across the Borough, which is fully supported by the Charity. Notwithstanding the absence of the BLE, we note that the Bell Green/Lower Sydenham area is "a focus for regeneration" and the "Site Allocations" outlined within Section 3 of the Regulation 18 Local Plan are taken forward, which is also welcomed and supported by the Charity. Scenario 2, which depicts BLE Phase 1 only, again brings forward those areas which are a "focus for growth" and a "focus for regeneration" which again is fully supported by the Charity.	Support for the differing scenarios and a higher growth strategy should BLE Phase 2 come forward is noted. Agree with the need to ensure consistency between residential units between the Local Plan and the IIA.	Local Plan and IIA have been amended to ensure consistency in residential units. AECOM

			Scenario 3, which depicts both BLE Phases 1 and 2, maintains the approach taken in Scenarios 1 and 2 and also brings forward “intensification in Bell Green”, and “additional intensification in Bell Green”. Frustratingly, there is no further detail provided on the three scenarios within this section of the Local Plan, with paragraph 3.18 stating that “The IIA should be referred for further details on the options as well as assessments of their likely social, environmental and economic impacts”. A review of the Integrated Impact Assessment (IIA) provides clarification on the further details of the scenarios. We note that the Council has undertaken initial work to understand the potential to achieve higher densities at the six Bell Green/Lower Sydenham sites under a scenario with BLE Phase 2; and this could provide as much as 200% uplift in development densities (we understand this to be the “additional intensification”), with 100% also considered appropriate (we understand this to be “intensification”). Table 5.7 within the IIA presents the reasonable growth scenarios in terms of housing numbers for each scenario. The baseline position (Scenario 1) provides for 1,540 units for the six sites and this remains unchanged under Scenario 2 (this figure is in line with the (minimum) “1,543 units” calculated for those six sites in the Site Allocations section of the Local Plan). However, Table 5.7 presents 3,090 units for the 100% uplift scenario and 4,630 units for the 200% uplift under Scenario 3. When adding the maximum indicative housing numbers from the six allocations, there is a total of 3,778 units, which is 851 units less than the 200% uplift number in the IIP. Further clarification is required on the change in unit numbers. The focus for growth and regeneration regardless of BLE is wholly supported and the ambition of the higher growth strategy should the BLE Phase 2 come forward, specifically the higher densities in Bell Green/Lower Sydenham is commended.		
Tetra Tech Planning (John Lyon’s Charity obo)	1	Figure 3.8	The Proposed Growth Strategy (Figure 3.8) now presents “Growth Nodes” and “Regeneration Nodes” as opposed to “Focus for Regeneration” and “Focus for Growth” and the nodes represent wider areas. This Preferred Option presents both Phases 1 and 2 of the BLE.	Comments noted.	Section revised to provide clarity
Tetra Tech Planning (John Lyon’s Charity obo)	1	OL 01	The Preferred Option, Policy OL1 (d) directs new investment to the Borough’s Strategic Area for Regeneration, and other local areas for regeneration, and the Charity supports this designation and the Regeneration Node assigned to Bell Green/Lower Sydenham. Policy OL1 (e) sets out that new and improved community and strategic transport infrastructure including the BLE, will be a catalyst for investment and will unlock the development potential of the Borough. The Charity fully agrees with this view but the absence of BLE Phase 2 should not preclude development or the potential for transformational change to the south of the Borough.	Noted.	Local Plan amended to reflect that growth and development in the south of the borough is not contingent on the BLE but the BLE will help to improve accessibility and optimal use of land.
Transport for London Commercial Development	1	OL 01	**OL1 Delivering an Open Lewisham** TfL CD supports Policy OL1 criterion Ad which directs new development to principal transport routes, nodes and interchanges. However, TfL CD consider that Policy OL1 should promote development in areas which are well-connected more generally and not just at ‘principal’ locations.	Support noted.	Local Plan spatial strategy amended to promote development in areas which are well-connected.
Fifth State and (Avison Young obo)	1	OL 01	*Relates to Part 3, LNA SA 16* ***Draft Policy OL1 - Delivering an Open Lewisham (spatial strategy)*** The Owners and Developer of 5-9 Creekside strongly support the strategy to deliver an Open Lewisham as set out in draft Policy OL1. Ensuring that the growth and regeneration potential of Lewisham’s Opportunity Areas, including Deptford	Support noted.	No change.

			Creek / Greenwich Riverside, are fully realised (part a), and promoting the optimisation and intensification of Strategic Sites (Part F) will ensure that development potential is able to be maximised and will encourage the most efficient use of land, in line with paragraph 122 of the NPPF. Fifth State also support Part G of the draft policy which requires development to be delivered through a design-led approach which is informed by an understanding of the local area character in order to secure liveable communities that are inclusive to all.		
L&Q Group	1 1	OL 01 Para 3.40	*Relates to Call for site* **3. Overview of Representations** L&Q is supportive of the overall vision of London Borough Lewisham ("LBL") and your aim to plan positively to meet identified development needs through the draft Local Plan. This includes supporting well integrated, higher density and mixed-use developments (para 3.40). However, there are some areas in the draft Local Plan where L&Q consider amendments and / or more detail is required to make the policies more usable and effective.	Support noted.	No change.
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	1	OL 01	*Relates to Call for site* **Policy OL1 Delivering an Open Lewisham (spatial strategy)** Draft Policy OL1 sets out the Council's strategic policy on delivering its core objectives for meeting development needs, which focuses on ensuring the growth and regeneration of Opportunity Areas are realised, as well as directing investment to Areas of Regeneration. Draft Policy OL1 goes on to note the Council will proactively seek to make the best use of land by prioritising the redevelopment of brownfield land for housing and workspace, including through intensification. We consider this approach to be logical and compliant with national policy, which requires optimisation of previously developed land for development, and patterns of growth to be focused on locations which are sustainable, thus reducing the need to travel and offering a choice of transport modes. Through application of these criteria, the Council identifies Deptford Creek / Greenwich Riverside Opportunity Area as a location that will accommodate a significant proportion of the Council's growth, which is to be focused on site allocations in the emerging Plan. We support the general acknowledgement from the Council that high density, strategic scale development will be encouraged in such locations, which is consistent with the London Plan, but recommend that Policy OL1 explicitly supports opportunities to intensify and make more efficient use of designated employment land as this is fundamental to the deliverability of the emerging Plan. As a result it should be fed into the Plan's overarching policy which then cascades through its employment policies where a number of designated employment sites are recommended for allocation.	Noted. The spatial strategy sets out principles for locations to direct growth and development, whilst making the optimal use of land. It is does not necessarily distinguish between different types of uses. Making the optimal use of employment land is clearly set out in the Part 2 policies on Economy and Culture, which builds on the spatial strategy.	No change.
Albacore Meeting Room Trust (Lichfields obo)	1	OL 01	*Relates to Call for site* **(b) Spatial Strategy Options: (OL1) Delivering an Open Lewisham (Spatial Strategy)** Following from this, the Trust supports LBL's intention to direct new investment to the strategic area for regeneration, which includes Beckenham Hill road ('part b'). The Trust particularly supports part 'f' of OL1 which states the Borough's intention, in line with National and London Plan Policy, to proactively seek to	Support noted. Optimising the use of brownfield sites is reflected in the spatial strategy and elsewhere in the plan.	No change.

			make the best use of land and space and prioritise the redevelopment of brownfield land to meet local needs. Part 'g', which requires all new development to be delivered through the 'design-led approach', is also supported. It will be important to ensure that LBL optimises use of its brownfield land to assist with meeting development needs, including for community uses. This approach is supported by the NPPF (paras 117 and 118c).		
GHL (Leegate) Limited (Frank Knight obo)	1	OL 01	Policy OL1 (Delivering an Open Lewisham – Spatial Strategy) explains that the Council will promote a vibrant and diverse multi-centred borough by directing new residential, commercial, community, leisure and cultural development to Lewisham's town, district and local centres, in order to support their vitality and long-term resilience. LBL will ensure that district centres, such as Lee Green, retain their distinctive features, whilst evolving in their function as key hubs of community, cultural and commercial activity. GHL broadly supports the proposed strategic priorities and spatial strategy in the Lewisham Local Plan Review, and it is welcomed that the Council acknowledges, and intends to respond to, the need for flexibility of land uses within Lewisham's town, district and local centres.	Support noted.	No change.
LaSalle Investment Management (Savills obo)	1	OL 01	*Relates to Part 3, LSA SA 10* **Part One: Vision, Strategic Objectives, and the Spatial Strategy** ***OL1 Delivering an Open Lewisham*** LSIM support the Vision, Strategic Objectives and Spatial Strategy for the Borough. This specifically includes the intention to facilitate new development along the north-south A21 corridor (Lewisham High Street, Rushey Green and Bromley Road). To help realise these aspirations, LSIM would strongly advocate that the Council captures greater potential for the redevelopment and / or intensification of existing commercial 'brownfield sites' within the spatial strategy. Such sites provide an opportunity for intensification of quantum and diversification of uses, including residential, which may support the existing commercial operations that exist. The aspiration to evolve from single use areas to mixed use neighbourhoods, including the provision of higher densities, is essential in order to deliver the wider objectives relating to growth. Critical to the success of the transformation will be the integration of old and new and the Plan needs to establish some clear objectives to ensure that goal is achieved.	Support noted. Support is noted. The Local Plan already identifies a range of brownfield sites for redevelopment, mixed uses, intensification, diversification within town centres and co-location on selected suitable sites whilst protecting SIL, LSIS and non-designated employment areas. Strategic objectives in the Local Plan include positively managing the delivery of new homes across the Borough and making the best use of employment land. The policy also seeks to make the best use of land and space by prioritising the redevelopment of brownfield land and enabling the sensitive intensification of established residential neighbourhoods and commercial areas. Optimal	No change.

				capacities for sites will be established at planning application stage through a design led approach.	
Artworks Creekside (Avison Young obo)	1	OL 01	*Relates to Part 3, LNA SA 16* **Comments on Local Plan Main Issues and Preferred Approaches Document** A series of comments are provided below in respect of various sections of the Local Plan Main Issues and Preferred Approaches Document which are of relevance to the proposed redevelopment of 2 Creekside and 3 Creekside. ***Draft Policy OL1 - Delivering an Open Lewisham (spatial strategy)*** Artworks Creekside strongly support the strategy to deliver an Open Lewisham as set out in draft Policy OL1, in particular the strategic objective of ensuring that the growth and regeneration potential of Lewisham's Opportunity Areas, including Deptford Creek / Greenwich Riverside, are fully realised (part a), and promoting the optimisation and intensification of Strategic Sites and brownfield land for new housing and workspace (Part f) will ensure that development potential is able to be maximised and will encourage the most efficient use of land. Artworks Creekside also support Part g of the draft policy which requires development to be delivered through a design-led approach which is informed by an understanding of the local area character in order to secure liveable communities that are inclusive to all.	Support noted.	No change.
L&Q Group	2	Section 5	*Relates to Call for site* **4. Detailed Comments** The following summarises L&Q's comments on relevant policies of the Local Plan in turn. 4.1 High quality design L&Q supports the Council's ambition for new developments to be design led to deliver high-quality inclusive developments, which responds to the local context alongside considering the most optimal use for the land, to support the delivery of LBL spatial strategy.	Support noted. Comments to additional representations set out elsewhere in the Consultation Statement.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	2	Chapter 05	**High Quality Design** **Do you agree that the Local Plan has identified all of the issues around design quality?** Yes, the design chapter is very detailed, covers all expected areas and broadly accords with policies within the new London Plan (2021). The Charity supports a design-led approach to all development proposals.	Support noted.	No change.
L&Q Group	2 2 2 2	QD 01 QD 04 Para 5.31 Figure 5.1	*Relates to Call for site* *Tall buildings* This includes optimising the use of land through comprehensive redevelopment of strategic sites (i.e. site allocations) and recognising it may be necessary to build higher in some places, including tall buildings, so they can support the strategic objectives of the borough, and deliver wider public benefits such as genuinely affordable housing (para 5.31). The Lewisham Characterisation Study (2019) provides an analysis of the character of various areas within the borough. L&Q supports LBL's recognition in Policy QD1 (Delivering high quality design in Lewisham) that proposals should	Noted. Noted. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022).	Policy QD4 amended throughout to ensure conformity with the London Plan, with revisions also informed by the Tall Buildings Study Addendum (2022). Policy QD4 amended to include reference to DM4 (Masterplans and

			take account of the "prevailing and emerging form of development". Taking that into account, L&Q agree it is appropriate that all of Deptford is considered suitable for tall buildings, as shown in Figure 5.1. Policy QD1 C) indicates that proposals for taller buildings will be considered having regard to the emerging context and criteria QD4.B(e)- QD4.B(f) above. However, item QD4.B(f) is missing from the text so we do not know what the final criteria is in this assessment. Policy QD1 G) states that tall buildings are to be delivered through masterplan process. More detail is required on what this entails and how it is capture in the planning application process. We note in the recent Secretary of State (SoS) direction on the London Plan, changes have been made in relation to higher density buildings (Policy D3). Notably, SoS states that design of development must optimise capacity and where there are existing clusters of high-density buildings, expansion of the clusters should be positively considered by Boroughs. This should be incorporated into the policy text.		comprehensive development), which provides further details to support policy implementation.
GHL (Leegate) Limited (Frank Knight obo)	2	QD 01	*Relates to Part 3, LEA SA 03* **Part 2 – Development Management Policies** 1. High Quality Design The Council continues to promote the delivery of high-quality design in Lewisham through a design-led approach (Policy QD1, Delivering high quality design in Lewisham), stating that buildings and spaces must be welcoming, inclusive, safe and accessible to all, and that proposals should facilitate good physical and mental health. GHL supports the premise of Policy QD1 which reflects the Mayor's vision for '*Good Growth*' set out in the London Plan 2021.	Support noted.	No change.
Artworks Creekside (Avison Young obo)	2	QD 01	*Relates to Part 3, LNA SA 16* ***Draft Policy QD1 – Delivering high quality design in Lewisham*** The draft policy advocates a design-led approach to development which ensures that the review of design options at an early stage of the development process are informed by an understanding of the local context. Our pre-application discussions with Council Officers to date have been undertaken on an iterative process and which has sought to understand the local context first, before then building a re-development strategy that responds to the specific characteristics found within Creekside.	Noted.	Local Plan amended to emphasise local distinctiveness and site context within the design-led approach.
Fifth State and (Avison Young obo)	2	QD 01	*Relates to Part 3, LNA SA 16* ***Draft Policy QD1 – Delivering high quality design in Lewisham*** Whilst the Owners and Developer of 5-9 Creekside support, in principle, the draft policy which advocates a design-led approach to development, it is considered that in order to reflect London Plan Policy D3 (optimising site capacity through the design-led approach), <u>further text should be added which positively promotes optimising the capacity of sites, including site allocations, providing policy support for higher density developments in well connected locations</u>. In our view, the proposed amends would ensure the policy is consistent with national and strategic policy and would subsequently enable the delivery of sustainable development in accordance with the NPPF and London Plan.	Noted. The draft Local Plan already includes policies which seek to make the best use of land and optimise the capacity of sites. However, it is acknowledged this could be included in the Policy OL1 to set a clear direction linked to the spatial strategy.	Policy OL1 amended to make a specific reference to making the optimal use of land.
Transport for London	2	QD 01	**QD1 Delivering High Quality Design in Lewisham** TfL CD appreciate that local character is an important consideration in the design of new development schemes. However, it is considered that as currently written	Noted. Policies have been included within the Local Plan where they provide	Local Plan reviewed and amended to reduce repetition and make

Commercial Development			the policy could discourage innovation or change, which is not in line with paragraph 127 of the National Planning Policy Framework 2019 (NPPF) which states that: *"planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)"* It is recommended that this policy is amended to reflect the sentiment of the above NPPF paragraph. It is also considered that criterion B and C are repetitive, and that B, C and D could be joined to make the policy more succinct.	useful local interpretation, to aid the implementation of the London Plan policies. It is acknowledged that there is some repetition of London Plan policies in parts of the plan however this is similar to approach taken by other London boroughs in their plans.	more concise, thereby shortening the length of the Local Plan.
SGN (Quod obo)	2	QD 01	*Relates to Part 3, LSA SA 01* **Chapter 5 - High Quality Design** 5.4 SGN support the overarching design objective of ensuring that all new developments must follow a design-led approach in delivering high quality buildings in Lewisham. This is consistent with London Plan Policy D3. SGN recognise and support Lewisham's aspirations at draft Policy QD1 'Delivery high quality design in Lewisham' in ensuring that all new developments should respond positively to local distinctiveness; should put people at the centre of the design-led approach; should secure a coherent and well-function relationship with all land uses and spaces within the site and its surroundings and deliver high quality developments.	Support noted.	No change.
Phoenix Community Housing (BPTW obo)	2	QD 01	**High Quality Design** We support the shift to using a design-led approach to determining the most appropriate form of development and site capacity, set out in policies QD1 and QD6, and we will be commenting separately on the Small Sites Design Guide SPD which will be useful guidance filling the void left by the rescinding of the London Plan density matrix. It is agreed that the capacity of infrastructure should be an influencing factor on site capacity, with regard to individual and cumulative impacts of development. However, it should be noted that incremental development has a vital role to play in supporting the vitality of existing and viability of additional public and active transport infrastructure in more peripheral areas. This should be a positive factor on site capacity subject to appropriate measures being incorporated to maximise their uptake – for instance restricted vehicular parking and high quality, accessible and inclusive cycle parking.	Noted. The Local Plan broadly seeks to support the sensitive intensification of established residential and commercial areas. This is set out in Policy OL1 as part of the spatial strategy. Furthermore, draft Local Plan Policy housing policies give effect to this approach, for example, through promotion of small housing sites. The draft policies provide that new development should enable and encourage movement by walking, cycling and the use of public transport, and that new development must be appropriately supported by infrastructure. The preparation of the Small Sites SPD is outside the scope of the Local Plan.	No change.
QUOD (Landsec obo - Lewisham	2 2	QD 01 QD 02	**9 Chapter 5 High Quality Design**	Support is noted.	No change.

Shopping Centre)	2	QD 03	9.1 Chapter 5 contains key policies on high quality design aiming to ensure that growth is character-led; promoting inclusive and liveable neighbourhoods; and making best use of land. **Design Principles** 9.2 Landsec support the overarching design objective of ensuring that all new developments must follow a design-led approach in delivering high quality buildings in Lewisham. Landsec recognise and support Lewisham's aspirations at draft Policy QD1 'Delivery high quality design in Lewisham' in ensuring that all new developments should respond positively to local distinctiveness; should put people at the centre of the design-led approach; should secure a coherent and well-function relationship with all land uses and spaces within the site and its surroundings and deliver high quality developments. 9.3 The design principles relating to inclusive and safe design (draft Policy QD2) and public realm and connecting places (draft Policy QD3) are also welcomed.		
Lendlease (Lichfields obo)	2	QD 02	*Relates to Part 3, LNA SA 02* **High Quality Design** Lendlease is supportive of Lewisham's ambitions to ensure new development follows a design-led approach, and that both design and the public realm are accessible, inclusive and high-quality. *Policy QD2 – Inclusive and Safe Design* As noted above, much of this policy unnecessarily replicates existing 2021 London Plan policy and should be made more concise. Part E refers to the provision of communal private amenity space and facilities, noting that '*this should be made available for access by all residents occupying the development, regardless of tenure.'* Lendlease note that in large developments management issues can often make this policy unfeasible, for example where rooftop space is provided as communal space. Although some communal spaces, such as play space, should be accessible to all, this policy would be better worded along the lines of 'all residents should have access to the same quality and standard of communal space across a development, regardless of tenure.	Noted. Disagree with suggested policy wording as this is considered contrary to London Plan and the Government's National Design Guide on tenure neutral housing. However it is acknowledged that the policy could be amended to provide more clarification around the need for appropriate management of any such private communal amenity space.	Local Plan Policy QD2 amended to include criterion on appropriate management of private and communal amenity space, along with a reference to Government's National Design Guide and tenure neutral housing.
Barratt London and the Church Commissioners (Avison Young obo)	2	QD 02	*Relates to Part 3, LCA SA 20* **Chapter 5 High Quality Design** **Draft Policy QD2 Inclusive and safe design** Barratt London and the Church Commissioners support the principles of this Draft Policy to contribute to delivering inclusive, accessible, safe and secure environments in Lewisham. Part B(b) and Part E refer to access to all buildings and spaces being made available to all residents occupying the development, with Part B(b) requiring buildings and spaces to be designed to be inclusive to all and 'not unnecessarily restrict or prevent access and use, including by occupants of different tenure types' (our underlining). The current wording of these parts of the Draft Policy could give rise to significant security and management issues at the occupation stage. Part B(e) is clear that development proposals must have regard to 'Secured by Design' principles and supporting para 5.14 states proposals will be expected	Noted.	Local Plan Policy QD2 amended to include criterion on appropriate management of private and communal amenity space, along with a reference to Government's National Design Guide and tenure neutral housing.

			to demonstrate that they have engaged with the latest standing guidance on 'Secure by Design', and we highlight that Part B(b) and Part E in their current form conflict with this. In particular, the Secured by Design Homes Guide (2019) which sets out the current standards is clear at Para 27.29 that 'developments of over 25 flats, apartments, bedsits or bedrooms can suffer adversely from anti-social behaviour due to unrestricted access to all areas and floors of the building. SBD therefore seeks to prevent unlawful free movement throughout the building through the use of an access control system'. The Guide sets out that an acceptable approach is that each resident be assigned access to their floor only from lift/stairwells via an encrypted electronic key/fob, and access to stairwells from communal lobbies be restricted to residents only to reduce the risk of anti-social behaviour or criminal activities. The current wording of Part B(b) and Part E clearly conflicts with the Secured by Design Homes Guide (2019), and therefore also conflicts Part B(e) and supporting para 5.14 of Draft Policy QD2. In addition, large developments which contain many blocks or uses are often owned and/or managed by different parties who may have individual security and management requirements. Of note, affordable housing provision is most often managed separately to the wider housing offer by a Registered Provider (RP), and RPs will likely wish to ensure their residents are not subject to service charges of areas which they rarely use. We, therefore, request the Draft Policy is amended to be clear that 'appropriate restriction of access for management and/or security reasons would be acceptable' within new development schemes.		
SGN (Quod obo)	2 3	QD 02	*Relates to Part 3, LSA SA 01* 5.5 The design principles relating to inclusive and safe design (draft Policy QD2) are also welcomed.	Support noted.	No change.
Phoenix Community Housing (BPTW obo)	2	QD 02	Accessible and inclusive housing is a cornerstone of PCH's operations, and accordingly the requirement for 10% M4(3) and remainder M4(2) provision in line with the London Plan is wholly supported. However we welcome the flexibility on this built into the supporting text, for instance discretionary lift provision on constrained infill sites. We would suggest the inclusion of further flexibility, for example for schemes that overprovide on affordable housing, or that enables Housing Associations to meet the accessibility requirements across a wider portfolio, given that some sites more easily lend themselves to wheelchair housing.	Noted. Draft Local Plan Policy QD2 Paragraph 5.16 already provides flexibility and that individual site circumstances will be taken into account.	No change.
Lendlease (Lichfields obo)	2	QD 03	*Relates to Part 3, LNA SA 02* *Policy QD3 Public realm and connecting places* Lendlease is supportive of Lewisham's ambitions for high-quality, design-led public realm. However, much of this policy replicates existing policies, such as London Plan 2021 Policy D8 (Public Realm). This policy should avoid unnecessary repetition and be made more concise. Part G of this policy sets out a number of specific requirements that provision should be made for in the public realm. It is unclear how these will be applied to individual schemes, as many of these requirements seem feasible only for a larger-scale public realm provision. More clarity on how this policy will be applied to individual schemes would be welcomed.	Noted. Part G includes a list of indicative measures that could be incorporated into the public realm. The policy will be amended to reflect that measures should be considered on a case-by-case basis.	Local Plan policy QD3 Part G amended to provide clarity for implementation, making clear that the public realm measures should respond to the uses involved along with the location, nature and scale of development.
Cockpit Arts (The Planning Lab obo)	2	QD 03	*Relates to Part 3, LNA SA 14* • Cockpit Arts (CA) is an international leader in craft and design. We are particularly supportive of specific policy that promotes high standards for	Support noted.	No change.

			new/enhancement of existing public realm, which emphasises inclusivity, safe streets, connectivity, legibility, and permeability. • We are also supportive of the drive to promote sustainability in design and construction of public realm.		
SGN (Quod obo)	2	QD 03	*Relates to Part 3, LSA SA 01* 5.5 The design principles relating public realm and connecting places (draft Policy QD3) are also welcomed.	Support noted.	No change.
Fifth State and (Avison Young obo)	2	QD 04	*Relates to Part 3, LNA SA 16* ***Draft Policy QD4 – Building heights*** Figure 5.1 identifies locations which are suitable for tall buildings. The Owners and Developer of 5-9 Creekside welcome and support the identification of Creekside as a location which is suitable for the development of tall buildings. This reflects its position within the Deptford Creek / Greenwich Riverside Opportunity Area. Part C of the draft policy refers to criteria QD4.B(e) – QD4.B(f) however there is no criterion B(f) and so further clarification is required to ensure Part C aligns with the relevant sections of Part B. We consider that Part D of the policy which defines what a tall building is in specific localities aligns with London Plan Policy D9 Part A and is supported.	Noted. In response to public consultation feedback on the Regulation 18 plan, it is necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022).	Policy QD4 amended throughout to ensure conformity with the London Plan, with revisions also informed by the Tall Buildings Study Addendum (2022).
Fifth State and (Avison Young obo)	2	QD 04	*Relates to Part 3, LNA SA 16* Part F of the draft policy lists assessment criteria for tall buildings, with F(c) referring to heights being sensitive to the site's immediate and wider context. We consider that this criterion should also refer to the emerging immediate and wider context, given that most areas identified for tall buildings are also subject to emerging site allocations for development and therefore the context will change as these allocations are realised. This will ensure the most efficient use of land in these locations, such as Deptford Creekside.	Noted. Agreed that the emerging local context should also be taken into account.	Draft Local Plan QD1 amended to provide clarification that development proposals should have regard to existing and emerging context, recognising that the character of sites and areas may evolve over time in accordance with the spatial strategy. Policy QD4 includes a cross-reference to QD1, which ensures this will be a consideration determining appropriate building heights.
Lendlease (Lichfields obo)	2	QD 04	*Relates to Part 3, LNA SA 02* *Policy QD4 Building heights* Figures 5.1 and 5.2 show the suitability and sensitivity of sites in Lewisham for tall building development. We consider the shading and legend for these plans to be unclear, which makes the policy difficult to interpret. It would be simpler and more accessible to designate areas where tall buildings are appropriate, and clearly display these on a plan.	Noted.	Local Plan amended to make clear the locations that are suitable for tall buildings, with clear boundaries. This will be reflected in Map 5.1 and set out in the associated Policies Map.
Barratt London and the Church Commissioners	2 2	QD 04 Figure 5.1	*Relates to Part 3, LCA SA 20* **Draft Policy QD4 Building heights** Barratt London and the Church Commissioners are strongly supportive of the Plassy Island site, and the wider Catford Town Centre, being identified within Figure 5.1 as a location considered acceptable for tall buildings.	Support noted. Agree that the emerging local context should also be taken into account.	Draft Local Plan QD1 amended to provide clarification that development proposals should have regard to

(Avison Young obo)			Part F of Draft Policy QD4 lists assessment criteria for tall building proposals, with F(c) referring to heights being sensitive to the site's immediate and wider context. We consider this criterion should also refer to the 'emerging immediate and wider context' given that most areas identified for tall buildings are also subject to emerging allocations for development and therefore the context will change as these allocations are realised. This will ensure that the best and most efficient use of land is secured in these locations, including within Catford Town Centre and on the Plassy Island site. This will also ensure Draft Policy QD4 aligns with Draft Policy LCA3 Part D which states 'development proposals should respond positively to the evolving urban scale and character of the town centre and its immediate surrounds'.		existing and emerging context, recognising that the character of sites and areas may evolve over time in accordance with the spatial strategy. Policy QD4 includes a cross-reference to QD1, which ensures this will be a consideration determining appropriate building heights.
Tetra Tech Planning (John Lyon's Charity obo)	2 2 2	QD 04 Figure 5.1 Figure 5.2	The Charity considers that Part D(b) (Tall Buildings) of Policy QD4 Building Heights requires greater clarity within the policy in defining "significantly taller" buildings, noting the definition within London Plan Policy D9 Tall buildings (Part A), which states that they "should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey". Figure 5.1 presents a "suitability plan" for tall buildings. The use of the coloured fading on the key is very difficult to read, however it appears that most areas within the South Strategic Regeneration Area are considered to be "less suitable" for tall buildings including those six site allocations within Bell Green/Lower Sydenham where there is the potential for a higher growth strategy (and potential 'Opportunity Area' designation). In addition, on review of the Draft Tall Buildings Study (2021) we note that the Bell Green/Lower Sydenham area is generally categorised as "less sensitive", which is confirmed in Figure 5.2 (Tall Buildings sensitivity plan), therefore we would question the "less suitable" designation of the area.	Noted. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022).	Policy QD4 amended throughout to ensure conformity with the London Plan, with revisions also informed by the Tall Buildings Study Addendum (2022).
GHL (Leegate) Limited (Frank Knight obo)	2 2	QD 04 Figure 5.1	*Relates to Part 3, LEA SA 03* Policy QD4 (Building heights) and Figure 5.1 (Tall buildings suitability plan) sets out areas where tall buildings are considered acceptable in-principle, in accordance with London Plan Policy D9 (Tall buildings). Policy QD4 notes that tall buildings must be delivered through a masterplan process in order to ensure that they are appropriately located both within a site and wider locality, designed to a high standard and effectively managed. GHL broadly supports Policy QD4 and Figure 5.1, which identifies Leegate Shopping Centre as an area that is suitable for tall buildings. This is also supported within the Draft Tall Building's Survey (March 2021), an evidence document, where the site is identified as accommodating building heights of up to 16 storeys. Notwithstanding this, GHL is keen to understand how the application of this policy will determine appropriate building heights. It is recognised that tall buildings should be delivered to a high-quality design, but it is not a reasonable requirement that all tall building proposals need to undergo an extensive masterplan process exercise. Whist GHL agrees that tall buildings require detailed design scrutiny, as set by the London Plan policy requirements (London Plan Supporting Paragraph 3.9.4), the requirement for a masterplan process is onerous and not fully justified or effective.	Noted. The draft Local Plan policy makes a distinction between masterplans required by the local authority and other requirements for proposals that hit the threshold to be referred to the Mayor of London. Given their scale and impact, it is considered appropriate to require tall buildings to be informed and delivered through the masterplan process.	Policy QD4 amended to provide further clarification around requirements for masterplan, with cross-reference to Policy DM4 (Comprehensive development and master planning). Tall building policy has been amended.
LaSalle Investment	2 2	QD 04	*Relates to Part 3, LSA SA 10* **Part Two: Managing Development** ***QD4 Building Heights***	Following the Regulation 18 consultation, the site	No change.

Management (Savills obo)		Figure 5.1	Policy QD4 states that 'tall buildings' will only be considered acceptable in-principle in the locations identified at Figure 5.1 as being appropriate for tall buildings. Whilst LSIM acknowledge the requirement to adopt a strategy for the delivery of tall buildings within the Borough the policy as currently drafted is considered to be overly restrictive and greater flexibility should be introduced to ensure the delivery of residential units can be optimised. This is particularly relevant for sites which are proposed to be allocated for residential-led mixed use development so as not to stifle innovative design. The appropriateness of the final level of density can only be judged on a site by site basis. This will need to take into consideration a range of matters linked to accessibility, quality of accommodation and place, amenity and social infrastructure. The strategic designation for the Homebase site on Bromley Road is for growth and intensification. In order to increase the development capacity on brownfield land and to ensure development viability at strategic sites, the policy should not look to unduly restrict building heights. The restriction on tall buildings without a proper consideration of design and assessment key views within the growth and intensification areas would undermine the opportunity to increase development capacity, which in turn affects the regeneration opportunity. LSIM request that Policy QD4 is revised to take account of those sites outside of the locations identified at Figure 5.1 and confirm support for redevelopment of these for higher densities where the criteria outlined at part F of the policy are demonstrated. This will ensure that the policy is sufficiently flexible to ensure that the strategic objectives and allocations to secure the Council's development needs are deliverable.	capacities and mix of uses have been re-visited. This has taken into account the complexities of the Homebase/Argos, Bromley Road site – including that it is an out-of-centre retail site, the reduced demand for retail post-Covid, the need to protect the setting of the pond and to respond to the surrounding character and heritage assets. Based on these considerations, the land use mix and residential units have remained the same. However, agree that the appropriateness of the final level of density can only be judged on a site by site basis. Optimal capacities for sites will be established at planning application stage through a design led approach. Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Part 2 Policy QD4 Building Heights and the suitability for tall buildings at the Homebase site.	
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	2	QD 04	*Relates to Part 3, LNA SA 14* **Tall Buildings** With regard to tall buildings in the Borough, our Client considers that greater flexibility should be afforded to the location of tall buildings, specifically within site allocations. While our Client is supportive of the Policy QD4 (Buildings heights) in that tall buildings should respond positively to the distinctive character of Lewisham's neighbourhoods, London Plan Policy D9 (Tall buildings) states that tall buildings have a key role in facilitating regeneration opportunities and future growth.	Noted. Not all of the Local Plan site allocations will be suitable for tall buildings and therefore the proposed words could be misleading. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to	No change.

			Therefore, it is considered that in order to **effectively** deliver regeneration through provision of new homes and employment/commercial floorspace within site allocations and be **consistent** within the regeneration objectives of tall buildings within the London Plan and particularly brownfield sites such as Sun Wharf, Policy QD4 should afford greater flexibility to tall buildings within site allocations. As such, we request the following text be added to Policy QD4 (the additions are shown underlined): *Proposals for new tall buildings within site allocations should be supported, provided that they meet the criteria of part B of this policy.* Making these changes would ensure that the draft Local Plan **is consistent** with national policy and **effective** in its delivery.	update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022). This will make clear areas that are considered suitable for tall buildings.	
Cockpit Arts (The Planning Lab obo)	2	QD 04	*Relates to Part 3, LNA SA 14* • CA is in agreement with the areas identified as suitable for tall buildings in the Tall Buildings Suitability Plan. • We endorse the stipulation for a masterplan process requirement for new tall buildings. • See also our response to Site Allocation 14 (Sun Wharf), below.	Support noted. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022). This will make clear areas that are considered suitable for tall buildings.	Policy QD4 amended throughout to ensure conformity with the London Plan, with revisions also informed by the Tall Buildings Study Addendum (2022).
Artworks Creekside (Avison Young obo)	2	QD 04	*Relates to Part 3, LNA SA 16* ***Draft Policy QD4 – Building heights*** We note that the sites fall within locations which are suitable for tall buildings which is supported by Artworks Creekside. Given the changing context of Creekside, it is imperative that any reference to the "site's context" within the Policy includes site allocations, locations of change and extant permissions within the vicinity of the site – as noted in para. 5.35 of the post-amble. We note that there is an inconsistency in the drafting in Part C of the Policy.	Noted. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022).	Draft Local Plan QD1 amended to provide clarification that development proposals should have regard to existing and emerging context, recognising that the character of sites and areas may evolve over time in accordance with the spatial strategy. Policy QD4 includes a cross-reference to QD1, which ensures this will be a consideration determining appropriate building heights.
Selkent Holdings (Daniel Watney LLP)	2	QD 04	*Relates to Part 3, LWA SA 09* **Draft Policy QD4 - Building Heights** Draft Policy QD4 relates to tall buildings, including where they should be located within the Borough and the criteria that they must satisfy to be considered acceptable. The principle of including this policy within the Plan is supported in the context of the new London Plan Policy D9 requiring Local Plans to allocate suitable areas for the location of tall buildings.	Noted. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the	Policy QD4 amended throughout to ensure conformity with the London Plan, with revisions also informed by the Tall Buildings Study Addendum (2022). However Willow Way

			Draft Policy QD4 states that tall buildings will only be considered acceptable in-principle in the locations identified in Figure 5.1. The figure, which is reproduced below, considers only those locations as being appropriate for tall buildings. The same draft policy defines tall buildings as "*buildings that cause a significant change to the skyline and which:* *a. Are 30 metres or more in height, except in the Thames Policy Area where they are buildings 25 metres or more in height; or* *b. Are significantly taller than the prevailing height of buildings in the immediate and surrounding area.* As discussed latterly in this representation, Willow Way LSIS is earmarked for substantial redevelopment in the form of employment-led mixed-use development. However, when read alongside draft Policy QD4, there would not be support for any development which is significantly taller than the prevailing height of buildings in the immediate or surrounding area. The policy needs to align with the wider aspirations for strategic growth within the draft plan and not provide a potential barrier to development being brought forward on allocated sites. *LB Lewisham officer note: an extract of Figure 5.1 is included in the original representation. It shows that Willow Way LSIS falls outside of the tall building zone.* The emerging context is mixed as outlined at the outset of this letter however, when reading Part D(b) of Policy QD4 as currently drafted, any proposal for redevelopment on the Willow Way site would be unable to be 'significantly taller' than the prevailing height of buildings in the surrounding area. The supporting text at Paragraph 5.29 states that "*taller buildings are those that project above the prevailing heights of buildings and structures within a site's immediate and surrounding area (normally, but not exclusively, to 2 to 3 storeys above"*. Whilst there is *some* flexibility for tall buildings on Willow Way offered through the wording listed above, we would contend that this does not go far enough to achieve the development objectives set through the site allocation discussed below. Given that Willow Way is identified as a site for redevelopment, and is of a scale that can genuinely deliver meaningful regeneration and substantial public benefit in terms of employment uses, residential accommodation, affordable housing and public realm, there needs to be sufficient flexibility with regards to building heights. There will be significant pressure on sites being brought forward within Willow Way due to the requirement to be employment-led mixed use development and provide necessary affordable housing and public realm. By restricting building heights to circa 6-7 storeys through the currently drafted Policy QD4, would risk any development across the area not being viable.	Tall Buildings Study Addendum (2022). This includes the designation of specific areas suitable for tall buildings. The Study does not support the designation of Willow Way LSIS as suitable for tall buildings. Should a development proposal for a tall building come forward at this site, this would be assessed against the relevant development plan policies, and any departure from these considered on the basis of material considerations in line with the Planning and Compulsory Purchase Act Section 28(6).	LSIS continues to be identified as a location that is not suitable for tall buildings.

			We would request that Figure 5.1 is updated to reflect that Willow Way would be a suitable location for a tall building. This is not to say that the area would be awash with skyscrapers, as the suitability of a tall building proposal will still be managed in development control terms through Policy QD4 (parts a and b) which provide stringent controls to such applications. It may be that a few 'tall' buildings across the wider development site with other buildings subservient and in keeping with the surrounding scale may be an appropriate route forward to assist with wayfinding to the local centre. By enabling a tall building to be considered on-site in principle, this could unlock the development potential of the entire site and allow the anticipated significant benefits to be achieved, i.e. additional affordable housing and meaningful public realm. Without the ability to deliver a tall building on Willow Way, there is a risk that developments are not viable to be brought forward and the benefits of the site allocation are never achieved. The concept of context evolution is briefly discussed at Paragraph 5.35 of the draft Plan noting that there may be certain areas within the Plan that evolve over time which influences the character of a site or area once implemented. This however is potentially insufficient to stimulate initial redevelopment as it relies on incremental change over time.		
The Renewal Group (Carney Sweeney obo)	2 2	QD 04 Table 5.1	*Relates to Part 3, LNA SA 08* **Policy QD4 Building Heights** Firstly, this policy needs to have regard to the final changes to the new London Plan 2021 in relation to the definition of tall buildings and the final wording of policies relating to them. We note that part C of the policy refers to criteria QD4.B(e) - QD4.B(f) whereas in fact there is no (f). The policy needs to be amended in this regard. In relation to part B of the policy we consider that there is no basis for buildings to be of "*exceptional*" design and architectural quality. It is acknowledged that they should be of "*high quality*" design but the higher bar of "*exceptional*" is too high in this context. Also, we consider that the wording of B(e) should be altered to refer to "*unacceptable adverse impacts on the amenity of neighbouring properties*" (our emphasis) rather than just "*adverse impacts……..*". Guidance documents in relation to such matters always refer to the need to take a flexible approach and the current wording does not facilitate this. Again, in relation to part C of this policy, flexibility should be incorporated to respond to emerging areas of infrastructure improvements over the whole plan period, which may not be anticipated at present. Appropriate wording should be incorporated in this regard. Having regard to some of the comments above, changes should also be made to the various criteria in part F of the policy.	Noted. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022). This includes updates to the definition of tall buildings. The Council considers that the requirement for exceptional design quality is appropriate given the impact tall and taller buildings can potentially have.	Policy QD4 amended throughout to ensure conformity with the London Plan, with revisions also informed by the Tall Buildings Study Addendum (2022). Policy QD7 (Amenity) and Policy QD4 (Building heights) amended to refer to 'unacceptable adverse impact' as suggested.
The Renewal Group (Carney Sweeney obo)	2 2	QD 04 Table 5.1	Figure 5.1 comprises a Tall Buildings suitability plan. This plan does not take account of areas where the PTAL is planned to be increased over the plan period. For example, a new station on the Overground at Surrey Canal Road is planned imminently which will significantly improve the PTAL in this area. This is a highly	Noted. The Tall Buildings Study (2019) considered improvements in PTAL to	Policy QD4 amended throughout to ensure conformity with the London Plan, with

			relevant consideration for planned growth and the suitability of tall buildings in this area. Figure 5.1 needs to be amended accordingly.	inform the tall buildings suitability areas. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022).	revisions also informed by the Tall Buildings Study Addendum (2022).
SGN (Quod obo)	2 2	QD 04 Figure 5.1	*Relates to Part 3, LSA SA 01* *Tall Buildings* 5.7 Policy QD4 (E) states that tall building will only be considered acceptable in principle in locations identified in Figure 5.1, which excludes the gas work site but contains the adjacent Site Allocations 2 (Bell Green Retail Park) and 3 (Sainsbury's Bell Green). If land adjacent to the site is identified as appropriate for tall buildings, then this designation should be extended to the west to include the gas works site to ensure a comprehensive redevelopment of the area can be achieved. 5.8 Point C) outlines that where the prevailing height of buildings adjoining the site, as well as its immediate and surrounding area is expected to evolve in accordance with the spatial strategy for the Borough, proposals for taller building may be considered. In view of the strategic ambition for Bell Green and Lower Sydenham to become an Opportunity Area, and identification of the adjacent site allocations as appropriate for tall buildings in accordance with the emerging spatial strategy, there is clear justification for the gas work site allocation to be afforded similar tall building status. 5.9 Point D) defines tall buildings as being 30 meters or more in height. The main policy text of draft Policy QD4 B & D, and Paragraph 5.29 should be amended so that it is consistent with London Plan Policy D9 'Tall Buildings' which now also defines tall buildings as those that are over 6-storeys or 18 metres in height. The reason for this late change to the new London Plan was to ensure that the tall building policy does not undermine the incremental densification of areas, which is considered to be an appropriate way to meet housing need. 5.10 The following text to paragraph 5.29 should also be removed: ~~*Taller buildings are those that project above the prevailing heights of buildings and structures within a site's immediate and surrounding area (normally, but not exclusively, 2 to 3 storeys above).*~~	Noted. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022). The Council disagrees that the policy proposals around 'taller' buildings should be removed. It is considered appropriate that policies are in place to manage building heights for developments which are not defined as tall.	Policy QD4 amended throughout to ensure conformity with the London Plan, with revisions also informed by the Tall Buildings Study Addendum (2022).
SGN (Quod obo)	2	QD 04	*5.11* Finally, point G states that *"Tall buildings must be delivered through a masterplan process in order to ensure that they are appropriately located both within a site and wider locality, designed to a high quality standard and effectively managed".*	Noted. Given their scale and impact, it is considered appropriate to require tall buildings to be informed and delivered through the masterplan process.	Policy QD4 amended to provide further clarification around requirements for masterplan, with cross-reference to Policy DM4 (Comprehensive

			5.12 Again, we raise concern as to the soundness of this policy in absence of any Masterplan for Bell Green and Lower Sydenham, which as prescribed in draft Policy QD4 will guide future development.		development and master planning).
QUOD (Landsec obo - Lewisham Shopping Centre)	2	QD 04	**Building Heights** 9.4 Landsec support Reg 18 Plan Figure 5.1 which identifies the site as a location appropriate for tall buildings and specifically its unrestrictive nature in determining what heights (in storeys) would be acceptable. 9.5 The Council published a draft tall buildings study (February 2021) as part of its evidence base to the Reg 18 plan which provides a methodology for determining the appropriate scale and location of tall buildings within Lewisham. This is based on site suitability and sensitivity. The site undoubtedly meets all the criteria, as follows: High PTAL – PTAL 6; Proximity to Bakerloo Line Extension – Adjacent to transport cluster; Town Centre location – Located in a major town centre and potential for Metropolitan town centre classification; Opportunity area location – Located in an Opportunity area; Growth area location – Located in a Growth area; Characterised by building height and tall building clusters – Located in an existing tall building cluster; Proximity to Green and Open Space – Close to Green/Open Space; Good Cycling Transport Accessibility Level – Benefits from a reasonable level of accessibility to railway and London Underground stations by cycling; Site allocation – It is an allocated site; Outside a World Heritage Sites and Buffer Zone – Located outside World Heritage Site and Buffer Zone; Outside a Conservation Area – Located outside a Conservation Area; Outside an Area of Special Local Character – Located outside an Area of Special Local Character; Listed Buildings – Does not contain any listed buildings; LVMF viewing corridor and consultation areas – Outside the LVMF viewing corridor and consultation areas; Local landmarks and local view buffers – Outside the local landmarks, local views and local view buffer; Varied Surrounding Building Heights – Lewisham has one of the widest spectrums of building heights; and Lower ground (topography) – The site is located on areas of lower ground therefore is less sensitive to the impacts of tall building proposals. 9.6 Given the above, we believe that there should be no limit to building heights at this location. 9.7 At draft Policy QD4 F (c) 'Building Heights', proposals for tall buildings will be required to demonstrate that the development is designed with building heights that are sensitive to the sites immediate and wider context having regard to figure 5.2 (sensitivity map). Although this map is a result of the layered sensitivity analysis carried out in respect to the draft tall buildings study, this map is unclear and confusing. It would assist if the legend is amended accordingly.	Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which aligns with the London Plan. The Study will inform amendments to Policy QD4 Building Heights and relevant site allocations.	Local Plan amended to take account of the Tall Buildings Study as well as provide supporting text on tall buildings delivered through clusters of tall buildings.

			9.8 We request that the main policy text of draft Policy QD4 B & D is amended so that it is consistent with London Plan Policy D9 'Tall Buildings' which now also defines tall buildings as those that are over 6 storeys or 18 metres in height. The reason for this late change to the new London Plan was to ensure that the tall building policy does not undermine the incremental densification of areas, which is considered to be an appropriate way to meet housing need. The following text to paragraph 5.29 should also be removed: ~~*Taller buildings are those that project above the prevailing heights of buildings and structures within a site's immediate and surrounding area (normally, but not exclusively, 2 to 3 storeys above).*~~		
Tribe Student Housing (Avison Young obo)	2	QD 06	*Relates to Part 3, LNA SA 06* We also consider that the draft site allocation has underestimated the development potential of the site as a whole. A key objective (GG2) of the Publication London Plan is ensuring that development makes the best use of land by enabling the development of brownfield land, particularly in Opportunity Areas and proactively exploring the potential to intensify the use of land to support additional homes and workspaces including promoting higher density development. This is also consistent with the approach in the LBL draft Local Plan Policy QD6 which seeks a design-led approach to optimise site capacity. Therefore, on the basis that the Site comprises brownfield land in an identified Opportunity Area, high density development should be promoted in line with regional and local policy objectives. An increase in capacity (by following a design-led approach) beyond 189 units would also assist the Council in meeting their housing targets. The site allocation includes a parcel of land to the north of the Trundley's Road site, known as land at Juno Way. The current applications for the site are for the Trundley's Road site only. The residential application which is for 189 units, demonstrates that additional quantum could be achieved across both parcels of land.	Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. The capacities have been amended to reflect the planning consents granted for the site as well as the current pre-application. Optimal capacity for the site will be established at planning application stage through a design led approach.	Surrey Canal Road and Trundleys Road LSIS site allocation amended by increasing residential units to 274 and increasing employment floorspace to 2,890m^2.
Trundley's Road Ltd (Avison Young obo)	2	QD 06	*Relates to Part 3, LNA SA 06* We also consider that the draft site allocation has underestimated the development potential of the site as a whole. A key objective (GG2) of the Publication London Plan is ensuring that development makes the best use of land by enabling the development of brownfield land, particularly in Opportunity Areas and proactively exploring the potential to intensify the use of land to support additional homes and workspaces including promoting higher density development. This is also consistent with the approach in the LBL draft Local Plan Policy QD6 which seeks a design-led approach to optimise site capacity. Therefore, on the basis that the Site comprises brownfield land in an identified Opportunity Area, high density development should be promoted in line with regional and local policy objectives. An increase in capacity (by following a design-led approach) beyond 189 units would also assist the Council in meeting their housing targets. The site allocation includes a parcel of land to the north of the Trundley's Road site, known as land at Juno Way. The current applications for the site are for the Trundley's Road site only. The residential application which is for 189 units, demonstrates that additional quantum could be achieved across both parcels of land.	Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. The capacities have been amended to reflect the planning consents granted for the site as well as the current pre-application. Optimal capacity for the site will be established at planning application stage through a design led approach.	Surrey Canal Road and Trundleys Road LSIS site allocation amended by increasing residential units to 274 and increasing employment floorspace to 2,890m^2.

Fifth State and (Avison Young obo)	2	QD 06	*Relates to Part 3, LNA SA 16* ***Draft Policy QD6 – Optimising site capacity*** The Owners and Developer of 5-9 Creekside support draft Policy QD6 which requires a design-led approach to be taken to optimise site capacity and establish an appropriate development density. This is considered to broadly align with London Plan Policy D3, however further advocation of delivering higher density developments in appropriate locations should also be incorporated into this policy. Paragraph 5.46 of the draft Local Plan states that the policy seeks to ensure that *'the limited supply of land is used effectively and efficiently […] in order to meet the Borough's future needs and to support the delivery of the spatial strategy, it will be necessary to facilitate higher density development in appropriate locations'.* As such, <u>support for higher density development should be explicitly expressed within the policy wording itself</u>. <u>In addition, it would be helpful if draft Policy QD6 could explain that the indicative development capacity figures proposed as part of all the draft Site Allocations are not intended to be a cap on development quantum, rather a broad indication of capacity. The policy wording should therefore state that the overall quantum will therefore be established through a design led approach to development to make most efficient use of land (in line with NPPF paragraph 122).</u>	Noted. The Local Plan approach to establishing the optimal capacity of the site is considered to be in general conformity with the London Plan. It is not considered appropriate to explicitly state supporting higher densities in the policy, as higher density development may not always result in the most optimal use of land. The Plan clearly states that for the site allocations, "The site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies".	No change.
Notting Hill Genesis (Savills obo)	2	QD 06	*Relates to Call for site* A mixed use redevelopment of the site could be achieved through making the best use of site and NHG therefore supports the principle of draft Local Plan Policy QD6 (Optimising Site Capacity) which sets out that development proposals must demonstrate that the design-led approach has been used to optimise a site's capacity, in accordance with the London Plan Policy D3.	Support noted.	No change.
Barratt London and the Church Commissioners (Avison Young obo)	2	QD 06	*Relates to Part 3, LCA SA 20* **Draft Policy QD6 Optimising site capacity** Barratt London and the Church Commissioners are strongly supportive of a design-led approach to optimise site capacity and to establish an appropriate development density and consider this aligns with London Plan Policy D3.	Support noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	2	QD 06	*Relates to Part 3, LEA SA 03* GHL strongly welcomes the Council's approach to site optimisation through a design-led approach (Policy QD6, Optimising site capacity), which reflects the Government's objective of *"significantly boosting the supply of homes"* (Paragraph 59 of the NPPF).	Support noted.	No change.
Bellway Homes Ltd and Peabody Developments	2	QD 06	*Relates to Part 3, LNA SA 14* With regard to Policy QD6 (Optimising site capacity) of the draft Local Plan, our Client is supportive of a design-led approach to optimising a site's capacity. However, we would suggest that when considering comprehensive redevelopment proposals within site allocations, more flexibility should be	Noted. Draft Local Plan policy QD6.B identifies the criteria used to determine optimal capacity of a site, which are considered to be	No change.

Ltd (Savills obo)			afforded with regard to density. As such, we request the following text is added to Policy QD6 (the additions are shown underlined): *A flexible approach to density guidance should be taken when considering comprehensive redevelopment proposals within site allocations, with the optimum density of a development resulting from a design-led approach.* Making this change would provide flexibility and it will ensure that the draft Local is **effective** in its delivery.	in conformity with the London Plan. The Local Plan is not prescribing densities and therefore the approach is considered to be sufficiently flexible. Paragraph 13.9 of the draft Local Plan clearly states that for the site allocations that, "The site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies."	
Artworks Creekside (Avison Young obo)	2	QD 06	*Relates to Part 3, LNA SA 16* ***Draft Policy QD6 – Optimising site capacity*** As noted above, Policy QD6 must include explicitly emerging contexts as part of the appraisal process in ensuring a design-led approach to be taken to optimise site capacity and establish an appropriate development density. The post-amble of the Policy talks of undertaking a series of appraisal for establishing the optimum site capacity and our pre-application engagement with the Council to date has been through this iterative process.	Agree that the emerging local context should be taken into account in the design led approach.	Draft Local Plan policy QD1 and supporting text amended to provide clarification that development proposals should have regard to existing and emerging context, recognising that the character of sites and areas may evolve over time in accordance with the spatial strategy.
Selkent Holdings (Daniel Watney LLP)	2	QD 06	*Relates to Part 3, LWA SA 09* **Policy QD6 – Optimising Site Capacity** We welcome Policy QD6 relating to optimising site capacity particularly through demonstration that the design-led approach has been used to optimise such capacity. We feel this should influence the development parameters of individual site allocations and draft policies to understand their true potential which is why we request latterly in this representation that the capacities identified in the site allocation are made clear that they should be informed by more detailed assessments of capacity.	Noted. Paragraph 13.9 of the draft Local Plan clearly states for the site allocations that, "The site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies."	No change.
Transport for London	2	QD 06	**QD6 Optimising Site Capacity**	Support noted.	No change.

Commercial Development			TfL CD are supportive of Policy QD6 criterion Ac which requires development to consider "*Public Transport Accessibility Levels*, *taking into account current levels and future levels expected to be achieved by the delivery of planned public transport infrastructure*".		
SGN (Quod obo)	2	QD 06	*Relates to Part 3, LSA SA 01* 5.6 SGN welcomes the design-led approach that Lewisham have taken in respect to optimising site capacity (draft policy QD6 'Optimising Site Capacity') which includes the appraisal of design options as per the London Plan.	Support noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	QD 06	**Optimising Site Capacity** 9.9 Landsec welcomes the design-led approach that Lewisham have taken in respect to optimising site capacity (draft policy QD6 'Optimising Site Capacity') which includes the appraisal of design options as per the London Plan.	Support noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	2	QD 07	*Relates to Part 3, LEA SA 03* Policy QD7 (Amenity and Agent of Change) states development proposals must demonstrate how they will protect and, wherever possible, enhance the amenity of existing and future occupiers, as well as the amenity of neighbouring properties. Part B sets out that development proposals will be required to positively address amenity through a design-led approach in order to achieve the following: a) Make appropriate provision of privacy both for users of the development and those in neighbouring properties, ensuring development does not result in unreasonable levels of overlooking; b) Ensure adequate provision for and seek to optimise outlook for users of the development; c) Ensure adequate levels of ventilation, daylight, sunlight and open aspects including provision of private amenity space where appropriate; and d) Minimise and appropriately mitigate disturbances associated with the construction and operation of the development including noise, vibration, odour, fumes, dust, artificial light and site waste. Whilst GHL acknowledges the importance of safeguarding residential amenity, it must be recognised that development may result in some impact on the amenity of neighbouring properties, particularly in urban contexts; not least within areas where higher density development is actively encouraged. As such, Policy QD7 should consider whether impacts of proposed development on amenity are acceptable within the physical and planning context of a site, and accounting for the wider benefits of the development and other policies contained within the Lewisham Local Plan Review. We therefore consider that part B of Policy QD7 should be reviewed.	Noted.	Local Plan policy on Amenity and Agent of Change amended to reflect that development should not have an unreasonable adverse impact on amenity.
SEGRO (CBRE Limited obo)	2	QD 07	*Relates to Part 3, LNA SA 04* 4. Agents of Change SEGRO are encouraged by the Council's inclusion of Policy QD7 (Amenity and Agent of Change) as this will ensure development proposals do not compromise the operational capacity of existing impact generating uses, including industrial. We recommend that this policy explicitly references ensuring the 24/7 operation of SILs is not threatened by new development, and also recommend that this requirement is cross referenced within the site allocations for mixed use development surrounding SILs – for example Surrey Canal Road and Trundleys Road, Timber Yard, Evelyn Court and Neptune Wharf, which are all located in	Noted. It is agreed that the Local Plan should include additional Borough-wide policies around protection of SIL/LSIS in respect of amenity it is not necessary to include specifics for every site allocation. The Local Plan must be read as a whole.	Local Plan Part 2 Economy and Culture policies amended to include additional requirements on amenity specifically in relation to protecting the function and effectiveness of SIL and LSIS, and SIL on a 24-hour basis. This will work

			proximity to Deptford Trading Estate. The design requirements for residential elements of these development should require specific measures to be included such as high-performance acoustic glazing, mechanical ventilation and amenity spaces positioned well away from the SIL. These site allocations should also include a requirement for legal agreements, conditions and even noise easements that uphold the agents of change principles and protect existing uses from any potential conflicts created by incoming residents.		together with Amenity and Agent of Change policy.
Cockpit Arts (The Planning Lab obo)	2	QD 07	*Relates to Part 3, LNA SA 14* • We query whether this policy sufficiently considers/protects the amenity of *future neighbouring* occupiers/uses where elements of a masterplan are being brought forward at different times by different owners/developers. Strengthening this policy in this regard will ensure that the development of parts of larger sites is not unduly stymied and ensure that the potential of development sites can be maximised in line with policy.	Noted. The Draft Local Plan policy QD07 supporting text provides that proposals will be expected to take account of existing and proposed future uses, for example, by considering land use principles established by planning consents or site allocation policies.	To aid policy implementation, Policy QD07 supported text amended to refer to consideration given to unimplemented planning consents and site masterplans.
QUOD (Landsec obo - Lewisham Shopping Centre)	2 2 2	QD 07 QD 08 QD 09	**Amenity Considerations** 9.10 Landsec are supportive of draft policies QD7 'Amenity and Agent of Change'; QD8 'Noise and Vibration' and QD9 'External Lighting' (including the corresponding policy narrative) which are not tightly restricted by specific standards, rather they include flexibility that allows the optimisation of housing delivery whilst ensuring that good quality amenity is addressed.	Support noted.	No change.
The Renewal Group (Carney Sweeney obo)	2	QD 08	*Relates to Part 3, LNA SA 08* **Policy QD8 Noise and Vibration** In relation to part B of this policy, instead of stating that " *new noise and vibration generating development must be appropriately located away from noise sensitive uses and suitably demonstrate that measures will be implemented to mitigate any adverse impacts"*, we consider that the policy should read "*New noise and vibration generating development **should** be appropriately located away from noise sensitive uses **and/or** suitable demonstrate that measures will be implemented to mitigate any adverse impacts" (our emphasis)*. There are many roads, rail lines and other noise generating developments/activities across the borough and such a change to the policy will ensure that these do not unnecessarily preclude development.	Noted. Agree that policy should be amended to continue to protect amenity whilst ensuring this does not unnecessarily preclude development from coming forward.	Local Plan Amenity and Agent of Change policy amended to better align with wording in London Plan. As well, policy amended to make clear noise sensitive development sited away from existing noise generating uses or activities, and if not possible providing suitable separation and acoustic design measures.
L&Q Group	2	QD 11	*Relates to Call for site* *Infill and backland sites, back gardens and amenity spaces* Draft LBL Policy QD11 on infill and back land sites, back gardens and amenity spaces is restrictive and could impact on the number of applications on small sites, particularly in relation to the blanket retention of trees. Sites should be assessed on a case by case basis, to assess the appropriateness of trees to be retained.	Noted. The draft policy QD11 is considered sufficiently flexible to allow development to come forward. To aid implementation, the policy requirement for tree retention on back gardens and amenity spaces cross-references the other Local Plan policy on Urban	No change.

				greening and trees - this encourages that trees are retained but it does not require all trees to be retained.	
GHL (Leegate) Limited (Frank Knight obo)	2	QD 11	*Relates to Part 3, LEA SA 03* Policy QD11 (Infill and backland sites, back gardens and amenity areas) sets out the approach proposed to development on infill and backland sites. The Council will support this type of development, where the proposed use is appropriate to the Site and compatible with land uses in the site's immediate vicinity; and the development has a clear urban design rationale. GHL supports this policy in principle, especially in relation to their development aspirations along Carston Close. This policy aligns with the national and regional approach of optimising the use of previously developed land.	Support noted.	No change.
Fifth State and (Avison Young obo)	2	HE 01	*Relates to Part 3, LNA SA 16* ***Draft Policy HE1 – Lewisham's historic environment*** The Owners and Developer of 5-9 Creekside support the thrust of draft Policy HE1 which seeks to preserve or enhance Lewisham's historic environment. Part B of the policy provides a simplified version of the assessment of potential impacts from the key heritage tests outlined in NPPF paragraphs 193 to 197, which will be the relevant tests against which planning decisions will be made should the proposed development lead to either substantial or less than substantial harm. The policy therefore aligns with the national and strategic framework and we have no further comment to make at this time.	Support noted.	No change.
Fifth State and (Avison Young obo)	2	HE 02	*Relates to Part 3, LNA SA 16* ***Draft Policy HE2 – Designated heritage assets*** We recognise that Conservation Areas are subject to statutory protection under Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990, which states that *'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'.* The 1990 Act and NPPF paragraphs 200-201 also recognise that new development can benefit the character and appearance of a conservation area through enhancements. Part E of draft Policy HE2 states that *'the demolition of buildings or structures that make a positive contribution to the character or appearance of a conservation area will be resisted'*. Fifth State do not agree with the wording of this criterion as drafted as it fails to accurately reflect how the impact of development proposals on a conservation area should be assessed. The impact of development proposals on a conservation area must take into account the development proposals as a whole, i.e. the impact of demolition as well as the impact of the replacement proposals (as established through Dorothy Bohm v SSCLG (2017)). Even in cases where the building or feature proposed to be demolished is identified as making a positive contribution to the area, it is also necessary to consider the effect of the replacement proposals, as if the contribution made by the replacement is equivalent or better than existing, this would result in no harm or a heritage benefit. As such it is suggested that Part E of the policy is rephrased to better reflect the relevant heritage tests, as set out below: *'Buildings or structures that have been identified to make a positive contribution to the character or appearance of the conservation area should be retained*	Disagree. There is no requirement to repeat guidance from the NPPF. The proposed wording relates specifically to the NPPF test for non-designated heritage assets and does not address the test for designated assets, i.e. Conservation Areas. The Local Plan provides a positive framework for preserving the historic environment and the policy seeks to avoid the demolition of buildings that have been identified to make a positive contribution to Conservation Areas.	No change.

			wherever possible, and where buildings and structures are proposed to be demolished the impacts of the demolition should be balanced against the impacts of the replacement proposals.'		
Artworks Creekside (Avison Young obo)	2	HE 02	*Relates to Part 3, LNA SA 16* ***Draft Policy HE2 – Designated heritage assets*** Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990, which states that *'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that (conservation) area'*. The 1990 Act and NPPF paragraphs 200-201 also recognise that new development can benefit the character and appearance of a conservation area through enhancements. Given that 2 and 3 Creekside fall within a Conservation Area, it is imperative that draft Policy HE2 is compliant with the NPPF. Part C of draft Policy HE2 states that '*Proposals involving the retention, refurbishment and reinstatement of features that are important to the significance of a Conservation Area will be supported'*. Clearly, not all features can be retained within a redevelopment proposal within a Conservation Area. The post-amble differentiates between 'original or other features'. The complexities of redevelopment schemes will require the Council to apply this Policy criteria with flexibility based upon the objectively understood importance of any such features. Part E of draft Policy HE2 states that *'the demolition of buildings or structures that make a positive contribution to the character or appearance of a conservation area will be resisted'*. Artworks Creekside do not agree with the wording of this criterion as drafted as it fails to accurately reflect how the impact of development proposals on a conservation area should be assessed. Given the Dorothy Bohm v SSCLG (2017)) judgement, it is also necessary to consider the effect of the replacement proposals, as if the contribution made by the replacement is equivalent or better than existing, this would result in no harm or a heritage benefit.	Comments relating to Part C are noted. There is no requirement to repeat guidance from the NPPF. The Local Plan provides a positive framework for preserving the historic environment and the policy seeks to avoid the demolition of buildings that have been identified to make a positive contribution to Conservation Areas.	No change.
Fifth State and (Avison Young obo)	2	HE 03	*Relates to Part 3, LNA SA 16* ***Draft Policy HE3 – Non-designated heritage assets*** The Owners and Developer of 5-9 Creekside note that the wording of draft Policy HE3 Part A which identifies that *'development proposals will be supported where they preserve or enhance the significance of a locally listed building or other non-designated heritage asset, and the asset's setting'* goes beyond the NPPF Paragraph 197 test which states that *'the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'*. As outlined in our comments above, it will be necessary for a balancing exercise to take place to assess the impact of the loss of a designated or non-designated heritage assets which must be considered against the replacement development proposal, as well any public benefits which arise from the development proposals. We consider that Part B of draft Policy HE3 should be redrafted to reflect Paragraph 197 of the NPPF, which requires a balanced judgement to be taken	Noted. The Plan is in line with NPPF paragraph 190 which states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. There is no need to replicate the tests in paragraph 197 of the NPPF as this will be taken into account when determining applications.	No change.

			(rather than specifically looking to preserve or enhance the significance of a non-designated heritage asset).		
Artworks Creekside (Avison Young obo)	2	HE 03	*Relates to Part 3, LNA SA 16* ***Draft Policy HE3 – Non-designated heritage assets*** Artworks Creekside note that the assessment criteria contained within draft Policy HE3 goes beyond the test of para. 197 of the NPPF which notes that '*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.* Instead, the draft Policy HE3 is requiring an assessment which goes above and beyond the requirements of the NPPF.	Noted. The Plan is in line with NPPF paragraph 190 which states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. There is no need to replicate the tests in paragraph 197 of the NPPF as this will be taken into account when determining applications.	No change.
Phoenix Community Housing (BPTW obo)	2	HE 03	**Heritage** In our previous representations we objected to the inclusion of a policy that identifies and protects Areas of Special Local Character, considering that Conservation Area designations provide a comprehensive level of policy protection for sites which meet the necessary criteria and which are considered appropriate for designation. A new level of protection for sites not considered suitable for Conservation Area designation could inhibit the ability for development, particularly in areas where the majority of potential sites are on previously developed or infill sites. This concern is exacerbated by the higher housing requirement figures dictated by the New London Plan and so we strongly re-iterate that this and any policy which could discourage development on previously developed land should be avoided. The policy requirements set out under 'High Quality Design' should be sufficient to ensure proposals suitably integrate with the surrounding context and character. Many of the proposed ASLCs are in South Lewisham, where such designations would detract from the area's potential for 'sensitive intensification', thus reducing the effectiveness of the spatial strategy for this part of the borough.	Areas of Special Local Character already exist within the adopted Local Plan and are covered in the draft plan in policy HE3 (D) and paragraph 6.33. Paragraph 39 of the Planning Practice Guidance Historic Environment allows local authorities to identify non-designated heritage assets which can be buildings, monuments, sites, places, areas or landscapes which have a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets. Areas of Special Local Character fall within this category and sensitive intensification will not be prohibited by their identification.	No change.
L&Q Group	2	Section 7	*Relates to Call for site* 4.3 Housing *Meeting Lewisham's housing needs* L&Q supports LBL's commitment to meet and exceed the London Plan target of 1,667 net completions a year over the next 10 years. We also support LBL priority for genuinely affordable housing through directing development to those areas identified in the spatial strategy in the Borough, including the allocations of strategic sites.	Support noted.	No change.

Tribe Student Housing (Avison Young obo)	2 2	HO 01 HO 08	*Relates to Part 3, LNA SA 06* Policy HO1 sets out that Lewisham is required to meet the draft London Plan housing targets of at least 16,670 net housing completions between 2020-2030 (or 1,667 net completions per year). Moreover, draft Policy HO8 sets out that PBSA can contribute towards LBL achieving its housing targets where 2.5 PBSA bedspaces is equivalent to 1 conventional residential unit. This is consistent with the approach in the draft London Plan. We support this approach on the basis that PBSA is providing a type of accommodation for which there is a growing need. The provision of PBSA also helps free-up the conventional housing stock, further assisting the borough in meeting its housing target.	Support noted.	No change.
Trundley's Road Ltd (Avison Young obo)	2 2	HO 01 HO 08	*Relates to Part 3, LNA SA 06* Policy HO1 sets out that Lewisham is required to meet the draft London Plan housing targets of at least 16,670 net housing completions between 2020-2030 (or 1,667 net completions per year). Moreover, draft Policy HO8 sets out that PBSA can contribute towards LBL achieving its housing targets where 2.5 PBSA bedspaces is equivalent to 1 conventional residential unit. This is consistent with the approach in the draft London Plan. We support this approach on the basis that PBSA is providing a type of accommodation for which there is a growing need. The provision of PBSA also helps free-up the conventional housing stock, further assisting the borough in meeting its housing target.	Support noted.	No change.
L&Q Group	2	HO 01	*Relates to Call for site* In respect to the Part C (b) Policy HO1 sets out proposals on allocated sites must comply with site allocation requirements and will be resisted where they do not. Whilst welcomed, we consider the Part C (b), and any other policies governing site allocations, should clearly recognise the capacities are indicative and that proposals may exceed these indicative capacities whilst still broadly complying with site allocations. i.e. capacities should not be taken as upper development limits. A failure to do so could limit housing, particularly affordable housing, being delivered on the site and be out of step with the Council's overall aspiration to optimise sites capacity (Policy QD6).	Noted. The policy requirement is considered necessary to ensure the delivery of the spatial strategy. Part 3 of the draft Local Plan makes clear that with respect to the site allocations, the site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies.	No change.
L&Q Group	2	HO 01	*Relates to Call for site* L&Q welcomes the flexibility being applied to studio flats (Policy HO1 E), recognising their suitability as part of larger schemes, in highly accessible areas, where a wider mix of units (including family housing), can be offered.	Support noted.	No change.
(Avison Young obo)	2	HO 01	*Relates to Part 3, LCA SA 25* **Policy and Site Allocation Review**	Despite an increase in the London Plan housing	Local Plan amended to appropriately refer to

			Policy HO1: Meeting Lewisham's Housing Needs The emerging Plan should be prepared in accordance with the policies detailed within the NPPF (Paragraph 35). As such, policies relating to housing growth and the identified of housing need should be underpinned by the standard methodology as detailed in Paragraph 60, unless a justified alternative approach is agreed. The calculation is confirmed in the national planning guidance. Notwithstanding this, the strategic framework (London Plan, 2021) sets out the housing targets for the London Borough's over the next 10 years. The London Plan was prepared during the transitional arrangements associated with the introduction of the standard methodology and is therefore based on the London Strategic Housing Market Assessment underpinning the Plan. The policy wording associated with the emerging local context should be updated to reflect the adopted London Plan's targets: 1,667 per year. We note that the Council's housing trajectory detailed in the latest Authority Monitoring Report (January 2021) is applied against the previous London Plan's (2016) housing targets (1,385) and therefore does not meet their latest strategic target. Indeed, the Council recognise at Paragraph 2.7.10 of the AMR (2021) that: *"The Council will need to work with developers and its partners to find an additional supply of longer term sites to bridge the gap between the supply that is currently anticipated and the adopted London Plan target. This will become ever more important as the annual housing target for Lewisham is set to increase significantly to 1,667 per annum, once the Draft London Plan is adopted."* The proposed development site therefore presents an important opportunity to assist in the Council's housing delivery against Lewisham's identified strategic housing need, as set out in the remainder of these representations (see Identification of Sites for Co-Location section).	target, the Regulation 19 Local Plan identifies specific deliverable and developable sites with capacity to meet the Borough's strategic housing target over the plan period. The council can demonstrate a five year housing land supply and has included a Housing Trajectory within the Plan.	the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been amended to remove references to the Local Housing Need (LHN) figure and the standard methodology. Local Plan amended to include an up-to-date Housing Trajectory and five year housing land supply.
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	2	HO 01	*Relates to Call for site* **Policy HO1 Meeting Lewisham's Housing Needs** Draft Policy HO1 sets out the Council's strategic housing target, under which the Council outlines two housing targets. The first is the now adopted London Plan (2021) minimum target of 16,670 net housing completions between 2020 and 2030, which is equivalent to 1,667 per year. The second is the Local Housing Need (LHN) figure calculated in the 2019 Lewisham Strategic Housing Market Assessment (SHMA) (2019), which establishes a minimum annual need of 2,334 net units per annum. We also note that the revised standard methodology was published by the Government on 16 December 2020, which identifies an annual need of 4,178 dwellings. We would recommend the Council refers to a single strategic housing target, so that the Plan is unambiguous. This should also be expressed for the total Plan period. This is important for monitoring the Council's performance in housing delivery once the Plan is adopted and to ensure the target is achieved. The supportive text to Draft Policy HO1 states that: *"We have identified specific large sites which have the potential capacity to deliver approximately 25,000 net new homes. When combined with trend-based*	Despite an increase in the London Plan housing target, the Regulation 19 Local Plan identifies specific deliverable and developable sites with capacity to meet the Borough's strategic housing target over the plan period. The council can demonstrate a five year housing land supply and has included a Housing Trajectory within the Plan.	Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been amended to remove references to the Local Housing Need (LHN) figure and the standard methodology. Local Plan amended to include an up-to-date Housing Trajectory and five year housing land supply.

			windfall delivery rates in the Borough, there is sufficient capacity to meet and exceed the draft London Plan housing target over a 15-year period; however the phasing of development will be an important consideration. Meeting the NPPF Local Housing Need figure poses a significant challenge, given Lewisham's unique circumstances, particularly the need for strategic transport infrastructure to unlock development potential in areas, and to optimise the capacity of sites". The above makes clear that the Council has not identified sufficient land to meet the minimum housing target that has now been imposed through the adoption of the London Plan across the Plan period. We note that for a Plan to be found sound it must be positively prepared, which means a Plan should seek to meet the area's objectively assessed needs. This has not been achieved by the Regulation 18 Plan. We remind the Council that the NPPF (Paragraph 123) makes clear that where there is an anticipated shortage of land for meeting identified housing needs such as in this case, policy-makers must: *"Ensure that developments make optimal use of the potential of each site. In these circumstances… plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible".* In order for the Plan to contribute to achieving sustainable development, and for the Council to meet its substantial minimum housing targets, it is incumbent on LBL to properly assess and make allocations for appropriate redevelopment sites through the Local Plan. This should be reflected in an acknowledgement that the Council must focus on allocating additional land for residential development, including on designated employment land given it represents the largest stock of brownfield land to meet the forecast unmet need. The Council must re-consider its policy approach to address this and we comment on specific employment policies below.		
Notting Hill Genesis (Savills obo)	2	HO 01	*Relates to Call for site* *Residential* New homes is a key priority for the Mayor of London. As such, Table 4.1 of the London Plan sets out a minimum 10 year housing target for Lewisham of 16,670 new homes over a 10 year period (2019/20 to 2028/29) which equates to 1,667 per annum. We note this is reflected in Policy HO1 of the draft Local Plan, and sets out that the Council will ensure that the London Plan minimum ten-year housing target is met and exceeded. Whilst NHG strongly supports the delivery of new homes in Lewisham, we note that the Standard Methodology Housing Need (published 16 December 2020 by MHCLG) outlines a considerably higher local housing need in Lewisham of 4,178 new homes per annum. It goes to follow that there is a significant opportunity for a mixed use redevelopment at the site which could contribute to these ambitious housing targets. NHG also strongly support the delivery of new affordable homes within Lewisham. NHG acknowledges the Council's threshold approach to viability in accordance with the London Plan Policy H5 and the principle of increased affordable housing, and for new homes to be genuinely affordable, subject to viability. Again, it goes to follow that there is a significant opportunity for a mixed use redevelopment at the site to deliver new affordable homes which could contribute to Lewisham's affordable homes target.	Despite an increase in the London Plan housing target, the Regulation 19 Local Plan identifies specific deliverable and developable sites with capacity to meet the Borough's strategic housing target over the plan period. The council can demonstrate a five year housing land supply and has included a Housing Trajectory within the Plan.	Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been amended to remove references to the Local Housing Need (LHN) figure and the standard methodology. Local Plan amended to include an up-to-date Housing Trajectory and five year housing land supply.

			We note that draft Local Plan Policy HO1 (Parts D and F) seek to provide a mix of unit sizes and housing choice with reference to the Council's Housing Strategy or other strategies.		
Barratt London and the Church Commissioners (Avison Young obo)	2	HO 01	*Relates to Part 3, LCA SA 20* **Chapter 7 Housing** **Draft Policy HO1 Meeting Lewisham's housing needs** Barratt London and the Church Commissioners are strongly supportive of Part A of Draft Policy HO1 which requires development proposals to make the best use of land and optimise the capacity of housing sites in order to ensure the London Plan housing target is met and exceeded, and delivery against Lewisham's Local Housing Need figure is maximised. Barratt London and the Church Commissioners are also supportive of Part D of this policy which requires development to deliver an appropriate mix of housing within the site and locality having regard to individual site circumstances (including location, character, and nature and scale of development proposed). We request the criteria listed under Part D for consideration of housing mix be expanded to acknowledge the following parts of London Plan Policy H10 Part A which state that applicants and decision-makers should have regard to: • the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity. • the role of one and two bed units in freeing up existing family housing We consider this will ensure an appropriate mix of housing can be secured, which contributes to the Borough's housing target and need.	Support noted. The Council has prepared an updated SHMA that has considered the need for family housing and smaller units. The results of the study have influenced the policies in the Local Plan.	Local Plan amended with new target size mix for affordable housing. Local Plan amended to clarify locations where a higher proportion of 1 and 2 bed units may be appropriate, in accordance with the London Plan and as suggested.
GHL (Leegate) Limited (Frank Knight obo)	2	HO 01	*Relates to Part 3, LEA SA 03* 2. Housing The Lewisham strategic housing target is set by the London Plan, which stipulates a ten-year target of 16,670 net housing completions over the period 2020 to 2030 (Policy HO1 Meeting Lewisham's housing needs). Policy HO1 suggests that delivery against Lewisham's Local Housing Need figure will be maximised. The Council explains that the LPA will increase housing supply by allocating strategic sites for new housing development and ensure that all development proposals make the best use of land and optimise the capacity of housing sites, in line with proposed Policy QD6 (Optimising site capacity). GHL strongly supports the housing delivery strategy and reminds the LPA that Lewisham's centres, such as Lee Green District Centre, have a number of locations where a significant number of homes could be delivered. These homes would be in sustainable locations close to shops, services, amenities and public transport. The homes could be delivered across a range of unit sizes and include affordable housing. The Leegate Shopping Centre is being promoted by GHL to provide increased residential units, and GHL reminds the Council that the associated increase in residential units in the Lee Green District Centre would also enhance the centre's long-term viability, which is a significant planning benefit.	Support noted.	Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been revised remove references to the Local Housing Need (LHN) figure and standard methodology.
GHL (Leegate) Limited	2	HO 01	*Relates to Part 3, LEA SA 03* Policy HO1 adds that a provision of a mix of unit sizes is required to meet local need, including the target unit size mix that is set out in the Council's Housing	Noted. The Council has prepared a SHMA Update (2022) that has considered	Local Plan policy HO1 amended to provide further clarification

(Frank Knight obo)			Strategy. Furthermore, LBL requires the delivery of family housing units (3+ bedrooms) on schemes of 10 or more dwellings and LBL states that they will resist proposals where they comprise an overconcentration of 1 or 2 bedroom units. Policy HO1 does propose a number of instances where deviations from the preferred housing mix will be acceptable, such as areas benefitting from high PTAL, or sited in a locality that benefits from good provision of larger and family sized units; or the proposal is the only housing format deliverable owing to site constraint (studios proposed are of an exceptional design quality). GHL seeks further clarification as to what the Council would define as an 'overconcentration' of 1 or 2 bedroom units in Lewisham. GHL acknowledges the need for a mix of house types, sizes and tenures to meet identified needs. However, it is important that those policies of the Lewisham Local Plan Review provide sufficient flexibility and avoid stifling the delivery of new homes as the result of overly prescriptive and restrictive policies. Any such policy would not be deliverable over the plan period, and therefore not be effective. There should also be an allowance within the policies for diversification of residential mix to come forward, which can contribute significantly towards the Borough's housing offer overall. GHL recognises the Council's evidence, provided by the Strategic Housing Market Assessment. However, the interpretation of this evidence is resulting in an overly prescriptive policy which can potentially affect a schemes viability, especially in respect of private housing. GHL can confirm there is demand for a mix of housing typologies, generally for smaller units than larger units, and we encourage the Council to engage with the developers to understand this demand. In the interests of providing balanced communities, understanding market conditions, will help inform a more aspirational yet flexible policy approach. It is therefore very important that any policies relating to housing mix allow for the final mix to be agreed between the applicant and Council on a site-by-site basis. This would reflect paragraph 11 of the NPPF, which promotes a flexible approach to housing mix, recognising that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.	the need for smaller units and identifies a target mix of unit sizes and informed the policy in the Regulation 18 document. It is acknowledged that further clarifications could be provided to make clear that housing mix will be considered on a case by case basis, and to provide further policies and guidance around the issue of overconcentration.	around how overconcentration will be assessed. Local Plan policy HO1 amended to make clear that appropriate housing mix will be considered on a case-by-case basis.
LaSalle Investment Management (Savills obo)	2	HO 01	*Relates to Part 3, LSA SA 10* ***HO1 Meeting Lewisham's housing needs*** Policy HO1 identifies that "*…development proposals must make the best use of land and optimise the capacity of housing sites in order to ensure*: *a. draft London Plan minimum ten-year target of 16,670 net housing completions over the period 2020 to 2030 (or 1,667 net completions per year) is met and exceeded; and* *b. That delivery against Lewisham's Local Housing Need figure is maximised".* LSIM support the intention to facilitate an increase in housing supply within Lewisham through the allocation of sites in order to help meet the strategic target for the Borough. It is noted that such targets are not a ceiling and are encouraged to be exceeded.	Support noted.	No change.

			Policy HO1 also states that the Council will keep under review the Local Plan strategic housing target to ensure conformity with the London Plan. LSIM welcomes the Council's commitment to such a review and would advocate that the Local Plan should respond appropriately to take account of any evidence of unmet housing needs within the Borough.		
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	2	HO 01	*Relates to Part 3, LNA SA 14* **Residential** Our Client is fully supportive of Site Allocation 14 providing new homes (C3). We also note that new homes is a key priority for the Mayor of London. As such, Table 4.1 of the London Plan sets out a minimum 10 year housing target for Lewisham of 16,670 new homes over a 10 year period (2019/20 to 2028/29) which equates to 1,667 per annum. We note this is reflected in Policy HO1 of the draft Local Plan, and sets out that the Council will ensure that the London Plan minimum ten-year housing target is met and exceeded. Whilst our Client strongly support the delivery of new homes in Lewisham, we note that the Standard Methodology Housing Need (published 16 December 2020 by MHCLG) outlines a considerably higher local housing need in Lewisham of 4,178 new homes per annum. It goes to follow that there is a significant opportunity for a residential-led mixed use redevelopment at the site which could contribute to these ambitious housing targets.	Noted.	Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been revised remove references to the Local Housing Need (LHN) figure and standard methodology.
Tavern Propco (Savills obo)	2	HO 01	*Relates to Part 3, LSA SA 11* **Housing Need and Delivery** The adopted London Plan (January 2021) has a target of 52,000 homes per annum across London over the plans ten-year period. On 29 January 2021, the Secretary of State (The Rt Hon Robert Jenrick MP) issued the Mayor of London (Sadiq Khan) with a letter confirming that he is content for the London Plan to be formally published, but set out a strong message to the Mayor of London that housing supply across London needs to be improved. In his letter to the Mayor of London, the Secretary of State commented: "…you still have a very long way to go to meet London's full housing need, something your plan clearly and starkly fails to achieve. Londoners deserve better and I will be seeking to work with those ambitious London Boroughs who want to deliver over and above the housing targets you have set them; something that would not have been possible without my earlier directions." Given the above, it is clear that the London Plan is unambitious with its adopted housing targets and boroughs, including Lewisham, should be seeking to exceed the minimum targets of the London Plan to achieve the GLA's identified need of 66,000 homes over the ten-year period. It is considered that this provides strong justification for amendments to the housing supply targets set out in emerging Policy HO.1 and discussed below. **Emerging Policy HO1 'Meeting Lewisham's Housing Needs'** Emerging Policy HO1 states that development proposals must make the best use of land and optimise the capacity of housing sites in order to ensure that the draft London Plan minimum ten-year target of 16,670 net housing completions	Noted. Since the Regulation 18 consultation closed, the London Plan 2021 has come into force. This established the Borough's strategic housing requirement.	Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been revised remove references to the Local Housing Need (LHN) figure and standard methodology.

			over the period 2020 to 2030 (or 1,667 net completions per year) is met and exceeded. The adopted London Plan's yearly housing targets for Lewisham (1,667) are significantly below the Standard Methodology Housing Need figure of 4,178 per annum. This represents an uplift of 150.6% above the housing target in the London Plan. **Requested Amendment:** It is strongly considered that Lewisham should be working to achieve the housing need figures identified within the Standard Methodology and that emerging Policy HO1 should be amended with an increased housing target to reflect this. The Lewisham's South Area Site Allocation 11: Downham Coop can help contribute to the increased supply of housing in Lewisham over the plan period by setting the number of residential units development of the site should deliver as a minimum of 42 units.		
The Renewal Group (Carney Sweeney obo)	2	HO 01	*Relates to Part 3, LNA SA 08* **Policy HO1 Meeting Lewisham's Housing Needs** This policy needs to refer to Build to Rent housing and include support for it, in line with the London Plan. Build to Rent developments have a vital role to play in meeting London's housing needs and should be actively supported in Lewisham.	Agree.	Local Plan Policy HO1 amended to reference Build to Rent.
SGN (Quod obo)	2	HO 01	*Relates to Part 3, LSA SA 01* **Chapter 7 - Housing** 5.13 SGN supports the need to significantly increase housing delivery in Lewisham as set out in draft Policy HO1 'Meeting Lewisham's housing needs' and supports the requirement for Councils to work positively and proactively with key stakeholders and development industry partners. This aligns with NPPG guidance (Para. 59) that sets out the Government's objective of significantly boosting the supply of homes. 5.14 The inclusion of the London Plan minimum ten-year target of 16,670 net additional homes in draft Policy HO1 is supported. We would however also urge the Council to review its minimum housing requirement in light of the NPPF standard methodology for Local Housing Need. It is considered that the Standard Methodology housing need figure based on the adopted London Plan (2,964 net additional homes) should be included in the main policy text of draft Policy HO1. SGN propose an amendment to draft Policy HO1 A (a and b) as follows: *5.15 "A The ~~draft~~ London Plan ~~minimum ten-year~~ housing delivery target of 16,670 net housing completions over the period 2020 to 2030 (or 1,667 net completions per year) is ~~met and exceeded~~ a starting point and delivery exceeding this level should be encouraged. This is in order to maximise housing delivery against the NPPF Standard Methodology target of 2,964 net homes per annum.*	Noted. The NPPG clearly states that the London Plan is responsible for establishing London-wide need and disaggregating this to individual Boroughs. Therefore, the current position for the borough is a minimum housing need figure of 1,667 based on the 2021 London Plan target.	Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been revised remove references to the Local Housing Need (LHN) figure and standard methodology.
SGN (Quod obo)	2	HO 01	5.16 Point C) of draft Policy HO1, outlines that in increasing housing supply new residential development will be directed to Opportunities Areas, that Lewisham will support new housing development on site allocations and will make the best use of land and optimise housing site capacities. SGN is fully supportive of Policy HO1 C) but again reinforce that the full optimisation of the gas works site cannot be realised in absence of allocation of the site as an appropriate location for tall buildings.	Noted.	Tall building policies and suitability zones changed
Phoenix Community	2	HO 01	**Housing** PCH strongly support the Council's aspirations of maximising the supply of additional homes in the Borough to meet and exceed the annual housing target set out in the New	Noted. The Local Plan is seeking to boost the	No change.

Housing (BPTW obo)			London Plan. A concentration of these in Opportunity Areas defined by the London Plan is supported, however the proportion to be directed *to 'strategic corridors…consistent with the spatial strategy for the borough'* (as per draft policy HO1) will need to be re-assessed following the Bakerloo line extension postponement. In the interim period, this plan should direct a greater proportion to sensitive intensification of residential areas, small sites, and estate renewal and regeneration. To that end, policy HO2 (Small Sites) should at least echo the London Plan's target of 379 homes per year on small sites in Lewisham *as minimum,* and should consider upping this target given that it is premature to allocate strategic-scale sites on the future Bakerloo line.	delivery of small housing development beyond the historic delivery levels, aiming not only to meet the London Plan small sites target but to exceed it. The Borough's small sites target is signposted in the policy supporting text.	
Phoenix Community Housing (BPTW obo)	2	HO 01	The New London Plan stipulates that boroughs should only set prescriptive dwelling size mix requirements (no. bedrooms) for low-cost rent homes, however the consultation document is not prescriptive on this, and this flexibility is welcomed by PCH.	Noted.	Local Plan amended to set a target size mix for affordable homes, informed by the SHMA Update.
Tetra Tech Planning (John Lyon's Charity obo)	2	HO	**Housing** **Do you agree that the Local Plan has identified all of the issues around housing?** We note the absence of a specific policy considering "Build-to-Rent" schemes. The private rented sector is growing in the Borough and across London and it would not be prudent to dismiss this sector. In accordance with London Plan Policy H11, a stand-alone policy for this sector should be included.	Disagree that a new stand-alone policy on Build to rent is needed although there is merit in referring to this tenure within the Local Plan	Local Plan Policy HO1 amended to make reference to Build to rent.
Phoenix Community Housing (BPTW obo)	2	HO 01	Part E of policy HO1 restricts the subdivision of 3+ bedroom units into smaller units subject to a number of caveats. We would suggest the inclusion of 'smart lettings' into this list, as piloted by PCH at its Hazelhurst Court development and proposed in the Council's draft Housing Allocations Policy, to reflect the role of new 1 and 2-bed housing in freeing up underused family housing on other sites within a management portfolio. There should be greater flexibility to enable some of these re-found family units to be subdivided into further affordable housing if meeting the other design criteria set out in the policy.	Noted. Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham SHMA. This makes clear the local need for family sized housing units. Given recent housing delivery records which suggest a significant number of 1-2 bed units coming forward, it is considered appropriate to guard against the loss of existing family sized housing units of 3+ beds.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	HO 01	**Housing Mix** 10.6 Landsec are concerned that draft Policy HO1 E does not go far enough to provide sufficient flexibility on housing mix for sites located in sustainable locations such as Town Centres. 10.7 Policy H10 'Housing Size and Mix' of the London Plan provides greater clarity on where smaller unit developments might be supported (e.g. at Part 6 of the London Plan, it considers that one and two bed units are generally more appropriate in locations which are closer to a town centre) with the emphasis on the applicant to demonstrate acceptability.	Disagree. Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham SHMA. This has informed the content of the Local Plan and now includes a target unit size mix for affordable housing. There is clear evidence that the majority of demand is for family sized housing.	No change.

L&Q Group	2	HO 02	*Relates to Call for site* *Optimising the use of small housing sites* Policy H2 London Plan specifies that increasing the rate of housing delivery from small sites is a strategic priority and boroughs are advised to proactively support well designed homes on small sites. Under Policy HO2, LBL recognise the potential contribution of small housing sites to housing supply, including affordable homes. Whilst L&Q is supportive of this, the policy needs to recognise that viability of smaller schemes is often very finely balanced, considering the high cost of development vs the level of units that can be delivered on a site. As such, some of the development requirements in Policy HO2 could be onerous for small sites (such as the requirement to provide green infrastructure measures and maximising urban greening) and can make the difference on whether a scheme can be progressed. The LBL needs to maintain flexibility to allow innovative design solutions on small sites. We therefore welcome more bespoke guidance, which recognises that smaller sites have a distinct set of issues compared to larger sites and require a more flexible approach to bring these sites forward.	Support noted. The Council has adopted a Small Sites SPD to support the implementation of the development plan, and to boost the delivery of small sites in Lewisham. The Local Plan Viability Assessment indicates that the requirements can viability be delivered. Planning proposals will need to submit Viability Assessments where it is considered the policies cannot be satisfied.	No change.
GHL (Leegate) Limited (Frank Knight obo)	2	HO 02	*Relates to Part 3, LEA SA 03* Policy HO2 (Optimising the use of small housing sites) remarks that development of small sites will play an important role in increasing housing supply in Lewisham and supporting provision for a wide range of high quality and affordable homes. This policy outlines that the Council will prepare a suite of Supplementary Planning Documents to guide the sensitive intensification of small sites. GHL supports the proposals set out in Policy HO2 (Optimising the use of small housing sites).	Support noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	2	HO 02	*Relates to Part 3, LEA SA 03* GHL supports the provision of different housing types but requests that when drafted, the policy allows for flexibility and takes account of scheme viability on a site-by-site basis. In addition, the affordable housing tenure might change overtime in response to local needs, affordable housing policy / legislation and funding.	The policy incorporates flexibility by using words such as appropriate mix, target mix, reasonable proportion etc. Development proposals that do not to meet the target mix in terms of unit sizes and affordable housing can demonstrate their approach via viability assessments.	No change.
L&Q Group	- 2	General HO 02	We understand LBL are consulting on a Residential Small Sites SPD until 1 June 2021. We will submit detailed comments to the consultation itself, but note several key hurdles to small site developments which L&Q has faced including: • Additional planning requirements, which are appropriate on larger sites / schemes, often have an impact on viability / likelihood of planning application being implemented on smaller sites since margins can be less; • A blanket approach to requirements that can have longer term maintenance issues on smaller sites e.g. green roofs can lead to difficulties of maintenance for landlord and ultimately lead to increased service charge for residents; • Access arrangements to small sites – specifically in relation to devising appropriate fire and refuse strategies.	Noted. The preparation of the Small Sites SPD is outside the scope of the Local Plan.	No change.

QUOD (Landsec obo - Lewisham Shopping Centre)	2	HO 02	**10Chapter 7 Housing** 10.1 Chapter 7 of the Reg 18 Plan contains key policies on housing focusing on securing more genuinely affordable homes, boosting housing delivery and tailor housing to local communities. **Housing Delivery / Meeting Local Need** 10.2 Landsec supports the need to significantly increase housing delivery in Lewisham as set out in draft Policy HO1 'Meeting Lewisham's housing needs'. Landsec also supports the requirement for Councils to work positively and proactively with key stakeholders and development industry partners. This aligns with NPPG guidance (Para. 59) that sets out the Government's objective of significantly boosting the supply of homes. 10.3 Landsec supports the inclusion of the London Plan minimum ten-year target of 16,670 net additional homes in draft Policy HO1. Landsec acknowledges the importance of aligning local policy to the requirements in the London Plan. We would however also urge the Council to review its minimum housing requirement in light of the NPPF standard methodology for Local Housing Need. It is considered that the Standard Methodology housing need figure based on the London Plan (2,964 net additional homes) should be included in the main policy text of draft Policy HO1. Landsec proposes an amendment to draft Policy HO1 A (a and b) as follows: *"a The ~~draft~~ London Plan ~~minimum ten-year~~ housing delivery target of 16,670 net housing completions over the period 2020 to 2030 (or 1,667 net completions per year) is ~~met and exceeded~~ a starting point and delivery exceeding this level should be encouraged. This is in order to maximise housing delivery against the NPPF Standard Methodology target of 2,964 net homes per annum.* *~~b That delivery against Lewisham's Local Housing Need figure is maximised~~"* 10.4 As set out in draft Policy HO1, Landsec strongly supports the requirement to direct new residential development to Opportunity Areas, town centres and other well-connected and sustainable locations. In accordance with London Plan guidance, Landsec proposes that the wording around town centre development is strengthened. The London Plan sets out in detail the requirement for the development of town centres to be encouraged, particularly town centres that are undergoing transformative change, have projected declining demand or significant infrastructure planned (Policy SD9 'Town Centres: Local partnerships and implementation'). London Plan Policy SD6 'Town Centres and High Streets' also states that Council's should promote town centres by "identifying locations for mixed-use or housing-led intensification to optimise residential growth potential." 10.5 Landsec proposes the inclusion on an additional paragraph to draft Policy HO1 C, specifically for Town Centre development: *"C i. Encouraging the development of town centres, particularly town centres that are undergoing transformative change, have projected declining demand or significant infrastructure planned. The Council will work with strategic partners to promote town centres by identifying locations for mixed-use or housing-led intensification to optimise residential growth potential."*	Support is noted. Disagree that the standard method should be referred to in the policy and disagree with the proposed wording. Disagree with the precise wording but agree acknowledgement should be given to mixed use led growth in town centres.	No change.

L&Q Group	2	HO 03	*Relates to Call for site* *Genuinely affordable housing* L&Q is supportive of LBL's approach to affordable housing, including support for schemes which deliver 35% affordable housing, in line with the Fast Track route set out in the London Plan. The Council's preferred tenure split of 70% per cent genuinely affordable (social rent or London Affordable Rent) and 30% per cent intermediate (London Living Rent or Shared Ownership) is noted (HO3 E (b)). We consider that where an applicant is bringing forward significant levels of affordable housing on a site, suggested as 35% of higher, weight should be given to the overall affordable offer to allow greater flexibility on this tenure split. This should be reflected in the considerations at HO3 L, in addition to the current drafting which requires consideration on the existing level of housing tenure and mix in the area.	Support noted. Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham SHMA Update. It recommends a 70:30 tenure split, given the affordability pressures in the borough. Officers therefore disagree that the 70/30 tenure split should differ on sites where more than 35% of the units will be affordable housing. However, the Local Plan does provide flexibility to consider housing and tenure mix on a case-by-case basis. Draft Local Plan policy HO3 (Part L) sets out that the Council may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis.	No change.
L&Q Group	2	HO 03	All L&Q schemes are designed to be tenure neutral and we welcome the principles of HO3 M. As part of this, L&Q ensures the standard of amenity, communal spaces and playspace are equal across tenures and that residents have access to these. It should be noted in some instances, design and management constraints may limit residents having access to amenities and communal spaces across an entire scheme and it may be necessary to break these down on a block by block basis. For example, where courtyards are created on a block basis and access through the block is required to access that space, we may seek to limit access to just residents of that particular block in order to reduce risk of anti-social behaviour issues from unrestricted access by large numbers. However, every block would then have access to their own communal amenity space which will provide the appropriate open and play spaces required. This also enables security, building management and maintenance costs to be managed, and in turn service charges. As above, we recognise new play space in the public realm should be available for public access.	Support noted. The issues around management and access to spaces is noted and will be addressed through amendments to Policy QD2 on Inclusive and safe design.	Local Plan Policy QD2 amended to include criterion on appropriate management of private and communal amenity space, along with a reference to Government's National Design Guide and tenure neutral housing. In addition, HO3 amended to include a signpost to Policy QD2.
Tetra Tech Planning (John Lyon's Charity obo)	2	HO 03	The Charity fully supports the principle of affordable housing provision in new developments and its importance in creating successful communities.	Support noted.	No change.
Lendlease (Lichfields obo)	2	HO 03	*Relates to Part 3, LNA SA 02* **Housing** *Policy HO3 Genuinely affordable housing & HO5 High Quality Housing Design* While Lendlease is supportive of Lewisham's ambitions for high quality housing design, we note that significant parts of these policies are unnecessarily replicated from London Plan 2021 policy and supplementary guidance. In	Noted. The draft Local Plan policies have been included where they provide useful local interpretation, to aid the implementation of national policy or London	Local Plan reviewed and amended where appropriate to reduce repetition, thereby shortening the length of the Local Plan.

			particular, HO3 Part F is replicated from the London Plan 2021 Policy H5 (Threshold Approach to Applications). Much of HO5 is replicated from London Plan 2021 Policy D6 (Housing Requirements).	Plan policies. It is acknowledged that there is some duplication, however this is the approach also taken by other London Boroughs.	
Notting Hill Genesis (Savills obo)	2	HO 03	*Relates to Call for site* We also note that Policy HO3 (Part L) may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. NHG is supportive of the need to deliver a range of housing types, and is supportive of policies which adopt a flexible approach to housing mix. This will ensure that the draft Local Plan is **effective** and **deliverable**.	Support noted.	No change.
Barratt London and the Church Commissioners (Avison Young obo)	2	HO 03	*Relates to Part 3, LCA SA 20* **Draft Policy HO3 Affordable Housing** Barratt London and the Church Commissioners broadly support the alignment of this Draft Policy with the threshold approach to viability set out in London Plan Policy H5 and the Mayor's Affordable Housing and Viability SPG. Part E of Draft Policy HO3 currently identifies that, on large sites, affordable housing should be delivered at a tenure split comprising '70% genuinely affordable' and '30% intermediate (London Living Rent)', however, does later acknowledge that *"the Council may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis"*. Barratt London and the Church Commissioners strongly support the need for flexibility concerning these matters and support the principle of affordable housing tenure being determined on a case-by-case basis, and subject to site-specific considerations.	Support noted.	No change.
LaSalle Investment Management (Savills obo)	2	HO 03	*Relates to Part 3, LSA SA 10* ***HO3 Genuinely affordable housing*** Policy HO3 states that "the strategic target is for 50 per cent of all new homes delivered in Lewisham to be genuinely affordable". It should be recognised that the 50% figure is a strategic target to include affordable housing from all sources and not just that secured through planning obligations. A starting point of 35% provision would not fetter the Council's ability to negotiate for a higher level of provision where individual site circumstances justify such an approach.	Noted. This is reflected in the policy and the supporting text. The Local Plan specifies that a strategic target for 50 per cent of all new homes delivered in the Borough to be genuinely affordable. This is based on evidence of need, as set out in the SHMA Update 2022. We disagree that the starting point should be 35%. Instead, the Council seeks the maximum amount of genuinely affordable housing to be delivered on new housing developments, but acknowledges that proposals that achieve a minimum 35% affordable housing will be acceptable,	No change.

				in line with the London Plan threshold approach to viability.	
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	2	HO 03	*Relates to Part 3, LNA SA 14* The Clients also supports delivery of new affordable homes within Lewisham. The Client acknowledges the Council's threshold approach to viability in accordance with the London Plan Policy H5 and the principle of increased affordable housing, and for new homes to be genuinely affordable, subject to viability. We note that draft Local Plan Policy HO1 seeks to provide a mix of unit sizes and housing choice with reference to the Council's Housing Strategy or other strategies. We also note that Policy HO3 may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. Our Client is supportive of the need to deliver a range of housing types. To ensure flexibility, we consider the following text should be added to Policy HO1 (the additions are shown underlined): *A flexible and end-user driven approach to housing mix should be taken when considering comprehensive redevelopment proposals.* Making this change would provide flexibility and it will ensure that the draft Local Plan and site allocation can be **effective** in its delivery. We note that Policy HO3 (Genuinely affordable housing) sets out thresholds and criteria in the provision of affordable homes. Our Client's support the policy's approach that the provision of affordable homes is subject to viability.	Support noted. Local Plan will be amended to reflect that housing mix considered on a case by case basis, but not using the suggested text.	Local Plan amended to reflect that appropriate level of housing mix to be determined on a case-by-case basis.
Transport for London Commercial Development	2	HO 03	**HO3 Genuinely Affordable Housing** TfL CD is committed to delivering at least 50% affordable housing across its development portfolio in London and looks forward to working with the borough to bring forward appropriate levels of affordable housing on sites in our ownership.	Noted.	No change.
The Renewal Group (Carney Sweeney obo)	2	HO 03	*Relates to Part 3, LNA SA 08* **Policy HO3 Genuinely Affordable Housing** Affordable housing provided as part of Build to Rent developments in line with Policy H11 of the London Plan should be supported and needs to be set out in the Lewisham Local Plan.	Noted.	Local Plan Policy HO1 amended to reference Build to Rent.
SGN (Quod obo)	2	HO 03	*Relates to Part 3, LSA SA 01* 5.17 SGN support the strategic principles of Policy HO3. Point J) outlines that small sites of less than 10 dwelling units will be required to make a financial contribution towards the delivery of affordable housing and should seek to deliver this on-site. This requirement is contrary to Paragraph 63 of the NPPF and should be removed.	Noted. The Lewisham SHMA indicates a significant and acute need for more genuinely affordable housing in the borough. To help address this need, the Local Plan requires that new housing developments delivering less than 10 dwellings should seek to deliver on-site affordable housing wherever practical and feasible. Where provision	Local Plan amended with further details on affordable housing contributions for small sites.

				cannot be delivered on-site, a financial contribution will be sought. The Local Plan Viability Assessment indicates that the small sites contribution will not adversely impact on viability. Local Plan policy HO3 will be amended to provide further clarity on how the small sites contributions.	
Phoenix Community Housing (BPTW obo)	2	HO 03	The setting of affordable housing requirements and thresholds in line with the London Plan and the Mayor's threshold approach to viability is, of course, supported. The 70:30 tenure mix split between genuinely affordable and intermediate housing products is also supported, however there should be explicit policy support for maximising the genuinely affordable proportion. The NPPF definition of Affordable Rent as up to 80% of local market rent is unaffordable to many Londoners and so we would prefer to see the term 'low cost homes for Londoners on low incomes' (or similar) used instead of 'genuinely affordable' to describe the 70% portion. Clarity on rent levels and clearer definitions in the Plan would be welcomed by PCH residents. PCH is aware that Bellingham members are responding to the draft Plan and supports their proposal that genuinely affordable social rents are required. Similarly to wheelchair housing, we would welcome the insertion of flexibility that enables Housing Associations / Registered Providers to meet the 70:30 split across a portfolio of sites, given that site specific circumstances can often justify the introduction of shared ownership in such areas that meet the housing need of certain households with low annual incomes, whereas other areas may never be truly affordable to purchase. Further, there are long-term management cost savings in being able to wholly retain and manage, or wholly sell an affordable scheme. A more radical way of equipping Housing Associations to compete with major developers would be the introduction of building credits for over-provision of affordable housing that could be sold on to private schemes. In any case, we would encourage some additional policy recognition where affordable housing schemes deliver over and above the policy target. For example greater flexibility on mix of units (subject to demonstrating local housing need), or acknowledgment that any overprovision could be taken off-set at other developments within close proximity, enabling concentration of affordable units on the most appropriate sites within a wider estate infill strategy.	Support is noted. Rent levels are beyond the scope of the Local Plan. The Local Plan already seeks the maximum amount of genuinely affordable housing to be delivered on new housing developments. There is no need to change the definition of genuinely affordable as the Local Plan already acknowledges this to be social rent or London Affordable Rent only. Disagree with the need for building credits or for a 70:30 split across a portfolio of sites as the Local Plan already allows for flexibility as there can be alterations to the tenure and/or mix of affordable housing provision on a case-by-case basis, having regard to the existing levels of housing tenure and mix in the area, along with development viability.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	HO 03	**Affordable Housing** 10.8 Landsec supports the threshold approach to affordable housing and viability aligned to the London Plan as set out in draft Policy HO3 G 'Genuinely affordable housing'. However, at present the text regarding the benchmark existing use value does not make clear that a premium should be added to incentivise land to be released for redevelopment. Paragraph 4.5.3 of the London Plan states that the *"benchmark land value is based on the current use value of a site plus an appropriate site premium".* Landsec proposes that draft Policy HO3 G be amended as follows:	Noted	H03 Affordable Housing Policy amended to better reflect higher level policy

			"G Where the Viability Tested Route is used and a viability assessment is submitted to support the level of affordable housing provision made by a proposal, this must be based on a standard residual valuation approach, with the benchmark existing use value of the land taken as the existing (plus an appropriate premium to the landowner) /*alternative use value…"* 10.9 As set out in draft Policy HO3 M, Landsec agrees that new affordable housing development must be designed to a high-quality standard and homes should be indistinguishable from market units. Landsec however notes that, in line with leasehold law, private residents cannot subsidise amenities for affordable housing residents. The text should be amended to state that affordable residents will be given the option to access amenities if they are able / want to pay the service charge. Landsec propose the following revision to draft Policy HO3 M: *"M …Development should be sensitively integrated into the site and its surroundings, with affordable housing units being indistinguishable from market units in terms of quality of design and materials, space standards* and *access* ~~*and amenity provision*~~. All residents should be given the option to access onsite amenities." 10.10 Landsec agrees that for genuinely affordable housing (i.e. London Affordable Rent / SocialRent) residents should be provided with lifetime tenancies (Para. 7.34). Landsec seeks clarification that this does not apply to intermediate tenures which cannot have the same tenancy agreements as social rent (but do of course have other tenancy protections governed by separate law and policy). Landsec proposes the following amendment to Paragraph 7.34: *"7.34 … For genuinely affordable homes, we will seek that residents are provided with lifetime tenancies, ideally in perpetuity."* 10.11Landsec agrees that Shared Ownership housing costs should be demonstrably affordable (Para. 7.43). Landsec notes that Shared Ownership income thresholds should be linked to the London Plan and London Plan AMR. The London Plan AMR states in paragraph 3.74 that the Shared Ownership income threshold will be reviewed / updated on an annual basis. It is also considers that the affordability calculation be aligned to the formula in the London Plan AMR (annual housing cost should be no greater than 40% of a household's net income). Landsec proposes the following amendment to Paragraph 7.43. *"7.43 … Shared ownership products may also be an acceptable form of tenure, where the total monthly costs are demonstrably affordable. The affordability threshold for intermediate tenures should be aligned to the London Plan Annual Monitoring report which is updated annually. For dwellings to be considered affordable, annual housing costs, including mortgage payments (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40 per cent of a household's net income."*		
L&Q Group	2	HO 04	*Relates to Call for site* *Housing estate maintenance, renewal and regeneration* As a long-term landlord of the homes we develop, L&Q is committed to high quality living environments that can be maintained at decent standards whilst	Support noted.	No change.

			keeping services changes for residents' low. L&Q strongly support the aspirations of Policy H04.		
The Renewal Group (Carney Sweeney obo)	2	HO 05	*Relates to Part 3, LNA SA 08* **Policy HO5 High Quality Housing Design** Part G of this policy states that proposals for single aspect dwellings will be resisted and should only be considered in exceptional circumstances, where it can be suitably demonstrated that it will provide for a more appropriate design solution than a dual aspect dwelling. This policy goes further than the London Plan and associated design guidance, which seeks to avoid *north facing* single aspect dwellings (our emphasis), rather than all single aspect dwellings. There is no justification for resisting single aspect dwellings which face east, west and south and this policy needs to be amended accordingly.	Noted. Agree that the policy should be amended to provide greater flexibility for considering single aspect dwellings, whilst ensuring high standard of design and amenity.	Local Plan amended to remove 'exceptional circumstances' clause and make clear the requirements on single aspect dwellings, also signposting need to avoid north facing single aspect dwellings in line with London Plan guidance.
SGN (Quod obo)	2	HO 05	*Relates to Part 3, LSA SA 01* 5.18 SGN are generally supportive of draft Policy HO5 'High Quality Housing Design', although are concerned that the requirements of Part G are overly restrictive and exceed the requirement of the London Plan and its Housing Guidance. The draft policy includes requirements which may limit development unnecessarily and this should be reviewed.	Noted. Agree that the policy should be amended to provide greater flexibility for considering single aspect dwellings, whilst ensuring high standard of design and amenity.	Local Plan amended to remove 'exceptional circumstances' clause and make clear the requirements on single aspect dwellings, also signposting need to avoid north facing single aspect dwellings in line with London Plan guidance.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	HO 05	**Housing Standards** 10.14Landsec are generally supportive of draft Policy HO5 'High Quality Housing Design', although are concerned that the requirements of Part G are overly restrictive and exceed the requirement of the London Plan and its Housing Guidance. The draft policy includes requirements which may limit development unnecessarily. Landsec would like to work with the Council to explore further flexibility with regards this policy.	Part G has been amended to make the reference to single aspect dwellings more flexible, in line with the London Plan, and has been moved to a new policy QD8.	Local Plan Policy QD8 amended to make the wording more flexible.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	HO 06	**Care Home Accommodation** 10.12In respect of Policy H06 (Accommodation for older people) Landsec supports the requirement for specialist older person's accommodation where it meets an unmet local housing need. Such accommodation can play a valuable role in improving older persons' quality of life and contributing to mixed and balanced communities. Landsec however notes that the policy should recognise the challenges of delivering specialist older persons / care home accommodation compared to conventional housing. This includes larger space standards, additional fit out costs, and a less efficient net:gross ratio. The policy should be amended to acknowledge that, in order to secure older persons housing and the benefits it brings, flexibility may be needed in other policies including affordable housing. The requirement for flexibility is recognised in the London Plan which states that 'the tenure split requirement for specialist older persons housing may differ' from conventional housing (paragraph 4.13.11). 10.13It is proposed that Policy H06 should be amended to include an additional paragraph stating the following:	Disagree that there should be a trade-off between affordable housing and other forms of housing.	No change.

			"The challenges of delivering accommodation for older people are recognised. Development proposals for this type of housing will be assessed on a case-by-case basis, and policy flexibility will be considered where necessary (including for affordable housing). *Consideration will be given to the level of managed care provision, and onsite facilities."*		
Tribe Student Housing (Avison Young obo)	2	HO 08	*Relates to Part 3, LNA SA 06* The draft site allocation is for comprehensive employment-led redevelopment. Co-location of compatible commercial, residential and complementary main town centre uses. We consider there should be greater flexibility in the site allocation to reflect the suitability of other uses on the site, including PBSA. Draft Policy HO8 sets out that development proposals for PBSA must be appropriately located. The Trundley's Road site represents an appropriate location for PBSA as follows: • The site has a current PTAL rating of 2 but this is expected to improve to PTAL 3 upon completion of the New Bermondsey Station, situated along Surrey Canal Road which is 400m north-west of the Site. At present, the nearest rail stations are at New Cross and New Cross Gate, located approximately 1.2km south of the Site. These provide access to London Overground and National Rail services. Deptford and South Bermondsey stations are also located approximately 1.5km of the Site (east and west respectively) providing further access to National Rail services. The nearest bus stop which provides access to Route 225 are located adjacent to the Site on Trundley's Road; ▪ There are good walking, cycling and public transport links to nearby town and district centres which provide a good range of local services and amenities – as shown below: *LB Lewisham officer note: Table 1 and Figure 1: Proximity of the site to nearby town and district centres are included in the original representation. The table and figure show the location of, and details about, the centres at Lewisham, Deptford, New Cross and New Cross Gate.* ▪ The site is situated in a location where a number of committed developments are coming forward which include a significant amount of non-residential floorspace at ground floor. Therefore, in the emerging context the site will be in a location that benefits from good provisions of shops, services, leisure and community facilities appropriate to the student population – as shown below: *LB Lewisham officer note: Table 2: Committed developments in the vicinity of the site is included in the original representation. The table lists details about Timberyard Deptford Landings, Anthology Deptford Foundry, Convoys Wharf and Grinstead Road.* ▪ The provision of PBSA would not lead to an overconcentration in this location and would help create mixed and balanced communities when provided as part of a mixed-use development; and	The supplementary information is noted. Responses to other comments supporting this representation set out elsewhere in the Consultation Statement. Where a Local Plan site allocation makes provision for housing/residential uses, it does not normally specify the nature of this use. This will be established through the planning approvals process. Exceptions are made, for instance, with gypsy and traveller accommodation.	Surrey Canal Road and Trundleys Road site allocation updated to reflect the planning consented granted for the site.

			▪ The site is located in proximity to a number of Higher Education Institutions both within and outside the borough, including: <u>Higher Education Providers within a 1 mile radius of the site (15 minutes or less travel time by public transport):</u> o Goldsmiths College, University of London; and o Coventry University International Study Centre. <u>Higher Education Providers within a 2.5 mile radius of the Site (40 minutes or less travel time by public transport):</u> o The University of Greenwich (main campus); o Ravensbourne University London (main campus); o Trinity Laban Conservatoire of Music and Dance (main campus); o Kings College London (Guy's campus and Denmark Hill campus); o University of Sunderland (London campus); o University of Gloucestershire (London campus); o University of Cumbria (East India Dock Road campus); and o Queen Mary University of London (Whitechapel campus). In line with the above, the site has been identified by the University of London as a good location for student accommodation to serve Goldsmiths College, which has resulted in the planning application for student accommodation on the site. Moreover, the provision of PBSA on the site would free-up conventional housing stock for local people whilst contributing towards London-wide targets for PBSA bedspaces and overall housing need in the borough. There is an unmet demand for student accommodation and this is expected to increase due to COVID-19 and therefore the provision of PBSA will become more important in order to protect the existing conventional housing stock in the borough for family accommodation. We therefore consider the draft site allocation should be amended to include PBSA as an acceptable use on the site.		
Fifth State and (Avison Young obo)	2	HO 08	*Relates to Part 3, LNA SA 16* ***Draft Policy HO8 – Purpose built student accommodation*** The NPPF Paragraph 11 requires that: a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and b) that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. NPPF Paragraph 61 goes on to state that *'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including […] students).'* London Plan Policy H15 considers purpose-built student accommodation (PBSA) and requires Boroughs to ensure that local and strategic need for PBSA is addressed. The overall strategic requirement for PBSA in London is for 3,500 bed spaces to be provided annually over the plan period. Borough level targets for PBSA bed spaces are not provided as it is acknowledged that the location of need	Noted. The approaches in the draft Local Plan regarding PBSA are considered to be justified. The Lewisham SHMA points to the significant amount of PBSA recently delivered in the Borough including the proliferation of off-campus accommodation. Some 1,686 units were delivered and consented from 2016 to 2021, or an average of 337 per year. Additional	Local Plan supporting text amended to cross-reference London Plan policy H15 and details around Fast Track and Viability Tested routes for student housing.

			will vary over the plan period in line with higher education institution growth and expansion plans, together with the availability of appropriate sites. The Draft Local Plan is underpinned by the Lewisham Strategic Housing Market Assessment (2019) which considers the need for different types of accommodation and affordable housing needs drawing on demographic data and information provided from LBL and stakeholder consultation. The main finding in respect of student housing is that *'there is a significant student population in Lewisham that is partly housed in the private rented sector. The future housing requirements for this group is uncertain due to global economic issues and Brexit. Whilst pressure on the private rented sector from students has been mitigated by purpose built student housing, the sector will continue to be subject to extreme levels of demand from students unable to afford purpose built housing and the growing trend of non-student households being able to afford home ownership and being ineligible for social housing.'* The recommendation goes on to state that 35% of student housing should be provided as affordable units to help meet the needs of students. Whilst the SHMA provides an overview of student accommodation provided at Goldsmiths University and the University of Greenwich, no conclusion is drawn on the need for the delivery of PBSA in Lewisham. The SHMA acknowledges that there will continue to be pressure on the private rented sector to accommodate students, but does not identify how much PBSA is needed to address future need and demand. As such we question whether the NPPF requirement to objectively assess need for student housing has been adequately fulfilled by this assessment. As such, we would recommend transparency around student housing need is provided within the Draft Local Plan. Notwithstanding concerns regarding the evidence base, draft Policy HO8 provides a supportive basis for assessing development proposals for PBSA. The policy wording broadly reflects London Plan Policy H15 requirements for PBSA, which Fifth State endorses. Supporting paragraph 7.7 recognises that Lewisham is home to a number of further and higher education providers, particularly in north Lewisham which is home to Goldsmiths College, Trinity Laban Conservatory of Music and Dance and Lewisham College, as well as the nearby Greenwich University. As such it is considered that applications for PBSA coming forward in the north of the borough will be able to satisfactorily demonstrate that they will help to meet an identified strategic need for student accommodation (meeting policy requirement HO8 Part A(a)). Fifth State acknowledge that the Borough's main strategic requirement is for genuinely affordable, conventional housing, and that PBSA will be counted as delivering homes against the Borough's strategic housing target and will be counted on a 2.5:1 basis (i.e. two and half PBSA bedrooms to one unit of conventional housing). In respect of affordable student housing, Fifth State note that the London Plan policy (now H15) will be applied, which requires 35% affordable student	student bedspaces have been consented since then. The London Plan sets out an overall target for London of 3,500 PBSA units per annum across all boroughs. In this context, Lewisham is making a significant contribution to meeting London's needs for PBSA. A carefully managed approach to additional capacity is therefore required. Development proposals must clearly demonstrate that the provision will not lead to a harmful overconcentration of PBSA. It is also critical that they do not compromise or suppress the delivery of conventional housing, for which need in Lewisham is greatest. The London Plan makes clear that meeting the requirement for PBSA should not undermine policy to secure mixed and inclusive neighbourhoods.	

			accommodation in order to meet the Fast Track Route. Where this affordable target is not met, applications must follow the Viability Tested Route. However, paragraph 7.80 of the draft Local Plan states that *'at least 35% of PBSA should be secured as affordable housing'* but does not provide any further guidance on circumstances where 35% affordable student accommodation is not proposed. We request that this sentence is amended to read: *'London Plan Policy H15 provides that at least 35% of PBSA should be secured as affordable housing in order to follow the Fast Track Route (whereby no financial viability assessment is required to be submitted with the application). Should the proposals not meet the threshold of 35% affordable housing, applications must follow the viability tested route.'*		
QUOD (Landsec obo - Lewisham Shopping Centre)	2	HO 08	**Student Accommodation** 10.17Landsec supports the inclusion of a specific policy (draft Policy HO8 'Purpose Built Student Accommodation') for purpose-built student accommodation. 10.18Landsec does not support the need for priority to be given to sites located in proximity to the education institution(s) (draft Policy H08 B (c) (ii)). Whilst accessibility is an important test for student accommodation, this should not simply be measured by proximity – regard should also be had to other factors such as transport connections. The policy should be aligned with the London Plan which states *"Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes"* (Policy H15 'Purpose-built student accommodation'). Landsec proposes that draft Policy H08 paragraph B (c) (ii) be removed. 10.19Landsec supports the definition of affordable student accommodation being aligned to the London Plan at draft Policy H08 A (c). It is however proposed that the ability for a student led scheme to be 'Fast Track' is included in the main policy text. The London Plan (Policy H15) states "*to follow the Fast-Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land".* Landsec proposes an amendment to draft Policy HO8 A (c) as follows: *"A (c) Make provision for affordable student accommodation, including the ability to follow the Fast-Track route, in line with ~~draft~~ London Plan Policy H15 ~~H17~~ (Purpose-built student accommodation)."*	Disagree that sites in proximity to educational institutions should not be prioritised. No need to replicate policy from the London Plan regarding the fastrack route.	Local plan amended to make reference to maximum level of accommodation secured as affordable student accommodation.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	HO 09	**Large-Scale Purpose-Built Shared Accommodation** 10.15Landsec supports the requirement in Policy H09 'Housing with shared facilities (Houses in Multiple Occupation' that large scaled shared living accommodation development should only be permitted where it can be suitably demonstrated that there is a local need. Landsec notes that housing need should be assessed on a borough wide level and not just on a more local level. It is also noted that demand and not just need for this type of housing should be given material consideration. Landsec also proposes that the negative policy wording (Part D) to resist developments of this type should be removed. This is to align to Policy H9 'Ensuring the best use of stock' / Policy H16 'Large-scale purpose-built	Noted.	Local plan amended by removing negative policy wording and referring to local market demand.

			shared living' of the London Plan which seeks to ensure the best use of stock, expects boroughs to take into account the role of HMOs / shared living accommodation in meeting local and strategic needs and to promote the role of this type of housing in reducing pressure on other elements of the housing stock. 10.16Landsec proposes to amend Policy H09 D as follows: *"Large-scale purpose-built shared living accommodation in the Sui Generis Use Class will ~~generally be resisted as this type of use compromises opportunities to deliver conventional housing in the Borough. Development proposals will~~ only be permitted where it is suitably demonstrated that:* *(a) They meet an identified local need or demand for the type of housing proposed…"*		
(Avison Young obo)	2	Chapter 7	Chapter 7 confirms the approach to housing growth within Lewisham over the Plan period. Policy HO1 states "Development proposals must make the best use of land and optimise the capacity of housing sites in order to ensure: *a. The draft London Plan minimum ten-year target of 16,670 net housing completions over the period 2020 to 2030 (or 1,667 net completions per year) is met and exceeded; and* *b. That delivery against Lewisham's Local Housing Need figures is maximised."* Paragraph 7.5 confirms the Draft Plan was prepared at a time when confirmation over the approach to calculating housing need for the London Borough's had not been confirmed by the London Mayor and consequently the London Plan. Lewisham have therefore calculated local housing need in line with the NPPF's standard methodology (set out in the Strategic Housing Market Assessment). Paragraph 5.27-5.31 of the Strategic Housing Market Assessment 2019 provides a summary of the local housing need calculations underpinning the Local Plan. Paragraph 5.30 confirms that due to the substantial need identified as a result of applying the NPPF's standard methodology a cap based on current housing targets is introduced. This is applied to the housing need target based on the 2016 adopted local plan (1,939 dwellings per annum) and the 2017 draft London Plan (2,964 dwellings per annum). Paragraph 7.8 of the Draft Local Plan confirms that one of the aims of this Regulation 18 consultation is to better understand whether there are any additional sites that could feasibly be delivered within the Plan period and whether the strategic sites (site allocations) include in Part 3 of the Local Plan are deliverable and developable, particularly according to the indicative capacities of and timeframes set out.	Following the Regulation 18 consultation, and the adoption of the London Plan, the SHMA has been updated. It recognises that the London Plan is responsible for establishing London wide need and disaggregating this to London Boroughs. Therefore the current position for Lewisham is a minimum housing need figure of 1,667 p.a., based on the adopted London Plan.	Local Plan amended in line with the findings of the updated SHMA.
QUOD (Landsec obo - Lewisham Shopping Centre)	-	New policy Build to Rent	**Build to Rent** 10.20Landsec notes that there is no specific policy for Build to Rent. The importance and popularity of Build to Rent has grown significantly over recent years with London Plan (Policy H11 'Build to Rent') stating that *"Boroughs should take a positive approach to the Build to Rent Sector".* The London Plan identifies that Build to Rent developments can make a positive contribution to increasing housing supply by attracting inwards investment, accelerating delivery, and ensuring investment / placemaking through single ownership. The Build to Rent sector also provides better management standards and better-quality homes than much of the mainstream private rented sector.	Comments are noted.	Local Plan Policy HO1 amended to reference Build to Rent.

			10.21It is also important for the Reg 18 Plan to include some recognition of the fact that Build to Rent operates a different model to Build to Sale. Build to Rent relies on income through rent over a number of years, rather than an upfront return on sales. Because of this, in some circumstances Build to Rent may not be able to compete for land on an equal footing with speculative Build for Sale, as it may generate lower initial land values (London Plan Para.4.11.2). 10.22The viability constraints of Build to Rent are clearly defined in the draft Local Plan Viability Assessment (BNPP, 2019) which states *"that the viability of build to rent schemes is challenging".* The viability testing shows that in a significant number of cases, Build to Rent schemes are unable to provide any affordable housing. 10.23The site has been tested as part of this assessment and shows a maximum provision of between 0% and 10% affordable housing. The BNPP report states that viability testing excludes all 'exceptional costs' i.e. abnormal costs that are over and above standard build costs. It can therefore be assumed that the viability testing overstates the viable quantum of affordable housing that can be delivered on the site. 10.24Landsec proposes that a specific policy for Build to Rent be included in the Reg 18 Plan, aligned to Policy H11 in the London Plan. The key inclusions are as follows: - Affordable housing offer can be solely Discounted Market Rent (DMR). - The homes are held as Build to Rent under a covenant for at least 15 years. - To follow the Fast-Track Route, Build to Rent schemes must deliver 35% affordable housing with 30% of DMR homes to be provided at London Living Rent levels and 70% as a range of genuinely affordable rents.		
SEGRO (CBRE Limited obo)	-	Employment Land Study	*Relates to Part 3, LNA SA 04* 5. Deptford Trading Estate As there is a positive policy context for intensification on existing industrial sites, we are surprised the Lewisham Employment Land Study provides a Site Assessment for the Blackhorse Road SIL, which includes Deptford Trading Estate, as "this cannot be expanded". It is not clear whether this refers to the boundaries of the SIL or its capacity for intensification. If the latter, we note that the exercise undertaken to come to this conclusion is clearly a very high level one and is not qualified by any feasibility testing or environmental assessment. Although SEGRO are not actively promoting intensification of the site at this time, based on our significant development experience in London, we suspect this will be feasible subject to detailed matters including highways and design. Whilst this evidence does not form part of the development plan and will not form the basis of any decision making, we thought it prudent to highlight this point in our representations.	Noted. The Employment Land Study considered whether there was scope for expansion of selected employment land sites, taking into account surrounding land uses.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	2	Chapter 08	The "Economy" policies should also remove reference to the revoked Use Classes within A and B and make reference to the new Use Class E where appropriate.	Noted. The Local Plan will be amended to reflect and respond to these changes.	Local Plan Part 2 Economy and Culture section amended throughout to reflect and in response to changes to the Use

					Classes Order, including the new Class E.
Fifth State and (Avison Young obo)	2	EC 01	*Relates to Part 3, LNA SA 16* ***Draft Policy EC1 – A thriving and inclusive local economy*** Support and promotion of cultural and creative industries in the borough and the creation of the Lewisham North Creative Enterprise Zone (CEZ) covering the Lower Creekside area is strongly supported by Fifth State.	Support noted.	No change.
Cockpit Arts (The Planning Lab obo)	2	EC 01	*Relates to Part 3, LNA SA 14* • CA broadly endorses this policy and the link to Policy EC1 which specifically protects existing cultural venues and uses. • CA is generally supportive of policy that recognises and supports development that strengthens the local economic base. • We strongly support policy that requires provision of genuinely affordable workspaces for creative industries, independent makers, etc. We encourage LB Lewisham to consider the need to retain specific maker space (i.e. dirty/messy/noisy light industrial creative space) which has different requirements from digitally-driven creative businesses. • CA is supportive of the creation of Lewisham North Creative Enterprise Zone (see also response to LNA3) and policies that seek to protect and enhance creative industries in the borough.	Support noted.	No change.
Artworks Creekside (Avison Young obo)	2	EC 01	*Relates to Part 3, LNA SA 16* ***Draft Policy EC1 – A thriving and inclusive local economy*** Support and promotion of cultural and creative industries in the borough and the creation of the Lewisham North Creative Enterprise Zone (CEZ) covering the Lower Creekside area is strongly supported by Artworks Creekside.	Support noted.	No change.
The Renewal Group (Carney Sweeney obo)	2	EC 01	*Relates to Part 3, LNA SA 08* **Policy EC1 A Thriving and Inclusive Local Economy** We note that Part B(a) of this policy protects existing cultural venues and uses. It is important that such venues are only protected where they are viable and where this is a reasonable approach, having regard to other objectives. It is also important that meanwhile cultural venues and uses are not protected so as to prevent wider and final development proposals coming forward. It is important that the policy is adjusted to provide clarity on the matters raised above.	Noted. The Local Plan will be amended to reflect the importance of viability as key consideration for protection of cultural venues.	Local Plan amended to provide further clarification on protection of cultural venues and development proposals involving their loss, with viability of the venue a key consideration.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 01	11.1 Chapter 8 of the Reg 18 Plan contains key policies on the Economy and Culture focusing on protecting and revitalising industrial areas; making town centres more vibrant places and securing high quality affordable workspace. **A thriving and inclusive local economy** 11.2 Landsec welcome and support Lewisham's intention in draft policy EC1 'A thriving and inclusive local economy' to ensure access to high quality education, training and job opportunities and help facilitate the continued growth and development of local cultural, creative and digital industries. This aligns with Landsec's key priorities. 11.3 The Reg 18 Plan acknowledges the *"pressing need to reduce inequality and the negative consequences of deprivation in the Borough, and to ensure equality of opportunity, especially for those living in the Borough's most deprived areas"* (Para 2.18). The plan includes various references to ensuring equality of		

			opportunity through new development. Landsec welcome this and would seek to work with Lewisham to ensure this is the case.		
Notting Hill Genesis (Savills obo)	2 2 2 5	EC 02 Table 8.1 Figure 18.2 Schedule 4	**Lewisham Local Plan Regulation 18 Stage Main Issues And Preferred Approaches Document –representations** The draft Local Plan proposes that the site be subject to the following emerging planning policy designation: Forms part of a Locally Significant Industrial Estate (LSIS). We note the draft Local Plan references or illustrates the site and the wider Malham Industrial Estate in: Figure 3.9 (Borough-wide Spatial Strategy Plan); Table 8.1 (Lewisham's Employment Land Hierarchy) – LSIS; Figure 8.1 (Employment Land Hierarchy); Figure 18.2 (West Area Key Diagram); and Schedule 4 (Designated employment land).	Noted. Responses to additional representations set out elsewhere in the Consultation Statement.	No change.
Tribe Student Housing (Avison Young obo)	2 2	EC 02 Table 8.1	*Relates to Part 3, LNA SA 06* Draft Policy EC2 sets out the approach to the protection of employment sites and delivery of new workspace. Part D confirms that proposals for the co-location of employment and other compatible uses will only be supported at selected SIL sites, and where it can be suitably demonstrated that the requirements of draft London Plan policies E5 and E7 and other relevant Local Plan policies, are satisfied. This includes the Trundley's Road site currently within the Surrey Canal Road SIL, which is proposed to be de-designated from SIL (as discussed further below). On the basis that the Trundley's Road site is to be de-designated from SIL, Policy EC2 should clarify that the Trundley's Road site no longer forms part of the Surrey Canal Road SIL. For clarity, an additional row could be included in Table 8.1 specifically for such 'co-location sites'.	Noted. It is acknowledged that changes to the Local Plan are required for conformity with the London Plan. Specifically, to reflect that SIL sites are not suitable for co-location. Sites released from SIL through the plan-led process will be re-designated as LSIS, reflecting the draft Local Plan approach that such sites are important employment sites and development should ensure there is no net loss of industrial capacity.	Local Plan amended to reflect that SIL sites are not suitable for co-location. Sites released from SIL through the plan-led process will be re-designated as LSIS.
Trundley's Road Ltd (Avison Young obo)	2 2	EC 02 Table 8.1	*Relates to Part 3, LNA SA 06* Draft Policy EC2 sets out the approach to the protection of employment sites and delivery of new workspace. Part D confirms that proposals for the co-location of employment and other compatible uses will only be supported at selected SIL sites, and where it can be suitably demonstrated that the requirements of draft London Plan policies E5 and E7 and other relevant Local Plan policies, are satisfied. This includes the Trundley's Road site currently within the Surrey Canal Road SIL, which is proposed to be de-designated from SIL (as discussed further below). On the basis that the Trundley's Road site is to be de-designated from SIL, Policy EC2 should clarify that the Trundley's Road site no longer forms part of the Surrey Canal Road SIL. For clarity, an additional row could be included in Table 8.1 specifically for such 'co-location sites'.	Noted. It is acknowledged that changes to the Local Plan are required for conformity with the London Plan. Specifically, to reflect that SIL sites are not suitable for co-location. Sites released from SIL through the plan-led process will be re-designated as LSIS, reflecting the draft Local Plan approach that such sites are important employment sites and development should ensure there is no net loss of industrial capacity.	Local Plan amended to reflect that SIL sites are not suitable for co-location. Sites released from SIL through the plan-led process will be re-designated as LSIS.

Fifth State and (Avison Young obo)	2	EC 02	*Relates to Part 3, LNA SA 16* ***Draft Policy EC2 – Protecting employment sites and delivering new workspace*** Draft Policy EC2 seeks to safeguard land for commercial and industrial uses through retaining employment capacity within Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). We note that Lower Creekside is identified as a LSIS which are identified in Table 8.1 as providing for the borough's *'main local concentrations of commercial and industrial uses, which perform a niche role to support the functioning of the sub-regional and local economy. They provide workspace for micro, small and medium sized businesses, including the cultural, creative and digital industries. Protected for commercial and industrial uses, with priority given to Class B1 commercial and light industrial uses.'* Whilst forecast need has been identified for 21,800 sqm of net additional employment floorspace, it is noted that this refers to previous Use Class B1. This has since been replaced by Use Class E(g) (Use Classes Order 1987 as amended in September 2020). Draft Policy EC2 and the supporting text should be updated to reflect the latest use classes.	Noted. The Local Plan will be amended to reflect and respond to these changes.	Local Plan Part 2 Economy and Culture section amended throughout to reflect and in response to changes to the Use Classes Order, including the new Class E.
Fifth State and (Avison Young obo)	2	EC 02	*Relates to Part 3, LNA SA 16* Part B(a) of draft Policy EC2 states that within SIL and LSIS locations industrial capacity should be retained *'ensuring no net loss of floorspace and operational yard space along with intensifying employment development, including by facilitating the co-location of employment and other compatible uses through the plan-led process'.* The supporting explanatory text advises that safeguarding of employment land includes *'floorspace, yard space for operations and servicing space'.* Whilst the Owners and Developer of 5-9 Creekside support the principle of intensifying employment development and the ability to co-locate employment uses alongside other uses, they do not agree with an approach which seeks to protect yard space. London Plan Policy E7 supports efficient use of employment land to create additional industrial capacity, whilst having regard to operational requirements (including servicing). Figure 6.2 of the London Plan illustrates how existing industrial sites with large areas of yard space can be intensified through appropriate development. It is requested that the no net loss principle in draft Policy EC2 Part B(a) for floorspace and operational yard space is removed. This reflects the removal of the 'no net loss' approach from the draft London Plan E7, which has now been removed in the adopted version of the London Plan, which has been replaced for a requirement for intensification to provide additional capacity. The provision of 'additional capacity' could relate to the provision of replacement or additional floorspace or indeed an increase in the number or jobs or improvements to the quality of the workspace proposed. In respect of yard space, retention of existing yard space should not be sought as the delivery of necessary yard space and adequate servicing arrangements should be considered as part of the development proposals, depending on the type of employment space proposed (in line with draft	Noted. The London Plan provides that Local Plans can include provisions to retain SIL, LSIS and other industrial sites / capacity, taking into account local evidence. The Employment Land Study makes clear that Lewisham has experienced a significant loss of capacity and recommends that remaining capacity be retained. The no net loss principle is therefore considered to be justified and in conformity with the London Plan. However it is acknowledged that the draft Local Plan definition of industrial capacity should be amended for conformity with the London Plan.	Local Plan amended to provide new definition of industrial capacity and removal of 65% plot ratio.

			Policy EC3). The requirement for operational yard space varies between typology, use class and operator and to protect all operational yard space is overly restrictive and does not allow successful intensification of designated employment sites and also limits opportunities for co-location. It is noted that the explanatory text to Policy EC3 refers to the no net loss principle and a 65% plot ratio benchmark for assessing industrial capacity. Again the reference to the 65% plot ratio has been removed from the adopted version of the London Plan (following direction from the Secretary of State) and so these references should also be omitted from the draft Local Plan as they are not in conformity with the adopted policy position.		
The Arch Company Properties LP (Turley obo)	- 2 2	General EC 02 Table 8.1	**THE LEWISHAM DRAFT LOCAL PLAN (REGULATION 18, JANUARY 2021) & PROPOSED CHANGES TO THE ADOPTED POLICIES MAP (DECEMBER 2020) WRITTEN REPRESENTATIONS ON BEHALF OF THE ARCH COMPANY PROPERTIES LP** We write on behalf of The Arch Company Properties LP ("The Arch Company") with respect to the Public Consultation on the emerging Lewisham 'Pre-Publication' Draft Local Plan (Regulation 18, January 2021) [hereafter: "Draft Local Plan"] and Proposed Changes to the adopted Policies Map (December 2020), specifically with regard to the proposed addition of the Bermondsey Dive Under area to the Surrey Canal Road Strategic Industrial Location ("SIL").	Noted. Responses to additional representations set out elsewhere in this Consultation Statement.	No change.
The Arch Company Properties LP (Turley obo)	- 2 2	General EC 02 Table 8.1	***The Arch Company & LB Lewisham Portfolio*** It is considered that it will be helpful to provide some background information on The Arch Company nationally and their portfolio within the borough. The Arch Company acquired Network Rail's former commercial estate business in 2019. It is the landlord for more than 4,000 businesses across England and Wales, making it the UK's largest small business landlord, working with thousands of business owners, from car mechanics to bakeries and restaurants, who make a unique and vital contribution to the UK economy. In regard to the potential implications of the emerging Draft Local Plan it is of importance to identify that The Arch Company has substantial land holdings within the borough, specifically in the Bermondsey Dive Under area and the land proposed to be designated as an addition to the Surrey Canal Road SIL in order to release other parts of this designation for redevelopment, namely sites at Evelyn Court, Trundleys Road and the Apollo Business Centre. Being the majority land owner in this area and taking account of the full scale of The Arch Company's portfolio in the borough (totalling approx. 760,000 sq ft of business and employment space/land including, but not limited to, hundreds of railway arches), the potential implications of the Draft Local Plan are of significant importance. *LB Lewisham officer note:* Annex 1: The Arch Company's landholdings in and around Bermondsey Dive Under and the wider borough is included in the original *representation. The map shows the sites along the railway line.* The Arch Company's portfolio includes a large number of railway arches and associated land located to the south of Silwood Street within the Bermondsey Dive Under area. The railways arches and land in question have a lawful use of Classes E(g), B2 and B8 and, for the avoidance of doubt, for the planned leasing	Noted. Responses to additional representations set out elsewhere in this Consultation Statement.	No change.

			of this land our client will shortly be confirming this position via a Certificate of Lawfulness submission. As such, our client has a strong interest in ensuring that the Draft Local Plan creates a strong, flexible and ambitious, but at the same time realistic planning framework in order to facilitate the sustainable growth the borough requires.		
The Arch Company Properties LP (Turley obo)	- 2 2	General EC 02 Table 8.1	**Purpose of London's Strategic Industrial Locations and their typical requirements/attributes** For the avoidance of doubt, there are approximately 7,000 hectares of industrial land in London, of which approx. 50 per cent are designated as SIL1. Paragraph 6.5.1 of the London Plan describes SILs as *"the capital's main reservoir of land for industrial, logistics and related uses"* which are therefore given strategic protection because they are critical to the operation of the capital's economy. Policy E4(A) of the London Plan seeks to ensure *"[a] sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution"*. Policy E5 further sets out the purpose and preferred uses for SILs (as specified in Policies E4(A) and E5(C) and listed below) as well as its overall purpose which is *"to sustain [SILs] as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy"*. The London Plan also identifies other characteristics which are typical to SILs, in terms of the types of uses and locations summarised in **Table 1** below. *LB Lewisham officer note: Table 1: Typical Characteristics and Requirements for SIL Designations is included in the original representation. The table provides extracts from the London Plan relating to Types of Uses, Location and Logistics Function.* **Relevance for the Draft Local Plan & Recommendation/Suggested Amendments** As set out above, the primary purpose of SILs, according to the London Plan, is to 'support the functioning of London's economy' and its role and function can be summarised in the following way: • Make provision for *"industrial-type activities"* which includes Use Classes B1b/c (or Class E(g)(ii)/(iii)), B2, B8, waste management, utilities, transport, markets, low-cost industrial and related space for micro, small and medium-sized enterprises and R&D uses; • Activities which *"can raise tensions with other land uses, particularly residential development"*; and • Support sustainable movement of goods through being located *"close to the strategic road network and many are also well-located with respect to rail, river, canals and safeguarded wharves"*.	Noted. Responses to additional representations set out elsewhere in this Consultation Statement.	No change.
The Arch Company Properties LP (Turley obo)	- 2 2	General EC 02 Table 8.1	It is further considered that the vision and policies contained in the Draft Local Plan have the potential to meet the Council's ambitions of delivering good, sustainable growth in the borough during the plan period. Our client and we are more than happy to engage in positive and pro-active discussions with LB Lewisham if this is considered to assist the Council in preparing a sound and	Noted. Responses to additional representations set out elsewhere in this Consultation Statement.	No change.

			deliverable new Local Plan, and to bring forward new development across their portfolio over the coming years. Please do not hesitate to contact Turley should you require any further information or wish to discuss these representations.		
The Arch Company Properties LP (Turley obo)	2 2 -	EC 02 Table 8.1 Proposed Changes to the adopted Policies Map para 5.5	***Draft Policy EC2 (Protecting employment sites and delivering new workspace), Table 8.1 & Proposed Changes to the adopted Policies Map (December 2020)*** Chapter 8 of the Draft Local Plan sets out the Council's ambition for a thriving economy and the protection and/or potential of employment and industrial land. To this extent, it is noted that the Council proposes the release of three individual sites (Evelyn Court, Trundleys Road and the Apollo Business Centre) from the overarching Surrey Canal Road SIL for redevelopment to provide a mix or *co-location* of uses including employment and/or residential. Given the protection of SIL and requirements contained in the London Plan (i.e. Policy E4) for its release and/or substitution, the emerging Local Plan and associated proposed changes to the adopted Policies Map seek to increase the boundary of the SIL to the north-west to include the Bermondsey Dive Under area (see **Figure 1**) which includes one of our client's most significant land holdings (i.e. the land to the south of Silwood Street) in the borough (as set out in **Figure 2** and **Annex 1**). *LB Lewisham officer note: Figure 1: Existing vs. Proposed SIL Boundary is included in the original representation. The maps shows the Bermondsey Dive Under area circled in blue.* *LB Lewisham officer note: Figure 2: The Arch Company's land holdings to the south of Silwood Street is included in the original representation. The map shows an extract from an OS Map.* It is important to note that The Arch Company is fully aware of **(1)** the South Bermondsey Dive Under Masterplan (2019) prepared by Lyndon Goode Architects on behalf of Network Rail, LB Southwark and LB Lewisham which represents one of many possible redevelopment scenarios for the area as well as **(2)** the recently approved mixed use redevelopment of the *Land at Silwood Street* comprising four blocks with building heights of five to nine storeys providing flexible light industrial/office/retail/cafe/community floorspace (Use Classes B1a/B1c/A1/A3/D1) at ground/first floor levels and 61 residential units on the upper floors (LPA ref. DC/20/116783). This site sits directly adjacent to our client's land holding and shares a boundary with the main access road to a number of railway arches and the proposed SIL designation (with access to land component running past the frontage of the site). For the avoidance of doubt, our client wishes to clarify that it considers that its land holding at Bermondsey Dive Under, including the railway arches and all associated yard space, can continue to play an important role in providing employment-generating uses in this part of the borough. However, it is not considered that a simple extension of the SIL boundary is *justified* in this instance (or in accordance with Paragraph 35 of the NPPF) and will therefore not secure the optimum future use of the area.	Disagree. To be compliant with the London Plan, co-location at Evelyn Court, Trundleys Road and the Apollo Business Centre requires that these sites are released from SIL and that compensatory SIL is designated elsewhere. The Bermondsey Dive Under Site has been identified as the only suitable compensatory SIL site in proximity to the Surrey Canal SIL. To recognise the constraints associated with this site, the site allocation has a dual designation, with the majority of the land designated as SIL but the Railway Arches part of the site designated as LSIS. It also limits the types of industrial uses suitable for the site and recognises that residential properties will be built at the adjacent Silwood Street site allocation.	Bermondsey Dive Under site allocation added to the Plan, with a dual designation of SIL and LSIS.

			In fact, neither the *Lewisham Local Economic Assessment (December 2018)* nor the subsequent *Lewisham Employment Land Study (March 2019)*, both prepared by CAG Consultants, (or the 2019 Masterplan referred to above) assessed the Bermondsey Dive Under area in relation to its suitability as a potential replacement SIL or considered alternative sites for this purpose. It is therefore neither clear nor justified on what basis this site has been selected to be designated as SIL with relevant changes to the Policies Map and/or as specified in Table 8.1 of the Draft Local Plan therefore considered unsound. The Council's intention to 'substitute' land released from the SIL for alternative uses by including other land within this designation (i.e. in order to ensure that area-wise there is no net loss) is acknowledged. However, it is not considered that the Bermondsey Dive Under area is a suitable SIL replacement site.		
The Arch Company Properties LP (Turley obo)	2 2 -	EC 02 Table 8.1 Proposed Changes to the adopted Policies Map para 5.5	As such, the Council needs to be fully aware that any such designation means that it should make provision for the varied operational requirements of any of the above uses within the area including the railway arches adjacent to the approved mixed use residential development on Silwood Street (LPA ref. DC/20/116783) and its main access road running to the rear of the approved residential uses. At this stage, the evidence base published by the LPA is not considered to be sufficient and/or sound in order to justify the designation of the area as 'new' SIL (also see London Plan Policy E5(B)). It is also seen as problematic to grant planning permission for a residential-led development prior to designating the adjacent land as SIL, as proposals *"adjacent to SIL should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis"* (Policy E5(d)). Reiterating what has been set out above, our client considers that their land holding is well-suited to provide a continued (and lawful) range of employment uses (including 'softer' non-SIL uses within the outward facing railway arches which can co-exist with surrounding and emerging residential uses), however, from a planning policy perspective this site should continue to be treated as a Non-Designated Industrial Site or, if robustly justified, as LSIS, as its setting, constraints and surroundings are not deemed suitable to support and/or justify a SIL designation. This will be reflective of the current lawful uses on the site and adjacency to residential properties. It is therefore strongly recommended to amend the Draft Local Plan accordingly (i.e. Table 8.1 and the Proposed Changes to the adopted Policies Map) in order to ensure that it is robustly prepared, justified and sound in relation to this matter – and can therefore be fully supported by our client forming a strong framework for future development in the Bermondsey Dive Under area.	Comments are noted. Our response is set out above.	No change.
The Arch Company Properties LP (Turley obo)	- 2 2	General EC 02 Table 8.1	***Conclusion*** Overall, and as set out above, The Arch Company is supportive of the general direction of the Draft Local Plan and relevant emerging policies contained within it, but strongly disagrees with the addition of their land holding at Bermondsey Dive Under to the Surrey Canal Road SIL and considers that this designation is unjustified and will undermine future development opportunities within the area and/or negatively impact upon surrounding residential uses. Through the granting of planning permission ref. DC/20/116783, the LPA have confirmed that	Comments are noted. Our response is set out above.	No change.

			the character and context of Silwood Street has evolved to be that of a mix of uses and therefore a SIL designation is not deemed appropriate.		
L&Q Group	2	EC 02	*Relates to Call for site* 4.4 Employment use MELS are earmarked for comprehensive, mixed use development and the Council's aspiration is to include new modern workspaces in these schemes. L&Q welcomes LBL's recognition under Policy EC2 that it will need to take a broader view to planning for its future employment floorspace, given the wide range of users and their workspace needs.	Support noted.	No change.
(Avison Young obo)	2	EC 02	*Relates to Part 3, LCA SA 25* **Executive Summary** Draft Policy EC2 of the emerging Lewisham Local Plan seeks to protect employment sites and floorspace in line with the employment land hierarchy. Strategic Industrial Locations form the highest tier of the hierarchy, above Locally Significant Industrial Sites, Mixed-use Employment Locations and non-designated employment sites. The proposed policy seeks to identify three SIL sites where the co-location of employment and other compatible uses will be supported. Our client's site (the proposed development site) is not included in those sites identified. Our client's site is identified as an employment allocation within Chapter 14 of the draft Local Plan (Lewisham's Central Area). The site comprises Allocation 25: Randlesdown Road and Bromley Road, detailed on page 555 of the consultation material. The basis of the allocation is to deliver a comprehensive employment-led redevelopment with compatible commercial and ancillary main town centre uses, together with public realm enhancements, including to the Bellingham station approach. We have reviewed the available evidence underpinning the emerging Local Plan. These representations conclude the following: • Draft Policy EC2 has not been prepared in accordance with the tests of soundness set out in the National Planning Policy Framework (2019) (Paragraph 36). In our view the policy is not justified and is not based on proportionate evidence. Further, the Employment Land Review demonstrates that the preparation of the policy hasn't taken account of the reasonable alternatives nor does it make any viable conclusions on the clients site. This should be reviewed and the policy wording updated to reflect the recommendations of these representations i.e. that the policy should include be drafted to ensure that all SIL sites, or at least the clients part of the Bromley Road SIL, can accommodation the colocation of residential uses In addition to the above, we understand the site has been allocated (Allocation 25, page 555) for employment-led development. The principles of redevelopment for solely industrial and commercial uses has been tested at appeal and (APP/C5690/A/13/2192356 and APP/C5690/A/14/2223342). In both appeal cases, this was considered to be an unviable development option for the site. Supporting uses will be required to support the redevelopment of the site for industrial and commercial uses, and subsequently enhance the quality of the existing stock within the Bromley Road SIL. • We have demonstrated through these representations that the site presents a suitable, achievable and available development opportunities for the re-provision	Noted. The land referred in the response in located within London Plan designated Strategic Industrial Land (at Bromley Road SIL). The London Plan makes clear that SIL should be safeguarded. It sets parameters for the co-location of uses on SIL, and that this must be progressed through the plan-led process. Where SIL land is proposed to be rationalised to enable co-location, substitute industrial capacity for SIL must designated elsewhere in the Borough. Officers do not consider that there is land elsewhere in the Borough that could feasibly provide for replacement capacity, should this site be de-designated from SIL. It is noted that the representation does not put forth any suggested sites which could be considered for substitute SIL. Whilst the draft Local Plan makes proposals for new SIL to be designated at the Bermondsey Dive Under, this is required to provide substitute capacity for SIL land to be reconfigured at Trundleys Road, Apollo Business Centre and Evelyn Court.	Land at Randlesdown Road and Bromley Road site allocation has been removed from the Plan.

			of commercial uses, ensuring no loss and instead, an increase in employment opportunities, underpinned by the delivery of residential development. The co-location of these uses is supported by both the London Plan (2021) and NPPF (2019). • On the basis of our conclusions drawn in relation to Draft Policy EC2, we require the policy wording associated with the site's allocation (Allocation 25) to be updated to include references to the co-location of residential uses and the inclusion of a realistic indicative residential capacity. These representations provide further details on the matters raised above.	The Council acknowledges the aspirations for the site, and that a future development could potentially deliver net gains in industrial capacity along with residential uses. However, this would not be sufficient to satisfy the London Plan requirements. As the site allocation (which was proposed for solely non-residential uses) is considered to be undeliverable by the landowner, it will be removed from the Local Plan.	
(Avison Young obo)	2	EC 02	*Relates to Part 3, LCA SA 25* *Policy EC2: Protecting Employment Sites and Delivering New Workspace* We have assessed the evidence base underpinning Draft Policy EC2, namely the Employment Land Study (March 2019) and specifically the assessment criteria for identifying SIL for intensification and co-location of alternative uses such as residential, and the recommendations for employment site assessment summaries (Table 5.1). We are of the view that the assessment results, the recommendations and the requirements for industrial land are inconsistent. Para. 5.33 concludes that *"the size of the site allows for a masterplan approach to take place to allow intensification through a carefully planning* ***mixed use*** *development safeguarding this area for employment"*, whereas the recommendation for C9 – Bromley Road is that it is "*safeguarded for employment uses & intensify where possible*". The conclusions within the Council's Employment Land Review for safeguarding employment sites, including mixed-uses and co-locating uses through a masterplan process are therefore inconsistently applied within the Policy EC2.	Noted. The Employment Land Study is an evidence base document which has informed the Local Plan. Table 5.1 of the study summarises the report recommendations for industrial land management, which for Bromley Road SIL (Cluster C9 in the study) it states: "safeguard for employment uses".	No change.
(Avison Young obo)	2	EC 02	*Relates to Part 3, LCA SA 25* The Site Allocations background paper (January 2021) explains that site allocations were identified through 6 criteria; 1. The London-wide Strategic Housing Land Availability Assessment (SHLAA) 2. Lewisham 'Call for Sites' 3. Existing site allocations 4. Development pipeline 5. Evidence base (including the Employment Land Study (2019) 6. Officer review The Council appear to have nominated the site following an officer review and have disregarded three representations for mixed-use development on the basis that the site is 'safeguarded employment land'. As noted, the Employment Land	The land is identified as Strategic Industrial Land and is therefore inappropriate for mixed-use development in accordance with London Plan policies.	Land at Randlesdown Road and Bromley Road site allocation has been removed from the Plan.

			Review itself is inconsistent in its conclusions for the site, and it does not reflect the viability of an employment only intensification – as previous established through earlier appeals. Ultimately, this represents an inconsistent approach to identifying sites for co-location as applied by Lewisham and as a result draft Policy EC2 is not appropriately justified and based on proportionate evidence. The proposed policy does not consider reasonable alternatives, as required by Paragraph 35 (b) of the NPPF. In addition, by requiring there to be no net loss of floorspace and operational yard space, and the references to a 65% plot ratio, the principle of EC2 is inconsistent with the wording of London Plan Policy E7 which suggests that selected part of SIL could be intensified to provide additional industrial capacity, and that this would facilitate the consolidation of SIL to support the delivery of residential and other uses. On this basis, we are of the view that the proposed policy EC2 is not consistent with national policy with regard to enabling the delivery of sustainable development and is therefore unsound. The preparation of this policy should therefore be reviewed in line with the tests for soundness set out at Paragraph 35 of the NPPF. This should be reflected in the next iteration of the Local Plan, to which we reserve the right to make further comment.		
(Avison Young obo)	2	EC 02	*Relates to Part 3, LCA SA 25* **Summary** We have reviewed the Borough of Lewisham's Regulation 18 consultation material, including the Main Issues and Preferred Approach document. We have concluded that there are inconsistencies within the conclusions of the Employment Land Study. On this basis, we are of the opinion that the Policy EC2 is not justified, insomuch that it is not based on proportionate evidence and does not take into account the reasonable alternatives, in line with the tests sets out in the NPPF at Paragraph 35 for preparing new Local Plans. In addition it is not consistent with national and strategic planning policy and does not enable the delivery of sustainable development in accordance with the policies in the Framework. On this basis we are of the view that the Plan and specifically draft Policy EC2 cannot in its present form be found sound. In addition, we would recommend that the draft wording is amended to specify alternative uses, including those relating to the provision of residential development, in line with Policy E7 of the London Plan which identifies such residential uses as being appropriate uses within a intensified and consolidated SIL. As presently worded, the Site Allocation and Policy EC2 are inconsistent with strategic policy. We have recommend that the policy wording be updated to provide flexibility to support the colocation of compatible uses within this part of the Bromley Road SIL, including where the proposals would not result in an increase in employment opportunities; where the proposals would provide betterment to the overall public realm; and assist in regenerating a site which contributes poorly to the	Noted. The Employment Land Study is an evidence base document which has informed the Local Plan. Table 5.1 of the study summarises the report recommendations for industrial land management, which for Bromley Road SIL (Cluster C9 in the study) it states: "safeguard for employment uses". The land is identified as Strategic Industrial Land and is therefore inappropriate for mixed-use development in accordance with London Plan policies.	No change.

			local area. We are not seeking the co-location of residential uses on parts of the SIL that are outside of our client's ownership.		
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	2	EC 02	*Relates to Call for site* **Policy EC2: Protecting Employment Sites and Delivering New Workspace** Draft Policy EC2 sets out the Council's strategic policy on employment land. It identifies a need for 21,800 sqm of net additional employment floorspace (Class B1) up to 2038, which will be focused in Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), through retaining industrial capacity by ensuring no net loss of floorspace and operational yard space. We note that the Council should ensure all references to land uses are consistent with the changes to the Use Class Order that came into effect on 1 September 2020. This is necessary to ensure its land use policies can be easily interpreted. This is relevant to the Plan as a whole.	Noted. The Local Plan will be amended to reflect and respond to these changes.	Local Plan Part 2 Economy and Culture section amended throughout to reflect and in response to changes to the Use Classes Order, including the new Class E.
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	2 2 3 5	EC 02 Table 8.1 Figure 15.2	*Relates to Call for site* Table 8.1 accompanies Policy EC2 and sets out Lewisham's Employment Land Hierarchy. It identifies Evelyn Street as LSIS (which replaces its current LEL designation). We support the change in terminology for consistency with the London Plan. However, we note that Figure 15.2 of the Draft Plan is inconsistent with Table 8.1 and Schedule 4 as it wrongly identifies the Site as SIL. This should be addressed by the Council at Regulation 19 stage to ensure the Site is not inadvertently designated as SIL.	Support noted. Mapping error noted and Figure 15.2 will be amended for accuracy.	Local Plan amended so that Figure 15.2 designates the site as LSIS (and not SIL).
Notting Hill Genesis (Savills obo)	2 2 2	EC 02 Table 8.1 Figure 8.1	*Relates to Call for site* *Commercial and Mixed Use Redevelopment* It is acknowledged that under the adopted Local Plan, the site is currently designated as a Local Employment Location (LEL) which seeks to protect B Use Class Employment Uses. Table 8.1 (Lewisham's Employment Land Hierarchy) and corresponding Figure 8.1 of the draft Local Plan proposes to designate Malham Road Industrial Estate as a Locally Significant Industrial Site (LSIS), which is protected for commercial and industrial uses, with priority given to B1 commercial and light industrial uses. As part of the reform to the Town and Country Planning (Use Classes) (England) Regulations (as amended) ("the Use Classes Order"), from 1 September 2020, the former Use Class B1 now falls into the new Use Class E (Commercial Business and Service) which covers a broad range of uses, including: retail, restaurant, office, financial/professional services, indoor sports, medical, gym and nursery uses along with any other services which it is appropriate to provide in commercial, business or service locality. As such, subject to no previous restrictions such as planning conditions, any former B1 units located at Malham Road Industrial Estate could change between any of the uses described within the Use Class E i.e. the change no longer constitutes development and as such, no longer requires planning permission. The draft Local Plan must take into account this new legislation, and the government's intent to adopt more flexible commercial uses.	Noted. The Local Plan will be amended to reflect and respond to these changes in planning legislation.	Local Plan Part 2 Economy and Culture section amended throughout to reflect and in response to changes to the Use Classes Order, including the new Class E.
Notting Hill Genesis (Savills obo)	2	EC 02	*Relates to Call for site* We also note that draft Local Plan Policy EC2 (Protecting employment sites and delivering new workspace) sets out that the Council will ensure that there is no net loss of floorspace or operational yard space within LSIS. Whilst this approach was previously reflected in the Intend to Publish London Plan, this was rejected by the Secretary of State (SoS). In the SoS's letter to the Mayor of London (dated	Noted. The London Plan provides that Local Plans can include provisions to retain SIL, LSIS and other industrial sites / capacity, taking into account local	Local Plan amended to provide new definition of industrial capacity and removal of 65% plot ratio.

			13 March 2020), the SoS stated this approach was not realistic and **was inconsistent** with the National Planning Policy Framework, which requires that sufficient land of the right type is available in the right places and at the right time to support growth and innovation and was an over-restrictive stance to hinder Boroughs' abilities to choose more optimal uses for industrial sites where housing is in high demand. We therefore consider that the Council's current approach to 'no net loss' on existing industrial land set out in Policy EC5 and EC2 is **not consistent** with national policy and **not consistent** with the London Plan. It could also have the effect of unnecessarily constraining development and would therefore **not be effective** in its delivery. As such, we request that any policy references relating to "no net loss of industrial capacity" are deleted. This would ensure that the draft Local Plan is **consistent** with the London Plan and national policy.	evidence. The Employment Land Study makes clear that Lewisham has experienced a significant loss of capacity and recommends that remaining capacity be retained in order to help meet identified needs over the plan period. The no net loss principle is therefore considered to be justified and in conformity with the London Plan. However it is acknowledged that the draft Local Plan definition of industrial capacity should be amended for conformity with the London Plan.	
Barratt London and the Church Commissioners (Avison Young obo)	2	EC 02	*Relates to Part 3, LCA SA 20* **Chapter 8 Economy and Culture** **Draft Policy EC2 Protecting employment sites and delivering new workspace and Draft Policy EC7 Non-designated employment sites** We request clarification within the wording of Draft Policy EC2 and EC7 that non-designated employment sites are limited to smaller commercial and industrial sites, i.e. those in Class E(g) (formally B1), B2, and B8 uses, and would not include major redevelopment sites within town centres and/or sites in retail use.	Noted. Disagree with the suggested change. The draft Local Plan broadly seeks to protect industrial capacity, including on non-designated employment sites, irrespective of its location. The approach is informed by the evidence base, including the Employment Land Study and monitoring. In light of the comment, the plan will be amended to provide more clarity as to what constitutes a non-designated site.	Local Plan amended to make clear the definition of non-designated employment land.
SEGRO (CBRE Limited obo)	2	EC 02	*Relates to Part 3, LNA SA 04* Executive Summary It is important that the draft plan recognises and plans for the continued growth of the industrial and logistics sector, and the structural shift in society to e-commerce which has only been accelerated by the Covid-19 pandemic. SEGRO therefore welcomes the continued identification of Deptford Trading Estate as a designated Strategic Industrial Location (hereafter "SIL"), and the direction of travel within the plan which seeks to protect and intensify employment uses in these locations.	Support noted.	No change.
SEGRO (CBRE Limited obo)	2	EC 02	*Relates to Part 3, LNA SA 04*	Comments are noted. The Plan seeks to provide a balance between providing	No change.

			•Draft policies should allow new industrial capacity to come forward within and beyond designated employment sites to ensure the plan is sufficiently flexible to react to changes in industrial demand throughout the plan period. •Mixed use site allocations near to SILs should explicitly reference the SIL as a constraint to future development to ensure the future of this essential employment land supply is not jeopardised. As a minimum, the allocations should reference that no residential development will be approved that will prevent the ability for the SIL to operate on a 24/7 basis. •The assessment of the Blackhorse Road SIL (which includes Deptford Trading Estate) as a site which "cannot be expanded" in the evidence base is not qualified. Although SEGRO are not actively promoting intensification at this time, we suspect this will be feasible subject to detailed matters including highways and design.	sufficient employment land to meet needs whilst protecting local amenity by directing storage and warehouse uses to designated employment sites. The Local Plan also allows co-location in a select number of locations, as part of a strategy to intensify employment uses on these sites, in line with the London Plan. Relevant site allocations also note that development must not compromise the function of SIL and LSIS and/or reference the ability to function on a 24 hour basis.	
SEGRO (CBRE Limited obo)	2	EC 02	*Relates to Part 3, LNA SA 04* Response to the Consultation: On behalf of SEGRO, CBRE Limited has reviewed the content and evidence base to the LB Lewisham Local Plan. Our key observations and comments are summarised below. 1. Plot Ratios Whilst we welcome LB Lewisham's objective to protect existing industrial capacity across the borough, we do not support the requirement for new industrial development to achieve a 65% plot ratio. This policy has been removed from the London Plan (2021) following a direction from the Secretary of State because it was not considered to be an effective tool for managing industrial capacity. SEGRO provided extensive evidence to the London Plan examination on this point, demonstrating that a 65% plot ratio does not provide adequate yard space for many of its customers, who on average operate their businesses most efficiently at plot ratio of 40-50%. *LB Lewisham officer note: Appendix 1: Plot Ratios Evidence is included in the original representation.* To ensure general conformity with the London Plan, all references to the 65% plot ratio should be removed from the draft plan.	Noted.	Local Plan amended to provide new definition of industrial capacity and removal of 65% plot ratio.
SEGRO (CBRE Limited obo)	2	EC 02	*Relates to Part 3, LNA SA 04* 3. Industrial Land Supply The Lewisham Employment Land Study (2019) acknowledges that there has been a net loss of industrial land capacity in recent years, and further loss is expected as a result of development proposals in the pipeline - the cumulative loss of industrial supply expected across the plan period (between 2018 and 2018) is 12.4ha. This is very concerning for SEGRO when coupled with very low vacancy	Noted. The Local Plan seeks to provide a balance between protecting employment land to support the function of the wider London economy, whilst also seeking to meet identified needs for employment floorspace,	Local Plan Part 2 Economy and Culture policies amended to set out stronger support for storage and warehousing uses within SIL to support London's economy, along with providing more flexibility

			rates of 3% across the borough, which is widely accepted to reflect an inefficient and unhealthy real estate market. The plan's strategy for industrial land management is to protect some existing designated industrial sites, release others for 'co-location' (mixed use development) and prevent additional supply of logistics outside of employment sites. Whilst we acknowledge that co-location can maintain existing levels of industrial capacity if appropriately designed, it does constrain the ability of established industrial locations to intensify their activities to respond to increases in demand, which will result from an increased population and greater pressure on the 'last mile' of the supply chain. This, together with a policy that prevents new logistics opportunities coming forward outside of designated industrial sites, will prevent the creation of additional supply now and in the future. We believe this is needed to reserve the impact of recent losses and allow vacancy rates to increase to a healthier level. On this basis, we question whether the proposed strategy of only protecting some industrial land and allowing the rest to be developed for a mix of commercial and residential uses is justified and achieves the objectives of the NPPF to deliver 'sustainable development'. We recommend two solutions for the plan to better address current and furture industrial need: 1. Part B(d) of Policy EC2, which states that proposals consist solely or predominantly of storage and warehousing uses outside of SIL should be resisted the redevelopment, should be removed; and 2. Proposals for new sensitive uses, such as residential, near to SILs should be very carefully managed and designed to ensure that existing uses in SILs and their ability to intensify and operate on a 24/7 basis are not compromised – see next section of these representations for further discussion.	which in Lewisham are primarily for Class E(g) business uses, as set out in the Employment Land Study. Accordingly, the draft Local Plan sets out a strong position to safeguard existing industrial capacity, whilst also enabling the co-location of employment and other uses in a select number of locations, as part of a strategy to intensify employment uses on these sites, in line with the London Plan. However, it is recognised that the plan could better address the need to support London's wider economy including the CAZ, such as for logistics and last-mile delivery. The plan will therefore be amended to provide more flexibility for storage and warehousing, whilst continuing to seek to carefully manage these uses, recognising they are not the principal identified local needs as far as employment provision is concerned.	for these uses in LSIS and non-designated employment areas. Local Plan amended with additional requirements on amenity, specifically in relation to protecting the function and effectiveness of SIL and LSIS, and SIL on a 24-hour basis. This will work together with Amenity and Agent of Change policy.
Cockpit Arts (The Planning Lab obo)	2	EC 02	*Relates to Part 3, LNA SA 14* • CA is supportive of policies that seek to protect important employment locations, including those designated as MELs. • We query how LB Lewisham plans to ensure the mixed-use development permitted in MELs achieves an appropriate balance between employment and other uses? Will this be achieved via specific quotas, and how will this be monitored/enforced? It will be important that this balance includes retention/provision of specific maker space (i.e. dirty/messy/noisy light industrial creative space) which has different requirements from digitally-driven creative businesses, or other artist workspace. • CA is supportive of other policies in the Plan that require MELs to be progressed according to masterplans to ensure the responsibility of providing employment floorspace is approached pragmatically between owners/developers within the MEL.	Support noted. The draft Local Plan does not prioritise residential uses above other land uses in MELs. The Local Plan also requires a balanced approach through the use of masterplans to demonstrate an appropriate mix of uses on sites. Draft Policy EC6.C sets out new approaches to protecting new employment capacity	No change.

			• We would advocate that demands for other competing priority uses (e.g. residential) are not prioritised in these areas, over employment floorspace.	delivered on MELs through the masterplan process. The Council will monitor the implementation and effectiveness of policies through the Authority Monitoring Report process.	
Artworks Creekside (Avison Young obo)	2	EC 02	*Relates to Part 3, LNA SA 16* ***Draft Policy EC2 – Protecting employment sites and delivering new workspace*** Draft Policy EC2 seeks to safeguard land for commercial and industrial uses through retaining employment capacity within Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). We note that Lower Creekside is identified as a LSIS which are identified in Table 8.1 as providing for the borough's *'main local concentrations of commercial and industrial uses, which perform a niche role to support the functioning of the sub-regional and local economy. They provide workspace for micro, small and medium sized businesses, including the cultural, creative and digital industries. Protected for commercial and industrial uses, with priority given to Class B1 commercial and light industrial uses.'* Whilst forecast need has been identified for 21,800 sqm of net additional employment floorspace, it is noted that this refers to previous Use Class B1. This has since been replaced by Use Class E(g) (Use Classes Order 1987 as amended in September 2020) and draft Policy EC2 and the supporting text should be updated to reflect the latest use classes.	Noted. The Local Plan will be amended to reflect and respond to these changes in planning legislation.	Local Plan Part 2 Economy and Culture section amended throughout to reflect and in response to changes to the Use Classes Order, including the new Class E.
Artworks Creekside (Avison Young obo)	2	EC 02	Part B(a) of draft Policy EC2 states that within SIL and LSIS locations industrial capacity should be retained *'ensuring no net loss of floorspace and operational yard space along with intensifying employment development, including by facilitating the co-location of employment and other compatible uses through the plan-led process'.* The supporting explanatory text advises that safeguarding of employment land includes *'floorspace, yard space for operations and servicing space'.* The principle of intensifying employment sites and the ability to co-locate employment uses alongside other uses is supported and London Plan Policy E7 supports efficient use of employment land through delivering higher plot ratios, whilst having regard to operational requirements (including servicing). London Plan Policy E7 is clear insofar as it required intensification to provide additional capacity. However, the principle of 'no net loss' and the 65% plot ratio was omitted from the adopted London Plan and there is no requirement for LSIS locations to consider the loss of floorspace and operational yardspace. If applied to 2 Creekside, the requirement to protect all operational yard space would be overly restrictive and would not allow successful intensification of designated employment sites and the opportunities for co-location that the wider employment Policies seek to achieve.	Noted. The London Plan provides that Local Plans can include provisions to retain SIL, LSIS and other industrial sites / capacity, taking into account local evidence. The Employment Land Study makes clear that Lewisham has experienced a significant loss of capacity and recommends that remaining capacity be retained in order to help meet identified needs over the plan period. The no net loss principle is therefore considered to be justified and in conformity with the London Plan. However it is acknowledged that the draft Local Plan definition of industrial capacity should be amended for	Local Plan amended to provide new definition of industrial capacity and removal of 65% plot ratio.

				conformity with the London Plan.	
Big Yellow Storage Company Limited (DWD obo)	2	EC 02	**Policy EC2 (Protecting employment sites and delivering new workspace)** Big Yellow **supports** part A of this policy, which seeks to safeguard employment sites and floorspace for commercial and industrial uses. However, Big Yellow **strongly objects** to part Ad of this draft policy, which states: *"Outside of SIL, resisting the redevelopment of employment land and sites where proposals consist solely or predominantly of storage and warehousing uses."* Part D would therefore apply to the redevelopment of sites located anywhere other than in Strategic Industrial Locations (SILs), including LSISs and non-designated employment sites. No explanation is provided for this approach. More importantly, Part Ad would apply to the redevelopment of existing storage and warehousing uses located in LSISs or on non-designated employment sites. Storage and warehouse uses are universally accepted as key industrial land uses that make a significant contribution to the function of both Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs) across London boroughs. Part Ad would prevent existing self-storage facilities from being redeveloped and intensified, if they are located within LSISs or on non-designated employment sites, unless the redevelopment proposal involves a greater proportion of other employment uses. This is an unreasonably onerous approach and likely to result in the loss of industrial floorspace when there could be opportunities to secure intensification of these sites for both self-storage (an industrial use) and other employment uses. The Site is located within an LEL and the existing self-storage facility performs well. If Big Yellow sought to redevelop and intensify the Site, Part Ad places a restriction that would likely mean redevelopment would be unviable. Therefore, we **request** that greater flexibility is provided in the wording of Part Ad and suggest that it is amended to read as follows: *"Outside of SIL, resisting the redevelopment of employment land and sites where proposals consist* *solely or predominantly of storage and warehousing uses,* ***unless:*** ***• Sites are presently in sole or predominantly of storage and warehousing use; and*** ***• Redevelopment proposals comprise intensification of storage and warehousing floorspace; and*** ***• The introduction of other employment uses."*** These amendments provide flexibility for existing self-storage facilities to redevelop their sites to re-provide self-storage floorspace, providing the floor area is intensified and other employment uses are integrated.	Noted.	Local Plan amended to provide greater flexibility for development proposals in existing storage and distribution use, as recommended.
The Renewal Group (Carney Sweeney obo)	2	EC 02	*Relates to Part 3, LNA SA 08* **Policy EC2 Protecting Employment Sites and Delivering New Workspace** This policy should be updated to reflect the amendments to the London Plan prior to its final adoption and publication. The policy also needs to be updated to take into account new Use Class E and the imminent amended permitted	Noted.	Local Plan reviewed throughout to reflect changes to and ensure conformity with the London Plan (2021).

			development rights later this year. The Inspector considering the Westminster Local Plan in 2020 made clear the importance of this.		
(Avison Young obo)	2 -	Chapter 8 EC 02	Chapter 8 identifies the main issues relating to the Lewisham's economy and culture, including: making the best uses of land and striking the right balance between the delivery of homes and space for business; the role of out-of-centre retail parks; inclusive economy; affordable workspace; design quality; and responding to the challenge facing the high street. Draft Policy EC2 provides support for the protection of commercial and industrial uses within the Borough. Point A notes that proposals for new development should be commensurate with the type and function of land sites within the hierarchy detailed in Table 8.1 (and replicated below). Point B confirms the level of net additional employment floorspace with Class B1 required within the Plan period (21,800 sqm) and how this will be met. Point Ba. confirms the approach to delivery will be focused on ensuring no net loss of floorspace and operational floor space within Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSIS). This is plainly now out of date as a result of the direction from the Secretary of State and the removal of the 'no net loss' principle and the reference to plot ratios from the adopted London Plan (2021). Furthermore, the intensification of these sites including the co-location of other employment and compatible uses will only be supported on identified sites (as per those listed in Point D). Point C of the draft policy wording confirms that development proposals on sites within SILs must not adversely impact on the function and integrity of the SIL or prejudice the continued operations of existing uses. Point D confirms three sites where the co-location of other compatible uses will be supported, including: Apollo Business Centre (Surrey Canal Road SIL); Trundleys Road (Surrey Canal Road SIL); and Evelyn Court (Surrey Canal Road SIL). Our clients site is not included within the policy wording for the co-location of compatible uses. *LB Lewisham officer note: Figure 2: Lewisham's Employment Hierarchy is included in the original representation. It provides details relating to SIL, LSIS, MEL, and Non-designated employment sites.*	Disagree that the plan is out of date. Co-location can only take place where SIL is released and compensatory provision of SIL is designated elsewhere. Bromley Road SIL is not included in point D as it has no compensatory SIL sites.	No change.
	2	EC 02	*Relates to Part 2, LNA SA 06* Site context and background The site is located at 164-196 Trundleys Road and 1-9 Sanford Street, Deptford SE8 5JE. The site lies southwest of Deptford Park, adjacent to Folkestone Gardens and extends to approximately 0.38 ha. The site is bound by Trundley's Road to the east, Sanford Street to the south, railway lines and a TfL operations building (substation) to the west and Juno Way to the north. The site benefits from a long frontage to Folkestone Gardens.	Noted. An additional row in Table 8.1 is not necessary. Table 8.1 has been amended to show that Trundleys Road is designated as LSIS. Schedule 4 also recognises that Trundleys Road has been de-designated from	The Local Plan now reflects the approved planning application for Trundleys Road

			A planning application was submitted for the Site for an employment-led scheme with residential above for 189 units in May 2018 and is pending determination by LBL (ref DC/18/106941). A second application was also submitted in August 2020 for an employment-led scheme with residential and student accommodation above and is also pending determination by LBL (ref 20/117886). Uses will only be supported at selected SIL sites, and where it can be suitably demonstrated that the requirements of draft London Plan policies E5 and E7 and other Local Plan policies, are satisfied. This includes the Trundley's Road site currently within Surrey Canal SIL, which is proposed to be de-designated from SIL (as discussed further below). On the basis that the Trundley's Road site is to be de-designated from SIL, Policy EC2 should clarify that the Trundley's Road site no longer forms part of the Surrey Canal Road SIL. For clarify, an additional row could be included in Table 8.1 specifically for such co-location sites.	SIL and re-designated as LSIS. The Surrey Canal Road and Trundleys Road site allocation also mentions that it is a re-designated LSIS site.	
Tetra Tech Planning (John Lyon's Charity obo)	2 2 2	EC 02 EC 03 Table 8.1	**Economy & Culture** **Do you agree that the Local Plan has identified all of the issues around economy and culture?** We consider that Policies EC2, Table 8.1 and EC3 should include a reference to Site Allocations within the Employment Land Hierarchy.	Noted. The Local Plan should be read as a whole.	No change.
Fifth State and (Avison Young obo)	2	EC 03	*Relates to Part 3, LNA SA 16* ***Draft Policy EC3 – Location and design of new workspace*** The Owners and Developer of 5-9 Creekside strongly support draft Policy EC3 which outlines a number of criteria to promote the delivery of high quality, flexible and suitable workspaces for micro, small and medium-sized businesses.	Support noted.	No change.
L&Q Group	2	EC 03	*Relates to Call for site* Policy EC3 (C), includes several provisions that new employment development should consider. L&Q disagree that commercial fit out to shell and core only is not appropriate. Rather, we consider providing units to shell and core enables us to attract the greatest number of potential occupiers and provide flexibility in the type of workspace that can be delivered on site, especially given the new wider E use class. Moreover, full internal fit out will add considerably to build costs and we consider this should not be prioritised over other benefits, such as affordable housing. We work closely with local agents through the design process to establish the type of users that would be attracted to the location and consider this as part of our overall strategy for the site, including implications for local amenity, servicing requirements and interplay with the public realm. L&Q note the LBL's preference for employment locations to include a range of premises available, in terms of both type and size but also an appropriate range of rents.	Noted. It is accepted that the policy could be amended to require that development proposals provide an appropriate level of fit out (rather than full fit out) and will be considered on a case-by-case basis. However retaining position that shell and core only is unacceptable in principle.	Policy amended to require that development proposals provide an appropriate level of fit out, to be assessed on a case-by-case basis.
GHL (Leegate) Limited (Frank Knight obo)	2	EC 03	*Relates to Part 3, LEA SA 03* 3. Economy and Culture The Council has set out to ensure that the Local Plan continues to support the success and future growth ambitions of Lewisham. Policy EC3 (Location and design of new workspace) states new employment development will be directed to sites in Lewisham's employment land hierarchy.	Noted.	No change.
Artworks Creekside	2	EC 03	*Relates to Part 3, LNA SA 16* ***Draft Policy EC3 – Location and design of new workspace***	Support noted.	No change.

(Avison Young obo)			As demonstrated to the Council through our emerging development proposals, we are seeking to create high quality, flexible and suitable workspaces for micro, small and medium-sized businesses. We therefore support Policy EC3.		
QUOD (Landsec obo - Lewisham Shopping Centre)	2 2 2	EC 03 EC 04 EC 09	**Workspace** 11.4 Landsec generally support draft workspace policies EC3 'Location and design of new workspace' and EC4 'Providing suitable business space and affordable workspace', albeit would like to work with the Council to better understand the justification for the provision of 10% of proposed employment floorspace comprising affordable workspace (EC4E). 11.5 The narrative to this policy requires further justification for the 10% requirement. The Lewisham's Employment Land Study (2019) and Local Economic Assessment (2019) does not justify the policy. This approach conflicts with London Plan Policy E3 'Affordable workspace' which requires that *"Boroughs, in their Development Plans, … consider detailed affordable workspace policies in light of local evidence of need and viability."* Policy EC4 E should be viability tested. 11.6 Policy EC9 C 'Workplace training and job opportunities' requires new development that results in a net loss of employment floorspace to make contributions towards local employment and training initiatives. Town centre regeneration resulting in mixed use development will result in changes in different types of floorspace and the new E class is designed to facilitate that. Rather than having a formulaic approach, the Council could agree bespoke agreements with strategic development in order to ensure that development can maximise the benefits for local people though future employment opportunities.	Disagree. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified.	Local Plan amended to provide further information on how affordable workspace requirements will be implemented.
Fifth State and (Avison Young obo)	2	EC 04	*Relates to Part 3, LNA SA 16* ***Draft Policy EC4 – Providing suitable business space and affordable workspace*** The Owners and Developer of 5-9 Creekside broadly support the principle of the proposed draft Policy wording which seeks major developments to provide at least 10% of new employment floorspace as affordable workspace. Part E of the draft Policy states that further details will be set out in the Council's Planning Obligations SPD. The supporting text states that *'affordable workspace is workspace that is provided at rents maintained below the market rate. This type of workspace is important to support business start-ups, particularly in the cultural and creative sectors'.* As currently drafted there is no confirmation of the specific heads of terms or discount levels which are envisaged to be imposed through the Planning Obligations SPD to secure the provision of affordable workspace. As such a detailed response on the viability of such a requirement cannot be provided, but the principle of such a mechanism is supported. Fifth State request that the proposed affordable workspace discount is specified within this policy so that it can be appropriately viability tested at the plan making stage, as required by the NPPF.	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified.	Local Plan amended to provide further information on how affordable workspace requirements will be implemented.

			Fifth State reserve the right to make further comment in relation to the specific heads of terms at the appropriate time.		
The Arch Company Properties LP (Turley obo)	2	EC 04	***Draft Policy EC4 Providing suitable business space and affordable workspace*** Whilst our client is generally supportive of the Council's objective to secure (suitable and) affordable workspace, it is important to: a) Highlight that the provision of such floorspace will have to be subject to viability testing (especially in designated industrial land within which redevelopment projects already have to deal with significant pressures on viability, particularly in co-location schemes, and therefore affordable workspace may result in a conflict with the provision of affordable housing or other infrastructure). To this extent, it is acknowledged that para. 8.23 of the Draft Local Plan refers to a viability tested route, however, to be clear and transparent this should be recognised in the main policy wording in order for the provision of affordable workspace (on/off-site) to be justified; and b) In relation to railway arches (Part D(d)), the same comments as set out in relation to Draft Policy EC8 above apply where it relates to railway arches.	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified. The draft Local Plan EC04 supporting text provides that flexibility may be applied where the requirement cannot be met for reasons of viability. This point will be elevated to the policy for clarification.	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace.
L&Q Group	2	EC 04	*Relates to Call for site* Notably, Policy EC4 D states that within MEL's, where there is existing provision of affordable workspace on-site, proposals will be required to retain or re-provide this workspace in any future redevelopment unless it can be demonstrated that the affordable workspace has been provided on a temporary basis (meanwhile use). Whilst L&Q agree that proposals should include premises with an appropriate range of rents, it may not be possible or appropriate in all cases to match the affordable workspace, especially if as part of the comprehensive redevelopment of the site, the premises re-provided are of a substantially better quality. This should be acknowledged by LBL in the supporting text. In addition, L&Q are of the view that subsidised workspaces should be balanced against other requirements for the site, some of which may also be subsided i.e. quantum of affordable housing. This needs to be considered as part of the feasibility exercise reference at EC 4(e), which should be expanded to include the viability of subsided workspace as well as feasibility.	The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified. The draft Local Plan EC04 supporting text provides that flexibility may be applied where the requirement cannot be met for reasons of viability. This point will be elevated to the policy for clarification.	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace.
L&Q Group	2	EC 04	*Relates to Call for site* However, L&Q's concerns regarding the appropriateness of new and re-provided affordable workspace, both in terms of the finish of units and rent levels, raised above on Policy EC4, apply to this policy.	Noted. Reponses to further detailed representations set out elsewhere in the Consultation Statement.	No change.
Notting Hill Genesis (Savills obo)	2	EC 04	*Relates to Call for site* Notwithstanding the above, NHG supports the overall principles of draft Local Plan Policy EC4 (Providing suitable business space and affordable workspace) as it relates to the delivery of new and re-purposed workspace designed to accommodate micro, small and medium sized businesses to complement and support existing clusters of cultural and creative businesses. NHG also support, in principle, the provision of affordable employment floorspace, subject to viability.	Support noted.	No change.

GHL (Leegate) Limited (Frank Knight obo)	2	EC 04	*Relates to Part 3, LEA SA 03* Furthermore, Policy EC4 (Providing suitable business space and affordable workspace) adds that new major commercial development, including major mixed-use development, will be required to provide at least 10% of new employment floorspace as affordable workspace (on site where feasible). GHL broadly supports the economic development policies set out in Chapter 8 (Economy and Culture) but reminds the Council to ensure the policies are justified and that Policy EC4 has been informed by appropriate evidence which determines why affordable workspace is required on all major mixed-use developments. It is suggested that this policy is informed by relevant evidence base and is tested through a viability route. Policy EC4 will need to be further scrutinised to ensure that any additional costs being placed on development, does not impact upon scheme feasibility and viability.	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified.	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	2	EC 04	*Relates to Part 3, LNA SA 14* **Suitable business space and affordable workspace** We note the approach of Policy EC4 (Providing suitable business space and affordable workspace) is that major development proposals commercial development proposals should ensure provision is made for suitable types and sizes of units, at an appropriate range of rents, with part E stating that new major commercial development, including major mixed-use development incorporating commercial floorspace will be required to provide at least 10% new employment floorspace as affordable workspace where feasible. Whilst the principle of providing commercial floor space is supported, any provision of affordable workspace must be considered on a case by case basis, having regards to the overall benefits that a major mixed use scheme would deliver to ensure it does not jeopardise the overall effective delivery of a comprehensive mixed use redevelopment site allocation. As such, the drafting should be amended to ensure the provision is considered on a case by case basis, and/or subject to viability. Currently the text makes reference to “where feasible” but this should be updated to “where viable”. Making this change would provide flexibility and it will ensure that the draft Local is **effective** in its delivery.	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified.	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace
SEGRO (CBRE Limited obo)	2	EC 04	*Relates to Part 3, LNA SA 04* • The draft affordable workspace policy needs to be justified by evidence that it is both necessary and viable, and needs to be clearly drafted to provide certainty to developers regarding exactly under what circumstances affordable workspace should be provided; how much should be provided; and on what terms.	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified.	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace
SEGRO (CBRE Limited obo)	2	EC 04	*Relates to Part 3, LNA SA 04* 6. Affordable Workspace We note that the London Plan 2021 (Policies E2 and E3 specifically) provides a policy framework for local affordable workspace policies to come forward where there is an identified need. The examination of the London Plan policy indicated a number of considerations that would be important to testing whether such a	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence,	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace.

			policy would be sound, including ensuring the policy is sufficiently clear in its requirements and ensuring these requirements are justified by the appropriate evidence. In this context we have the following observations and recommendations for draft policy EC4 (Providing suitable business space and affordable workspace): • As a general point, we recommend that an evidence-based assessment of need is undertaken to establish where the market is failing to deliver a certain type of workspace and why such workspace is necessary to be supported in planning terms. This will help the policy to be justified and effective in achieving its objectively assessed needs. •Part A talks about provision being made for 'suitable types and sizes of units, at an appropriate range of rents' – the definition of 'suitable' and appropriate is not included and so it is not clear what is expected and how a development would be assessed against this policy. We recommend that the Council refers to the inspectors' comments on Policy E2 of the Draft London Plan which was submitted for examination for a discussion on the soundness of this language and approach. •Part C requires development to retain or re-provide existing provision of low-cost or affordable workspace on-site – as above, we recommend that the Council refers to the inspectors' comments on Policy E2 of the Draft London Plan. •Part E requires new major commercial development, including major mixed-use development incorporating commercial floorspace, to provide at least 10% of new employment floorspace as affordable workspace. This should be provided on site wherever feasible. Further details will be set out in the Council's Planning Obligations Supplementary Planning Document. The NPPF requires viability testing to be undertaken at the plan making stage, so we believe it is necessary for the local plan policy to at least set out the expected level of discount below market rent to be specified. •In relation to Part E, we also recommend that this policy is only applied to net additional business floorspace to ensure that investment into existing buildings or replacing them with more sustainable ones is not dis-incentivised.	the requirement is considered to be viable and justified. The council is also preparing an affordable workspace strategy.	
Cockpit Arts (The Planning Lab obo)	2	EC 04	*Relates to Part 3, LNA SA 14* • CA endorses policy that requires provision of genuinely affordable workspaces for all creative industries, including independent makers and crafts (not just 'arts'). Again, we reiterate that it is important that these workspaces include specific maker space (i.e. dirty/messy/noisy light industrial creative space) which has different requirements from digitally-driven creative businesses.	Support noted. The draft Local Plan provides flexibility for a wide range of uses to locate within employment locations, with detailed requirements around amenity to ensure industrial uses are not prejudiced.	No change.
Artworks Creekside (Avison Young obo)	2	EC 04	*Relates to Part 3, LNA SA 16* ***Draft Policy EC4 – Providing suitable business space and affordable workspace*** Artworks Creekside, having been involved in affordable workspaces on both sites for a number of years, broadly support the principle of the proposed draft Policy wording which seeks major developments to provide at least 10% of new employment floorspace as affordable workspace.	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence,	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace

			Part E of the draft Policy states that further details will be set out in the Council's Planning Obligations SPD. Clearly, Artworks Creekside reserve the right to make further comment in relation to the SPD at the appropriate time.	the requirement is considered to be viable and justified.	
Transport for London Commercial Development	2	EC 04	**EC4 Providing suitable business space and affordable workspace** TfL CD acknowledge the need to provide affordable workspace in the right locations. However, it is considered that criterion a is ambiguous and overlaps with criterion E. It is suggested that criterion A is reviewed to ensure it is not repeating other criteria and that it is clear what is expected of a developer.	Noted. Criterion A sets a general approach for development proposals to consider how provision for SMEs and micro businesses can be delivered. The remainder of the policy sets out details for specific types of workspace.	No change.
The Renewal Group (Carney Sweeney obo)	2	EC 04	*Relates to Part 3, LNA SA 08* **Policy EC4 Providing Suitable Business Space and Affordable Workspace** Clarity needs to be provided as to whether 10% of new employment floorspace being provided as affordable workspace is to take priority over the provision of affordable housing in mixed use developments. On many occasions, viability assessments need to be provided to demonstrate the maximum amount of affordable housing and the Council need to be clear as to whether 10% affordable workspace needs to be taken into account in appraisals prior to the assessment of the maximum amount of affordable housing. This is critical as on many development sites viability is constrained.	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified.	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace
Fifth State and (Avison Young obo)	2	EC 05	*Relates to Part 3, LNA SA 16* ***Draft Policy EC5 – Locally Significant Industrial Sites (LSIS) – formerly LEL*** The Owners and Developer of 5-9 Creekside have already provided commentary to draft Policy EC2 which requests that the principle of no net loss and the 65% plot ratio should be removed from the draft Local Plan, in order to be consistent with the adopted London Plan. Aside from this point, they broadly support the aims of draft Policy EC5 which supports the co-location of employment and other compatible uses at selected LSIS locations (including Lower Creekside). Part E of the draft Policy refers to LSIS listed in Part B; this should be corrected to Part C which provides the list of LSIS sites where co-location is supported.	Support noted. Policy cross-reference is an editorial error that will be rectified. Responses to representations on plot ratio set out elsewhere in the Consultation Statement.	Local Plan amended to appropriately cross-reference policy requirements.
Fifth State and (Avison Young obo)	2	EC 05	*Relates to Part 3, LNA SA 16* Part E states that where proposals come forward on LSIS co-location sites where an approved site-wide masterplan is not in place, Criteria in Parts F and G of the policy will apply. Part F(a) of this policy states that residential uses would not be supported, which conflicts with the proposed Site Allocation 16 (discussed later in this representation) which identifies that residential uses are considered to be compatible and suitable as part of a co-location scheme at Lower Creekside. The explanatory text on page 266 states that proposals for non-employment uses in LSIS would be resisted if a site wide masterplan has not been agreed or approved because the Council want to *'ensure that the employment generating function of LSIS land remains intact and is not eroded by the piecemeal introduction of non-employment uses'.* This approach is contrary to the aspirations of the London Plan, which states at Policy E7 that '*Development Plans and development proposals should be proactive and encourage the intensification*	Noted. The Council considers that masterplans are necessary to ensure certainty over the delivery of outcomes for LSIS sites where co-location is supported in principle. It is acknowledged that sites with multiple landowners and leaseholders may add complexity to the masterplan process. However, the requirement will ensure that the function of LSIS is not compromised through piecemeal development of	No change.

			of business uses, inter alia.' Further, Part D of Policy E7 sets out the principles for which developments proposing the co-location of uses must consider. We are of the view that it is unreasonable to restrict the principle of delivering residential uses within LSIS co-location schemes in the absence of a site wide masterplan being in place. Whilst we are working with adjacent land owners at 2 and 3 Creekside, this imposes a harmful policy control which is contrary to good planning practices. Notwithstanding this, where a number of sites are being brought forward as part of the wider regeneration of an area which include co-locating factors, the requirement for comprehensive masterplanning may be compromised by land ownerships etc. and ultimately delay the delivery of much needed accommodation, both employment and residential for the borough. As such we request that draft Policy EC5 acknowledges that a masterplan approach will not be necessary where sites have already been identified for co-location by virtue of a Site Allocation, which we consider will satisfy London Plan Policy E7 (as the co-location proposed is being plan-led). As such draft Policy EC5 Part E should be removed.	parcels of land within the LSIS, particularly where non-employment uses such as housing are introduced.	
Fifth State and (Avison Young obo)	2	EC 05	We consider that the requirement for quality design and placemaking principles are already secured via the relevant draft policies contained in Chapter 5 of the draft Lewisham Local Plan and would therefore request that Part F(a) is removed.	Disagree. Part F(a) does not relate specifically to quality of design and place making.	No change.
Fifth State and (Avison Young obo)	2	EC 05	Within the explanatory text on page 266, the draft Local Plan states that schemes which result in a net loss of industrial capacity will only be considered in very exceptional circumstances and goes on to state that *'proposals will be required to provide a minimum of 50 per cent of genuinely affordable housing on the residential element'.* Whilst this position is understood and reflects the London Plan position where there is a loss of industrial capacity, we consider it would be helpful to provide further clarity within the policy wording for proposals that would result in no net loss of industrial capacity schemes would be required to provide a minimum of 35% of genuinely affordable housing on the residential element (to qualify for the Fast Track Route in accordance with London Plan Policies H5 and E7).	Noted. The policy is relating specifically to proposals involving the loss of industrial capacity. The requirements for affordable housing are set out in Policy HO3. The plan must be read as a whole.	No change.
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	2	EC 05	*Relates to Call for site* **Policy EC5: Protecting Employment Sites and Delivering New Workspace** Draft Policy EC5 relates specifically to LSIS land and states that LSIS will generally be protected for a range of Class B and appropriate sui generis uses. It goes on to state that the co-location of employment and other compatible uses (including residential) will only be supported at selected LSIS locations that are proposed for allocation under Part C of Draft Policy EC5. This does not include our client's Site. The Council's decision making process for identifying some LSIS sites for mixed use allocation is not clear and as a result the policy approach is disputed. The Council notes that the proposed allocations for co-location are made having regard to the Lewisham Employment Land Study (2019) which assesses employment land supply in the Borough. The Study states that: *"Opportunities and constraints for redevelopment, intensification, extension, and refurbishment are considered, and if there is an opportunity, how much developable land is available. If there are constraints, we have outlined these and stated if they are likely to be, or can be, resolved within the plan period".*	We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change

			The Study provides an assessment of all designated employment sites against these criteria. We enclose the site assessment for Evelyn Street with these representations. The site assessment makes a series of broad brush statements about the Site, including that because of a lack of availability there are no opportunities for redevelopment, intensification and extension over the Plan period. The Study also states that because the Site is in a built up area it cannot be expanded. These statements cannot reasonably be used by the Council to make the judgement that the Site is not appropriate for co-location. This presents a soundness issue in so far as the Council's approach is not justified nor based on sufficient evidence. By way of example our client's Site measures 1.2 hectares and therefore is much larger than several other sites where the Employment Land Study suggests co-location would be appropriate. Table 1 below identifies several sites presented in the Study where clearly opportunities for co-location would be more challenging given their size, when also taking account of the policy requirement to ensure no net loss of industrial capacity. *LB Lewisham officer note: Table 1: Employment Land Recommendations is included in the original representation. It shows recommendations in relation to Blackheath Hill, Evelyn Street, Perry vale and Clyde Vale.* In light of the Council's substantial housing needs it should be looking to exhaust all opportunities to deliver development. The Council must therefore encourage the masterplan approach for other LSIS sites not identified in the Regulation 18 Plan. In the case of Evelyn Street, the Site could deliver a substantial mixed use development, that could also re-provide employment use and ensure no net loss of industrial capacity, whilst also delivering other strategic objectives including housing delivery (which could include affordable housing). The Site is also considered a suitable location for tall building development in the emerging Plan and is in a location where tall buildings are commonplace, including Deptford Wharves and Convoys Wharf. There are no designated heritage assets in its vicinity that would limit its suitability as a location for high density, mixed use development. The potential for impacts on the surrounding area could be dealt with through a sensitive design response as part of the masterplan process, without needing to stymy development of the Site through an overly restrictive policy approach based on insufficient evidence.		
Notting Hill Genesis (Savills obo)	2	EC 05	*Relates to Call for site* The Council's approach to the co-location of industrial uses and residential uses is set out within Policy EC5 (F) (a) of the draft Local Plan and states the following: "W*ithin LSIS proposals for non-employment uses (i.e those outside of the B Use Class) will only be supported where they; (a) Are not residential uses;..."* Policy E7 (Industrial Intensification, co-location and substitution) of the London Plan states that intensification of industrial capacity in selected parts of LSIS could be considered as part of a plan-led process of intensification and	Comments are noted. The designation of Malham Road Industrial Estate as an LSIS has been informed by the Lewisham Employment Land Study that identifies the site as a successful employment site with low vacancy rates and high	No change.

			consolidation, and this process could be used to facilitate the delivery of residential and other uses (our emphasis). In LSIS, the scope for co-locating industrial uses with residential and other uses may be considered, but this should also be part of plan-led or masterplanning process, and should not come forward through ad-hoc planning applications. We therefore consider that draft Local Plan Policy EC5 is **not consistent** with Policy E7 of the London Plan, which sets out that development plans and proposals should be proactive and encourage the intensification of business uses to facilitate the consolidation of an identified LSIS to support the delivery of residential and other uses as part of a masterplanning process. It is also **not consistent** with national policy which requires planning policies support development that makes efficient use of land. As such, we respectfully request that the wording of Policy EC5 (F) is amended as follows (additions are identified as underlined and deletions have a strikethrough, as illustrated below): "~~*Within LSIS proposals for non-employment uses (i.e those outside of the B Use Class) will only be supported where they (a) are not residential uses."*~~ *"Within LSIS, proposals for non-employment uses (including residential uses) will be supported where a comprehensive, design-led redevelopment scheme can be demonstrated; this could include the scope for collocating industrial uses with residential and other uses as set out Policy E7(D) of the London Plan."* LBL's Employment Land Study (2018) identifies that the existing units within Malham Road Industrial Estate are generally dated and that some units are coming towards the end of their economic life. The study further states that there is an opportunity to redevelop the more dated units to provide better quality units that meet modern occupier requirements. However, the current drafting of the policies are overly-prescriptive and insufficiently flexible, and therefore unlikely to support the site's full redevelopment potential. The draft Local Plan is therefore **not effective** and **not consistent** with national policy because it does not promote and support the development of under-utilised land and buildings.	demand for employment uses. Fragmentation of the site, through co-location, will restrict the operational nature of the employment uses, undermine the viability of this important LSIS and will be contrary to ensuring sufficient industrial land and capacity to meet the Borough's future needs.	
Stoken Properties Ltd (Boyer obo)	2	EC 05	*Relates to Call for site* It is understood that the site will be designated as a Locally Significant Industrial Location (LSIS) in the emerging Local Plan. Emerging Policy EC5 (Locally Significant Industrial Sites) aims to protect the employment capacity of such sites but recognises that there is potential for the co-location of uses, including residential, providing there is no significant reduction in industrial capacity.	Noted. Responses to additional representations set out elsewhere in Consultation Statement.	No change.
Stoken Properties Ltd (Boyer obo)	2	EC 05	*Relates to Call for site* *Response to Draft Policy EC5 (Locally Significant Industrial Sites (LSIS) – formerly LEL)* In response to Draft Policy EC5, firstly it is noted that the policy refers to *Class B Uses*. Existing Class B Uses are to be replaced with Class E uses and so we would seek clarity on this point. Whilst the overall objective of the policy to protect industrial capacity is supported, a clear distinction between industrial floorspace and people employed on site is needed. In the current and changing climate, it is felt that it is	Noted Our amended policy on LSIS is in accordance and supported by higher level policy and our Evidence base.	Local Plan will be updated to refer to new Use Class Order.

			unreasonable to class floorspace as “capacity”. Working practices have changed and there is no longer such a need for large industrial units, particularly in built up areas. Instead, there is a preference for smaller, more efficient workshops/offices that, whilst smaller in terms of floorspace, can provide a greater number of jobs than the previous operation which required a large floorspace. There therefore needs to be a clear distinction between floorspace and number of employees as if capacity in this regard relates to floorspace, it could restrict development and cause sites to become vacant and underutilised. In particular, Part D of the Policy confirms that proposals for the co-location of uses on the listed LSIS sites, which result in the net loss of industrial capacity, will only be permitted in exceptional circumstances. It is felt that a more pragmatic and reasonable understanding of “capacity” in the context of older industrial sites is needed and the policy made more flexible. Similarly, in Part D of the Policy whilst we support that provision should be made for at least 50 per cent affordable housing on any residential element of development, it is felt that viability should be taken into consideration. In some instances, especially in the case of older industrial units, the units are no longer fit for purpose and a significant amount of work and investment is required to bring them up to modern standards. Where this is the case, a residential element may be necessary in order to facilitate the overall development and given the significant costs, it may not be viable to provide 50 per cent affordable housing and so flexibility is required. *Policy Wording* We set out below our response to specific parts of the policy and how the policy should be worded. For consistency, throughout this letter, anything underlined is our proposed wording to the policy. Part A of the Policy states: *Locally Significant Industrial Sites will be protected for a range of Class B Uses (B1, B2 and B8) along with appropriate Sui Generis uses, with priority being given to Class B1 uses.* We would urge that this is amended to reflect the new planning use classes and reads as *“Locally Significant Industrial Site will be protected for a range of <u>Class E uses and B2 and B8 uses</u>, along with appropriate Sui Generis uses.”* Part D of the Policy states: *Proposals for the co-location of uses on LSIS sites listed in (C) above which result in the net loss of capacity will be strongly resisted and only permitted in exceptional circumstances…* We challenge the use of “capacity” when referring to the existing industrial use. We suggest that this is replaced with *“no net loss of <u>on-site employees</u>.”* This will provide clarity and will not act as a barrier for development proposals coming forward. Criterion d. of Part D advises that proposals for the co-location of uses should, amongst other things:		

			d. Makes provision of at least 50 per cent affordable housing on the residential element of the site. We suggest that criterion d. reads *"provision of at least 50 per cent affordable housing on the residential element of the site unless it can be robustly demonstrated that this is not viable."* This would ensure that potential redevelopment of older industrial sites are not discouraged due to high development costs and 50 per cent affordable housing not being achievable.		
Artworks Creekside (Avison Young obo)	2 2	EC 05 Page 266	*Relates to Part 3, LNA SA 16* ***Draft Policy EC5 – Locally Significant Industrial Sites (LSIS) – formerly LEL*** As with the commentary on Policy EC2, the principle of no net loss and the 65% plot ratio has been omitted from the adopted version of the London Plan and Policy EC5 D should be updated accordingly to reflect the requirement of the London Plan to ensure that within LSIS' intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses. Notwithstanding this, Artworks Creekside support the principle that co-location is allowed within the Creekside LSIS.	Noted. The London Plan provides that Local Plans can include provisions to retain SIL, LSIS and other industrial sites / capacity, taking into account local evidence. The Employment Land Study makes clear that Lewisham has experienced a significant loss of capacity and recommends that remaining capacity be retained in order to help meet identified needs over the plan period. The no net loss principle is therefore considered to be justified and in conformity with the London Plan. However it is acknowledged that the draft Local Plan definition of industrial capacity should be amended for conformity with the London Plan.	Local Plan amended to provide new definition of industrial capacity and removal of 65% plot ratio.
Artworks Creekside (Avison Young obo)	2 2	EC 05 Page 266	*Relates to Part 3, LNA SA 16* ***Draft Policy EC5 – Locally Significant Industrial Sites (LSIS) – formerly LEL*** Part E of the draft Policy refers to LSIS listed in Part B; this should be corrected to Part C which provides the list of LSIS sites where co-location is supported.	Noted. This is an editorial error that will be rectified.	Local Plan amended to make appropriate policy cross-reference.
Artworks Creekside (Avison Young obo)	2 2	EC 05 Page 266	*Relates to Part 3, LNA SA 16* ***Draft Policy EC5 – Locally Significant Industrial Sites (LSIS) – formerly LEL*** Part E states that where proposals come forward on LSIS co-location sites where an approved sitewide masterplan is not in place, Criteria in Parts F and G of the policy will apply. Part F(a) of this policy states that residential uses would not be supported, which conflicts with the proposed Site Allocation 16 (discussed later in this representation) which identifies that residential uses are considered to be compatible and suitable as part of a co-location scheme at Lower Creekside.	Noted. The Council considers masterplans are necessary to ensure certainty over the delivery of outcomes sought on site allocations, including the selected LSIS sites where co-location is acceptable in principle.	Local Plan amended to delete Policy EC5.E.

			The explanatory text on page 266 states that proposals for non-employment uses in LSIS would be resisted if a site wide masterplan has not been agreed or approved because the Council want to *'ensure that the employment generating function of LSIS land remains intact and is not eroded by the piecemeal introduction of non-employment uses'.* It is unclear whether this is agreed as part of a pre-application process, as part of a Site Allocation or requires a single planning application to consolidate all sites within a masterplan. In this latter scenario, this is a wholly restrictive and inappropriate control over the development of individual sites. Whilst we are working with adjacent land owners at 5-9 Creekside, this imposes a harmful policy control which is contrary to good planning practices. Furthermore, this approach is contrary to the aspirations of the London Plan, which states at Policy E7 that '*Development Plans and development proposals should be proactive and encourage the intensification of business uses, inter alia.'* Further, Part D of Policy E7 sets out the principles for which developments proposing the co-location of uses must consider. As with the Council's previous approach to 1 Creekside, if the proposals for alternative uses, specifically residential, meet the requirements of Policy E7 of the London Plan, and would intensify industrial use, the overarching policy requirement will still be met and adjacent sites, whether in retained industrial use or otherwise, are still considered as part of this determination process. Where a number of sites are being brought forward as part of the wider regeneration of an area which include co-locating factors, the requirement for comprehensive masterplanning that has been agreed or approach may be compromised by land ownerships etc. and ultimately delay the delivery of much needed accommodation, both employment and residential for the borough. The Council has extensive policy requirements to secure a design-led response to redevelopment and the requirement to ensure placemaking principles and the impact upon adjacent sites would therefore request that Part F(a) is removed.	However, it is acknowledged that Policy EC5.E could lead to confusion over the acceptability of uses with LSIS and should be deleted. This will provide more clarity for policy implementation, where criterion F deals exclusively with sites where co-location on LSIS is not supported.	
Artworks Creekside (Avison Young obo)	2	EC 05	*Relates to Part 3, LNA SA 16* ***Summary*** Paragraph 35 of the National Planning Policy Framework (NPPF) (2019), confirms the examination tests which will be applied to new Local Plans and spatial development strategies to ensure they have been prepared in accordance with legal and procedural requirements. Plans will be found 'sound' if they are positively prepared, justified, effective and consistent with national policy. Paragraph 36 of the NPPF states that the tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area. For the reasons set out above, we have particular concern that the direction for LSIS' are not consistent with the relevant strategic policies within the recently adopted London Plan. The current drafting of the draft Local Plan reflects a previous iteration of the Intend to Publish London Plan (2019) which was subject to a direction from the Secretary of State on 13th March 2020. In the absence of	Noted. Comments to detailed representations set out elsewhere in the Consultation Statement.	No change.

			the revision to the draft Lewisham Local Plan policies accordingly, alongside those other comments above, the Local Plan is considered unsound.		
Big Yellow Storage Company Limited (DWD obo)	2	EC 05	**Policy EC5 (Locally Significant Industrial Sites – formerly LEL)** Big Yellow **strongly objects** to Part B of this policy and **requests that it is deleted**. Part B states: *"Within LSIS, proposals for self-storage and larger format storage and warehousing facilities will only be supported in exceptional circumstances where:* *a. There is a demonstrable local need for this type of use;* *b. The use cannot be reasonably located in a Strategic Industrial Location; and* *c. The development will include provision of an element of floorspace for micro, small or medium sized businesses."* The explanation for this approach is set out as follows: *"In order to make the best use of land there will need to be a managed process of employment site intensification. The Lewisham Employment Land Study (2019) provides that the Borough's future requirements are primarily for Class B1 uses. We will therefore seek to resist proposals in LSIS that are solely for self-storage or larger format warehousing and storage facilities (normally included in the B8 Use Class). The built formats of warehousing units or self-storage facilities often do not provide for flexible re-use and are characterised by low employment densities, with limited opportunities for jobs compared to other development typologies. We need to ensure that these larger scale storage uses do not predominate on what is, in Lewisham, a very limited supply of employment land. However, it is acknowledged that storage facilities can help to support the wider regional economy, particularly the logistics sector. They also provide valuable space for smaller businesses and businesses requiring additional off-site provision. We will therefore consider proposals where applicants can show there is a local demand for the warehousing or storage use. Proposals must also demonstrate that there are no suitable or available sites in SIL where this type of development can be more appropriately located. This should include a detailed site survey investigating availability of sites both within and in proximity to Lewisham, including its neighbouring Boroughs and in those in the London southeast sub-region. All proposals for large format storage and warehousing should deliver an element of flexible workspace to meet needs of micro, small and medium sized business."* Big Yellow would like to make two points: 1. Big Yellow disagrees with the reductive assertion in the explanation that self-storage facilities are characterised by low employment densities. It is acknowledged that direct employment associated with self-storage facilities is low but there is a common misconception with respect to their overall contribution to supporting employment indirectly. *LB Lewisham officer note: Appendix B: Big Yellow Employment Survey is included in the original representation. It provides details of a survey carried out in February 2018 and collates the responses of 545 responses received.* Big Yellow has undertaken a survey (attached as Appendix B) of their existing stores to establish the employment impact of a Big Yellow store. This survey showed that the majority of customers of a store will be domestic, with the remaining 16% being business customers. Proportionally however, business	Noted. It is agreed that storage and warehousing uses can contribute positively to the local and wider regional economy. The Local Plan will therefore be amended to provide stronger support for the Class B8 Uses within SIL, which are considered the most appropriate locations for these uses. However officers do not consider that the policy should be deleted, as suggested. The Lewisham Employment Land Study (2019) identifies that the Borough's future requirements are primarily for Class B1 or similar commercial and industrial uses, and not B8. It will therefore seek that future development on LSIS helps to meet this identified need as a priority. The policy will be amended to provide that B8 uses may be acceptable where there is a demonstrable need or also 'market demand' for the use – this will provide greater flexibility for B8 uses to come forward.	Policy EC5.B amended to provide that B8 uses may be acceptable where there is a demonstrable need or 'market demand' for the use. Supporting text amended to reflect that Class B8 uses make a contributions to London's economy and do not necessarily result in low employment densities.

			customers usually occupy a greater area of floorspace, at 28% of the average store. This survey also showed that the main employment impact is not from direct employment (approx. 3 people per store). Instead, the main employment impact comes from the large number of jobs created by the business occupiers. The average Big Yellow store is home to 105 business customers, and the average business customer employs around three people directly because of their space in Big Yellow. This means that the average Big Yellow store directly accounts for over 300 jobs. The local economic benefit of this is significant – the jobs in the average Big Yellow generate a local Gross Value Added (GVA) of around £17m a year. This level of employment compares very favourably with many alternative employment uses. Allowing for non-business occupiers, and all the non-lettable space (like corridors, lifts, toilets and reception), it works out on average as one job for every 28 square metres gross internal area (GIA) across the whole store. This is a significantly higher job density than, for example, Class B2 Manufacturing at 36sqm GIA per job, or B8 storage/distribution at 70-95sqm per job. This means that a three-storey Big Yellow store would typically create four times as many jobs as a single-storey industrial unit of the same footprint. Across Britain, Big Yellow is home to over 7,700 businesses, and 23,000 jobs (assuming an average of 315 jobs per store). The businesses in Big Yellow together generate a GVA contribution to the national economy of over £1bn a year. Big Yellow is therefore a small-business landlord and startup incubator on a huge scale. On this basis, it is clear that self-storage uses provide a significant employment contribution and the view taken by the Borough to limit their development is not positive plan making and does not accord with paragraph 11 of the National Planning Policy Framework.		
Selkent Holdings (Daniel Watney LLP)	2	EC 05	*Relates to Part 3, LWA SA 09* **Policy EC5 – Locally Significant Industrial Sites** We welcome the introduction of Policy EC5 relating to Locally Significant Industrial Sites (LSIS) and the redefinition of these sites from Local Employment Locations (LELs) to ensure compatibility with the new London Plan. We accept the approach to being employment-led development and strongly welcome the approach taken through Part (C) which supports co-location of employment and other compatible uses at selected LSIS locations, including Willow Way. This co-location approach is appropriate for the Willow Way LSIS and aligns with the aspirations of the new London Plan, and the pre-application engagement undertaken by our client on their site, and therefore this designation should be retained. We are currently concerned over Part (E) of draft Policy EC5 as currently worded which states the following:	Noted. The Council considers masterplans are necessary to ensure certainty over the delivery of outcomes sought on site allocations, including the selected LSIS sites where co-location is acceptable in principle. However, it is acknowledged that Policy EC5.E could lead to confusion over the acceptability of uses with LSIS and should be deleted. This will provide more	Local Plan amended to delete Policy EC5.E.

			"For LSIS listed in (B) above [including Willow Way]*, where an approved site-wide masterplan is not in place, proposals for non-employment uses will be assessed against the criteria in (F) and (G) below, which also apply to all proposals for all other LSIS locations (i.e. not listed in (B) above)."* Parts (F) and (G) of the draft policy then go on to consider a range of restrictions including, but not limited to, a restriction on any residential uses in these locations. The supporting text then goes on to consider that "*in the interim period where a site-wide masterplan has not been approved or agreed by the Council, proposals for non-employment uses within LSIS will be resisted unless they meet the criteria of Policy EC5(E). This is to ensure that the employment generating function of LSIS land remains intact and is not eroded by the piecemeal introduction of non-employment uses*." The definition of site-wide masterplan needs to be elaborated upon here, due to the current ambiguity and barrier this could cause to development on such sites. Whilst we recognise the importance of individual schemes being designed in a way which does not prejudice or compromise its neighbours being brought forward for redevelopment in the future, particularly in wider site allocations, the explicit requirement for a site-wide masterplan could cause problems without a more refined definition. Given the numerous landowners within the Willow Way LSIS, there are varying levels of interest in redeveloping the entire site, from those landowners who are actively pursuing the option and engaging with the Council, to those who do not currently have the intention to redevelop. It will be impossible to have a single masterplan agreed by all landowners with a single planning application being brought forward for that masterplan across the whole site. We acknowledge that schemes would need to be cognisant of important masterplanning principles but believe this can be done through individual applications where necessary through detailed design measures and appropriate detailing, such as sufficient set-backs from neighbouring sites, positioning of units and windows to avoid future overlooking, and ensuring each sites takes its fair share of specific land uses including employment accommodation, residential accommodation, affordable housing, public realm and so forth. We would welcome the opportunity to discuss the definition of 'site wide masterplan' with policy planners ahead of the next stage of the Local Plan being issued. Our client is in early discussions with neighbouring landowners throughout the Willow Way LSIS so is acutely aware of the different levels of interest in bringing redevelopment forward. We would appreciate the opportunity to discuss how schemes can be brought forward using masterplanning principles and within a "site-wide masterplan" remit but not restricting landowners from bringing forward their own planning applications as and when they are ready to do so.	clarity for policy implementation, where criterion F deals exclusively with sites where co-location on LSIS is not supported.	

Big Yellow Storage Company Limited (DWD obo)	2	EC 06	2. Thirdly, London Plan Policy E6 (A) (2) states that development plans should make it clear that the range of industrial and related uses that are acceptable in LSIS include, where appropriate, hybrid or flexible B1c/B2/B8. This does not reference all Class B1 uses (such as Class B1a offices) as is presently supported by Part A. On this basis, it is our opinion that Policy EC5 does not accord with the London Plan.	Disagree. The London Plan policy EC6 provides that Local Plans make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8. Officers do not consider the policy precludes office uses where there is evidence of need for this. The land use principles for LSIS are informed by the Lewisham Employment Land Study, which states that the borough's principal needs are for office and light industrial uses, formerly in the Class B1 (now Class E(g).	No change.
Millwall Football Club (CBRE Ltd obo)	2	EC 06	*Relates to Part 3, LNA SA 08* **(7) Mixed Use Employment Locations (MELs)** The Surrey Canal Triangle is identified as a Mixed-Use Employment Allocation (Draft Policy EC6). The requirements of parts A and B + C of this policy pull in different directions when the practicalities of implementing the policy is considered. Part (A) requires that *'all development within MELs must be delivered in accordance with relevant site allocation policies and a sitewide masterplan.'* This approach is sensible and provides a framework around which to consider the application proposals at Surrey Canal Triangle. However, Part B and Part C both require that development proposals will be required to maximise the amount of Class B1 employment floorspace through site redevelopment. They further state that proposals will be expected to make provision for new modern workspace and associated operational land. Furthermore, Part C states that all future proposals involving the redevelopment or change of use of land or floorspace must: ▪ Retain, and wherever possible seek to increase the proportion of industrial capacity (including Class B floorspace) across the MEL, as originally approved in the masterplan; and ▪ Ensure that there is no let loss of existing industrial capacity. The ability to meet this objective is likely to present conflict with the requirements to expand and improve the stadium and the stadium land should be identified as being exempt from these policy requirements. Any requirement to co-locate employment development alongside expansion to the stadium is likely to introduce additional conflicts (compared to other uses) for the safe	Support for part A is noted. Agree that proposed works to the stadium will not be required to provide industrial floorspace where it can be demonstrated that it would be incompatible with the use of the stadium. This will be assessed through the Development Management process.	Local Plan amended by referring to the operational requirements of differing land uses and the Agent of Change principle.

			access and egress of fans on matchdays. It is likely that the commercial attractiveness of any employment development in close proximity to the stadium could be limited by the need for matchday/weekend controls on employment uses which could limit the way businesses can use the units and ultimately how attractive the units are. This attractiveness of development that is provided alongside the stadium expansion is a key consideration when set against the previous comments raised with respect to the stadium expansion and redevelopment being delivered by enabling development. A simple amendment is required to the site allocation policy and/or Draft Policy E6 to confirm that the proposed works to the stadium will not need to comply with the requirements set out in E6.		
L&Q Group	2	EC 06	*Relates to Call for site* This should also be reflected in Policy EC6 which should be updated to accord with the most up to date Use Classes Order, including the new wider E class use. As part of the final amendments to the London Plan, the SoS is clear that the aspiration in the NPPF is that Local Plans 'provide' sufficient industrial land, rather than simply 'retain' it, taking account of the need of both residential and business communities.	Noted.	Local Plan amended to reflect the changes to the Use Class Order, including the new Class E.
L&Q Group	2	EC 06	*Relates to Call for site* Within the supporting text of Policy EC6, there is a lot of detail on the evidence required to demonstrate the uplift in jobs through re-provided commercial use. Notably jobs during the construction period will not be considered as part of the uplift. We note that the quality of the employment provision will also be taken into consideration – more clarity is required about what this entails.	Noted. It is considered that the supporting text provides sufficient detail to address requirements around jobs uplift. However it is recognised that there may be implementation issues with respect to job quality, and as such this criterion will be removed.	Local Plan Policy EC6 amended to provide clarifications on requirements for jobs associated with new workspace delivered in MELs.
Lendlease (Lichfields obo)	2	EC 06	*Relates to Part 3, LNA SA 02* **Economy and Culture** *Policy EC6 Mixed-use Employment Locations (MEL)* Lendlease has concerns about the restrictive nature of parts B and C(a) of this policy. In particular, part B states that development proposals *'will be required to maximise the amount of Class B1 employment floorspace through site redevelopment, along with providing a demonstrable and significant uplift in the number and quality of jobs'.* More flexibility should be applied here, requiring that the uplift in number and quality of jobs is secured through 'a range of commercial uses', rather than the restriction to B1 floorspace. The site allocation for Deptford Landings (paragraph 15.27) refers to the 'provision of commercial floorspace in line with Policy EC 6', however as mentioned above, Policy EC6 refers specifically to B1 floorspace. It is therefore requested that EC6 is updated in line with the site allocation. Furthermore, it is unclear if Part B applies to sites such as Deptford Landings which have an approved masterplan.	Noted. Agree that more flexibility should be applied to the range of uses specified given role of MELs. Officers disagree that the policy should refer instead to net loss of jobs. MELs are designated employment land and therefore it is considered appropriate to retain industrial capacity. The policy is considered flexible enough to address revisions to masterplans and revisions to planning consents, as these will all be considered through the	Noted. Policy for MEL amended to provide support for a range of commercial uses, including workspace (with priority given to office and light industrial where workspace is delivered).

			Part C(a) is similarly restrictive and does not allow for revisions to approved masterplans over time, due to changing economic circumstances or shifting demand. This is particularly important in the current economic climate and the implications which have been presented by Covid-19. It is considered that the wording of this policy should be amended to permit a caveat which states that where changes of circumstance require a revision of the masterplan, or there is a benefits case for alternative uses to come forward, the loss of employment land may be acceptable provided that job creation figures are maintained. Rather than referring to a 'net loss of existing industrial capacity', the policy should refer to a 'net loss of jobs', allowing for more flexibility while securing the economic benefits of development.	planning approvals process.	
Notting Hill Genesis (Savills obo)	2	EC 06	*Relates to Call for site* In addition to the above, it is noted that the wider Malham Road Industrial Estate has a wide range of existing uses outside of commercial and light industrial use, including a place of worship, hot food takeaways and residential. In light of the wide range of existing uses, including those Use Class E units (which benefit from Permitted Development within the Use Class) as well as the underutilised nature of the industrial units, as set out within LBL's Employment Land Study (2018), it is considered that the site should be designated as a Mixed- Use Site Allocation to include industrial and residential uses, which would be more fitting to its function. There is a significant opportunity for the site (and potentially the wider Malham Industrial Estate) to meet a range of priorities for Lewisham. There is the opportunity the site could deliver a mixed use redevelopment which could include the delivery of an enhanced employment provision, new homes and new affordable homes.	Noted. The designation of Malham Road Industrial Estate as an LSIS has been informed by the Lewisham Employment Land Study that identifies the site as a successful employment site with low vacancy rates and high demand for employment uses. Fragmentation of the site, through co-location, will restrict the operational nature of the employment uses, undermine the viability of this important LSIS and will be contrary to ensuring sufficient industrial land and capacity to meet the Borough's future needs.	No change.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	2	EC 06	*Relates to Part 3, LNA SA 14* **Policy EC6 Mixed-use Employment Locations** We note that in relation to Mixed-use Employment site allocations, Policy EC6 states that: *"A) The comprehensive redevelopment of Mixed-use Employment Locations will be supported in order to facilitate their renewal and regeneration and to secure provision of new modern workspace. All development within MELs must be delivered in accordance with relevant site allocation policies and a site wide masterplan.* *B) All new development will be expected to protect and enhance the employment generating function of MEL land. Development proposals will be required to maximise the amount of Class B1 employment floorspace through site redevelopment, along with providing a demonstrable and significant uplift in the number and quality of jobs."* Paragraph 22 of the NPPF states that long-term protection of sites for employment uses should be avoided where there is no reasonable prospect of the site being used for allocated employment uses. We therefore consider the	Noted. The suggestion to incorporate homes in the policy text is noted, however the policy is dealing principally with MELs as designated employment land and focusses on employment provision. Notwithstanding this, the policy makes clear that MELs include provision for a mix of uses. In principle support for residential uses is established through corresponding site allocations.	No change.

			requirements of the above policy are **not consistent** with national policy. This could also have an effect on unnecessarily constraining development and would therefore **not be effective** in its delivery. As such, we request that the wording of Policy EC6 be amended as follows (the additions are shown underlined): *A) The comprehensive redevelopment of Mixed-use Employment Locations will be supported in order to facilitate their renewal and regeneration and to secure provision of new modern workspace and homes. All development within MELs must be delivered in accordance within the relevant site allocation policies and a site wide masterplan where there is demand for the proposed uses.* Making these changes would ensure that the draft Local Plan **is consistent** with national policy and **effective** in its delivery.		
Cockpit Arts (The Planning Lab obo)	2	EC 06	*Relates to Part 3, LNA SA 14* • CA is generally supportive of the MEL designation that covers the Sun Wharf site allocation, and the emphasis on protecting and enhancing the employment-generating function of this land. However, we note conflicts with this policy and the Sun Wharf allocation (SA14) – which do not reflect current/live development proposals for residential led development and that could render the policies out of date prior to adoption. • We strongly endorse the requirement for development within MELs to be delivered in accordance with a masterplan. This is needed to ensure that non-employment uses brought forward within a MEL do not stymie future employment-led development within that area. • We note that the new Plan recognises that the requirement in the previous version for development in MELs to deliver 20% of new floorspace as office floorspace was not being met. How will delivery against the requirement for development proposals to 'maximise the amount of employment floorspace' be assessed/measured/enforced? • How will this policy be applied to applications already under consideration in MELs which do not meet these policy requirements, including in terms of delivering according to a masterplan or in terms of maximising floorspace? • What steps will LB Lewisham take where different developments are coming forward within a MEL - at different times and by different owners - to ensure each is shouldering the right level of responsibility in terms of the provision of employment space?	Noted. All MELs have corresponding site allocations, which necessitate that development must be delivered through the masterplan process. The Part 4 policy on masterplans and comprehensive development provides further details. Planning applications will be considered in accordance with the development plan unless material considerations indicate otherwise.	No change.
The Renewal Group (Carney Sweeney obo)	2	EC 06	*Relates to Part 3, LNA SA 08* **Policy EC6 Mixed Use Employment Locations (MEL)** Again, policy EC6 needs to be updated to reflect final changes to the London Plan prior to its adoption and publication, changes to the use classes order, in particular the new Use Class E and the imminent amended permitted development rights later this year. The Inspector considering the Westminster Local Plan in 2020 made clear the importance of this.	Noted.	Local Plan amended to reflect and respond to changes to permitted development rights and the Use Class Order, including the new Class E.
Big Yellow Storage Company Limited (DWD obo)	2	EC 07	**Policy EC7 (Non-Designated Employment Sites)** Big Yellow **supports** part A of this policy, which seeks to resist development proposals that result in the net loss of viable industrial capacity.	Support noted.	No change.

			Big Yellow also **supports** parts B and C of this policy on the understanding that they simply provide in principle support for employment-led, mixed use development on these sites, and do not place a requirement for such proposals.		
The Arch Company Properties LP (Turley obo)	2 2	EC 08 Paras 8.21 and 8.44	***Draft Policy EC8 (Railway Arches)*** As one of the majority land owners of railway arches in the borough, our client welcomes that the Council recognises that *"there are opportunities to maximise the use of the space of [railway] arches and the ancillary land adjacent to them"* (para. 8.44). As set out above, operating a vast number of railway arches across London, The Arch Company considers that these can cater for a wide range of uses and occupiers and be a significant contributor to the Council's ambition of building a strong economy. Railway arches further have the potential to positively contribute to the vitality and vibrancy of an area and to promote its resilience through a diversity of uses, particularly within or in close proximity to town centres. Depending on their location and surrounding uses/occupiers, railway arches should therefore be able to cater for a wide range of uses including industrial, commercial, community (i.e. gyms), economic (i.e. workspace) and/or storage and distribution uses, but also wider town centre and leisure uses (where appropriate), in order to provide the flexibility that is required by (potential) occupiers when adapting to market needs/demand and to ensure that they actually meet their full potential. At present, the draft policy wording is unfortunately considered to be somewhat unclear and potentially restrictive to future development, thereby limiting the use of railway arches where this may lack flexibility and in turn be detrimental from an economic (recovery) perspective. Similar to what is reflected in other (emerging) railway arch policies across London, it is recommended to refine the draft wording in order for it to: 1. Be fully effective; 2. Be responsive in respect of the impacts of the COVID-19 pandemic and our economic recovery; 3. Provide (small/local) businesses and future occupiers with the flexibility as well as clarity required to invest in an area; and 4. Ensure that railway arches can accommodate a wide range of (acceptable) uses. As such, our client recommends the following amendments to the draft policy wording: *"A. Development proposals involving railway arches will be supported where:* *a1. The principal use is for an appropriate commercial (including town centre, community, leisure and/or business uses) or industrial use (Class E(g)(ii)/(iii), B2 and B8), certain sui generis uses in appropriate locations where these do not cause harm to the amenity of surrounding uses and occupiers, or otherwise for an operational use associated with the railway;*	Agree that there could be further clarity and flexibility in how railway arches can cater for a diversity of land uses.	Policy supporting text amended to make clear that appropriate uses will be considered on a case-by-case basis having regard to Local Plan policies which set parameters for land uses in specific locations (e.g. town centres, designated employment areas and non-designated employment sites).

			a2. In designated employment [or industrial] areas (i.e. LSIS, SIL) or Non-Designated Industrial Land, the principal use shall be limited to appropriate Class E(g), B2, B8 uses and/or related sui generis or other uses that relate to, and support, the industrial nature and operation of the area, or otherwise for an operational use associated with the railway, unless where they form part of a masterplan-led redevelopment (see Part B); *[…]"* Part a2 has been added to provide clarity on acceptable uses within railway arches in designated employment areas and/or industrial land (i.e. LSIS, SIL, MEL or Non-Designated Industrial Land). It is important to differentiate between designated industrial and other locations to provide businesses and occupiers with the clarity they need.		
The Arch Company Properties LP (Turley obo)	2	EC 08	Our client is supportive of establishing a new railway arches policy (Draft Policy EC8), but has proposed suggestions to ensure it is clear and effective in order to provide the flexibility required to operate these arches in the best possible way which adequately reflects occupier demand, day-to-day operational/letting requirements and market conditions.	Noted. Reponses to other detailed representations set out elsewhere in the consultation statement.	No change.
The Arch Company Properties LP (Turley obo)	2 2	EC 08 EC 04	In relation to Part A(e), it is recognised that a number of railway arches may offer low-cost business space, however, these are market levels and reflective of their (often) lower specification and non-prime locations (as acknowledged in para. 6.2.4 of the London Plan and elsewhere in the Draft Local Plan, i.e. para. 8.21). Similarly, there is a significant difference between open arches accommodating a simple storage function and those that are (subsequently) refurbished to a higher specification attracting different types of uses and occupiers. As such, it is first of all important to differentiate between existing low-cost (i.e. as described above) and affordable (i.e. as secured through a Section 106 Agreement) business space. Where such a Section 106 Agreement exists for a site or where railway arches form part of a wider (comprehensive) redevelopment, it is considered acceptable to link it to the requirements of *Draft Policy EC4 (Providing suitable business space and affordable workspace)*, however, in all other cases the nature of a proposed development will need to be fully considered, as future investment in or upgrading existing railway arches may otherwise be constrained or undermined (i.e. if such future rent levels would not be reflective of their higher quality specification or a change of use). It will therefore be important to avoid a misconception in this area with wider policies in the Draft Local Plan (i.e. Draft Policy EC4 referred to above) and it is recommended to **(1)** remove reference to 'lower-cost' workspace from Part A(e) of the draft policy wording and **(2)** to cover the provision of affordable workspace in Draft Policy EC4 only (see comments/suggestions below). However, the supporting text to Draft Policy EC8 may clarify that railway arches often provide low-cost business space (as set out above and in the London Plan) which may be re-provided if the nature of the proposals remain comparable and/or that Draft Policy EC4 applies where railway arches form part of a wider comprehensive redevelopment.	Disagree that low cost workspace and railway arches should be removed from EC 08 Part A(e) and EC 04 Part D but that there is merit in providing greater clarity when affordable workspace can be retained.	No change to policy EC 04. Local Plan (EC 08 part Ae) has been amended to provide greater clarity on retaining or re-providing affordable workspace.
The Arch Company	2	EC 08	Whilst we recognise the importance of consultation with key stakeholders prior to the submission or during the determination of a planning application, it is considered that Part C of the draft policy wording may be onerous for future	Agree that there should be more flexibility in terms of	Local Plan (EC 08 part C) has been amended to provide greater

Properties LP (Turley obo)			applicants. Network Rail and Transport for London ("TfL") may not both have an interest in the railway lines above respective arches and/or their asset(s) and/or TfL-managed roads may not be affected by the nature of the development proposals (i.e. a simple change of use). The policy wording should therefore be amended to state that: *"Network Rail and/or Transport for London should be consulted on development and design options where appropriate and required to ensure that development will not adversely impact on the public highway and rail network, or preclude the delivery of planned transport infrastructure"*.	consulting with transport stakeholders.	flexibility when consulting with transport stakeholders.
GHL (Leegate) Limited (Frank Knight obo)	2	EC 09	*Relates to Part 3, LEA SA 03* Policy EC9 (Workplace training and job opportunities) explains that all proposals for major development will be required to provide job and training opportunities to Lewisham residents, including apprenticeships, secured by way of planning conditions or S106 obligations.	Noted.	No change.
Barratt London and the Church Commissioners (Avison Young obo)	2	EC 10	*Relates to Part 3, LCA SA 20* **Draft Policy EC10 Town centres at the heart of our communities** Barratt London and the Church Commissioners strongly support this Draft Policy which focuses future growth and investment within and around town centres, particularly to optimise the use of land. The delivery of an appropriate mix and balance of residential and main town centre uses within town centres is also strongly supported.	Support noted.	No change.
WSP (Sainsbury's Supermarkets Ltd obo)	3 2	LNA SA 09 EC 10	81. For these reasons the loss of the Sainsbury's store will directly conflict with the new Local Plan Policy EC10: Town Centre at the Heart of Our Communities. 82. In summary, the detailed technical work that has been undertaken on behalf of the developers confirms that the retail impact of the loss of the Sainsbury's store and existing retail warehouses will have substantial negative short-, medium- and long-term implications for the local community. These findings are supported by the Council's own retail evidence base. 83. The impact of the closure of the Sainsbury's store and the existing retail warehouses on New Cross/ New Cross Gate District Centre is a legitimate planning concern that must be taken into consideration as part of the new Local Plan process.	Comments are noted. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 10	**Retail** 11.7 The Reg 18 Plan includes a set of new draft retail policies (EC10 to EC14 inclusive are relevant). 11.8 Draft policy EC10 'Town centres at the heart of our communities' reflects the approach of the London Plan and national policy in seeking to focus development in existing town centres. This policy highlights that town centres will be managed positively in order to ensure they are attractive and vibrant places that are resilient and adaptable to future challenges. These are identified to include those presented by new technology and changes in consumer behaviour. Reflecting future changes, the supporting text to this Policy (para. 8.53) highlights that: *"Whilst online shopping is affecting the retail sector, traditionally a stronghold of town centres, this has opened opportunities for the re-use of buildings.*	Support noted. We believe the Local Plan provides the appropriate balance between protecting the retail function of the town centre whilst providing flexibility in town centre uses to allow them to adapt.	No change.

			Complementary cultural, leisure and community uses are increasingly taking up space in town centres, helping to attract visitors. Furthermore, town centres are now becoming a focal point for higher-density mixed use development, including housing. Whilst protecting the retail function of the Borough's town centres is crucial, we will seek to ensure that centres are able to evolve and adapt over time, so that they continue to support the communities in which they are situated." 11.9 This approach is supported by Landsec, however following our conclusions set out in Chapter 5 and 7 of this report, we would urge the Council to strengthen this objective through the site allocations and town centre policies. 11.10To achieve the long-term vitality and viability of Lewisham's town centres, draft Policy EC10 states that this will be secured through a number of measures. This includes delivering an appropriate mix and balance of residential and main town uses in order to attract visitors and ensure people have good access to a competitive range of services and facilities by seeking to define a broad range of matters that comprise vitality and viability. The draft policy also recognises that there is a need to ensure that town centres remain resilient and adaptable to change over the long-term. 11.11Within this context, whilst protecting the retail function of the Borough's town centres is crucial, the ability for town centres to evolve and adapt over time, so that they continue to support the communities in which they are situated is welcomed.		
Canada Life Ltd (Williams Gallagher obo)	2 2	EC 11 Table 8.2	*Relates to LCA SA 22* **Other Comments** **Policy EC11: Town centre network and hierarchy -** We support this policy in combination with Figure / Table 8.2 which includes Site 22 within the Catford Town Centre Boundary.	Support noted.	No change.
Barratt London and the Church Commissioners (Avison Young obo)	2	EC 11	*Relates to Part 3, LCA SA 20* **Draft Policy EC11 Town centre network and hierarchy** Barratt London and the Church Commissioners broadly support the Draft Policy but request it acknowledge that housing can be a complementary use within town centres. The Council clearly supports mixed use development in Catford Town Centre as demonstrated by Draft Policy EC10 and the emerging allocations which seek housing alongside town centre uses including on the Plassy Island site (further details concerning this matter are included in below sections of this Representation).	Noted. The policy already recognises the need to deliver an appropriate mix and balance of residential and main town centre uses. Land use principles are also established in the site allocation policies.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 11	*EC11* 11.12Policy EC11 'Town centre network and hierarchy' seeks new development to support and reinforce Lewisham's town centre network and hierarchy. This Policy specially refers to the Borough's future retail needs over the period 2020 to 2030, which is identified to be 5,300 sqm (net), and that this should be focused in Lewisham and Catford town centres in the first instance. For the reasons set out above, the forecast needs of the borough will need to be updated through a new evidence base and household survey. 11.13The supporting text (para. 8.60) outlines that this floorspace requirement is derived from the findings of the LRCSU. Notwithstanding that the LRCSU (and	We believe that the evidence base prepared for the Local Plan reflects a proportionate response in accordance with higher level policy.	No change.

			Local Plan Policy and text) needs to be updated by utilising up-to-date survey evidence and applying the latest data available, further clarity is provided on what this floorspace represents. The policy wording does not clarify that any future retail need is in the convenience retail sector only and that there is no capacity for further comparison floorspace. As currently worded, the Policy could be interpreted as suggesting that there is a requirement to deliver 5,300 sqm of retail floorspace(i.e. both convenience and comparison goods floorspace) between 2020 and 2030. Further clarity within the wording of Policy is therefore required. 11.14Furthermore, part (c) of draft Policy EC11 needs to be amended to reflect the position of the London Plan and make reference to the 'potential' future reclassification of Lewisham as a Metropolitan Centre. *"EC11(C) Development of Lewisham town centre and its surrounds will be proactively managed in order to secure its potential future reclassification as a Metropolitan centre…."* 11.15The supporting text identifies that Lewisham town centre is a key focal point of the Borough and is its principal shopping and leisure destination as well as a major transport hub. Whilst Lewisham is currently defined as a Major centre, it is undergoing significant transformation and offers the potential to be reclassified as a Metropolitan centre in the future, as indicated by the London Plan. The town centre already benefits from excellent public transport links, and the proposed Bakerloo Line Extension (BLE) route with a key interchange at the centre would further entrench the sub-regional importance of the centre. The Reg 18 Plan will supersede the LTCLP (2014) in setting the strategic framework to deliver the vision for a Metropolitan centre. This should conform to the London Plan and refer to the 'potential' for Metropolitan classification in respect to paragraph 8.58.		
QUOD (Landsec obo - Lewisham Shopping Centre)	1 2	Strategic Objective 7 EC 11	**7 Strategic implications for Lewisham Town Centre** 7.1 The Council has had a longstanding aspiration to elevate Lewisham town centre to metropolitan status. The adopted Core Strategy (2011) promotes Lewisham Town Centre to Metropolitan status by 2026. The LTCLP repeats this vision and contains policies to deliver Metropolitan status. 7.2 The emerging Local Plan maintains the policy aspiration for Lewisham town centre to achieve Metropolitan classification – Strategic Objective 7. Likewise, the London Plan states that Lewisham will grow in function and population and has 'potential' to become a town centre of Metropolitan importance. 7.3 Draft Policy EC11 'Town centre network and hierarchy' states that Lewisham town centre will be proactively managed in order to secure its future reclassification as a Metropolitan centre. This includes *"supporting investment and facilitating delivery of strategic infrastructure necessary to ensure the centre can effectively serve a local and wider subregional catchment".* 7.4 The London Plan also states that Lewisham will grow in function and population and has 'potential' to become a town centre of Metropolitan	The approach taken in the Local Plan aligns with the findings of the Retail Impact Assessment and Town Centre Trends Study and is in conformity with the London Plan, that identifies Lewisham as a having the potential to become a Metropolitan Centre in the future.	Local Plan amended to expand upon how the town centre will evolve to become Metropolitan status.

			importance. The potential for further growth at Lewisham will be supported by the arrival of the Bakerloo line at Lewisham Interchange to bring enhanced access to central London and encourage the delivery of employment, leisure, service and community uses that serve the local and sub-regional population. 7.5 Public realm and environmental enhancements of the town centre and surrounding employment, mixed-use and residential re-developments will continue to be delivered and will assist the continued transformation of Lewisham into a high performing and vibrant retail hub with excellent leisure services. 7.6 The Reg 18 Plan seeks to deliver this potential by aspiring to be a Metropolitan Town Centre by 2040 with the arrival of the Bakerloo line extension together with the modernisation of Lewisham Interchange. 7.7 Landsec recognise this potential and supports Lewisham's 'aspiration to be a Metropolitan Centre'. However, Landsec would urge a degree of caution. The Reg 18 Plan whilst being aspirational should also be deliverable. It should reflect the London Plan's objective of the 'potential' for Metropolitan status. However, due to the challenges of delivery and the structural change of town centres summarised in these submissions, the full implications for town centres are not yet fully understood thereby necessitating a degree of flexibility. 7.8 Historically, local planning policy identified that the vision to achieve Metropolitan status was based on a requirement for considerable growth in comparison retail floorspace. This position was reached within a different retail context, namely one where the available retail evidence (published in 2009) suggested that there was substantial scope for further retail floorspace in Lewisham town centre. 7.9 As outlined above, there has been a fundamental shift in the retail sector in recent years meaning that it is no longer the case that there is substantial capacity for further retail floorspace. Instead, there is very limited capacity (or commercial demand) for expansion of Lewisham town centre and there is an identified oversupply of retail floorspace together with substantial vacant floorspace (including in the primary shopping area). This position is not unique to Lewisham and is reflected across for town centres in London and elsewhere in the UK. 7.10 As a result of this permanent and irreversible shift in the retail sector there is a need for Lewisham to consolidate its existing town centre offer, rather than looking for substantial expansion, if the Council's aspiration for maintaining the viability of the town centre is be achieved. The creation of substantial new retail floorspace when there is no demand, will simply duplicate the existing offer, diluting Lewisham's overall offer, and will not improve the overall offer. 7.11 The London Plan includes a historic definition of a Metropolitan Town Centre. It serves wide catchments which can extend over several boroughs and into parts of the Wider South East, typically containing at least 100,000 sqm of retail, leisure and service floorspace. The evidence		

			base for the Reg 18 Plan does not yet support such a position for Lewisham town centre in meeting the Council's objective of achieving metropolitan status. The Council's aspiration was to achieve Metropolitan Town centre status by 2026. This has now been pushed back in the Reg 18 Local Plan to 2040. At the same time the Council's town centre floorspace growth forecasts have reduced significantly over the past decade, and it is not expected that these will improve over the life of the development plan. 7.12 Given the fundamental change in the retail sector it is necessary to rethink how Lewisham town centre moves forward over the Plan period, and how future growth can be secured. This needs to be reflected in the Reg 18 Plan. It is no longer viable or appropriate to seek to achieve Metropolitan status based purely on increasing retail floorspace within Lewisham town centre – as was the approach advocated by adopted local planning policy. In any event, such an approach is not advocated by strategic policies, or supported by the evidence base. 7.13 The London Plan identifies that the 'potential' for Lewisham to become a town centre of Metropolitan importance is linked to its function and population. Specifically, the London Plan identifies significant residential developments around the town centre coming forward, such as Lewisham Gateway, and the arrival of the Bakerloo line at Lewisham Interchange as factors that could contribute to elevating Lewisham's status. Significantly, the London Plan does not explicitly refer to the need for additional floorspace, but the creation of a 'high performing' and 'vibrant' retail hub.		
QUOD (Landsec obo - Lewisham Shopping Centre)	1 2 3 3 3	OL 01 EC 11 LCA LCA SA 01 LCA SA 02	7.14 Within this context, to deliver the ambition for Metropolitan status, we consider that the following adjustments would assist the Council in the soundness of the plan making process. - The Reg 18 Plan should conform to the London Plan and refer to the 'potential' for Metropolitan classification (OL1; EC11; Chapter 14; LCA1; LCA2). - The Reg 18 Plan should conform to the London Plan and align itself with the qualitive growth aspirations set out in paragraph 2.1.19 - further growth supported by the arrival of the Bakerloo line at Lewisham Interchange; enhanced access to central London; encourage the delivery of employment, leisure, service and community uses that serve the local and sub-regional population; public realm and environmental enhancements; surrounding employment, mixed-use and residential re-developments; the continued transformation of Lewisham into a high performing and vibrant retail hub; with excellent leisure services. - The Reg 18 Plan should refer to the need to apply the London Plan Annex 1 definition of Metropolitan Town Centre flexibly to reflect the changing nature of town centres. The forecast role and function of town centres is unlikely to relate to traditional numeric definitions of floorspace quantum's, rather one based on public transport accessibility, retail performance and vibrancy – as acknowledged in the London Plan. More floorspace is not always better as the Mayor of London reports in his 'High Streets and Town Centres Adaptive Strategies' (2019).	Agree that the redevelopment of Lewisham Shopping Centre will act as a catalyst. The approach taken in the Local Plan is in conformity with the London Plan, that identifies Lewisham as a having the potential to become a Metropolitan Centre in the future.	Local Plan amended to expand upon how the town centre will evolve to become Metropolitan status.

			- The outcomes that are secured through investment in a town centre such as jobs, homes, businesses, health and wellbeing, safety, permeability, building beautiful, carbon reduction, accessibility, culture, happiness and urban greening are likely to become the new ingredients for success and ambition of potential Metropolitan status. - The Council should work with the GLA to revise the current definition of Metropolitan town centres to reflect their changing nature. There is a clear ambition to adapt, survive and thrive. - The Reg 18 Plan should support the consolidation of retail floorspace as an objective which aids vitality and viability and which can achieve the wider ambition of Metropolitan status. 7.15 The future of Lewisham Shopping Centre is clearly a catalyst to achieving these outcomes as the largest most central site in Lewisham town centre. Landsec is keen to work proactively with the Council in seeking to achieve the aspirations of growth in a flexible and deliverable way.		
GHL (Leegate) Limited (Frank Knight obo)	2	EC 12	*Relates to Part 3, LEA SA 03* Policy EC12 (Location of new town centre development) promotes a town centre approach. GHL broadly supports this approach but requests that these policies be amended to reflect the flexibility envisaged by the new Use Class E, which effectively removes the Council's ability to control changes of use within Use Class E. It is accepted that with the changes to the Use Class Order and notably through the introduction of Use Class E which permits the change of use from existing retail floorspace to other commercial uses. These changes were introduced to enable flexibility required for businesses to respond to the COVID-19 pandemic, it's impacts or benefits aren't yet fully understood in light of national lockdowns, but should be supported to maintain town centre viability and viability, alongside other 'main town centre uses'. Therefore, planning policies need to promote flexibility of land uses, and support other 'town centre uses' within Lewisham's town, district and local centres.	Noted.	Local Plan amended to reflect and respond to changes to the Use Class Order, including the new Class E.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 12	*EC12* 11.16Whilst not directly related to the shopping centre Policy EC12 refers to demonstrating a 'need' for town centre floorspace. There is no longer any policy requirement to demonstrate need for retail and leisure proposals. The wording of Policy EC12 should be revised to reflect this.	Noted.	This policy has been removed from the plan to make it more concise
Freeths LLP (K/S Lewisham obo)	2	EC 13	K/S welcomes Policy EC13 relating to optimising the use of town centre land and floorspace. When assessed against this draft policy, the Site is well-suited to redevelopment to contribute towards the strategic needs of the Town Centre.	Support noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	2	EC 13	*Relates to Part 3, LEA SA 03* Policy EC13 (Optimising the use of town centre land and floorspace) adds that development proposals should optimise the use of land and floorspace within town centres by delivering new mixed-use schemes. GHL supports this ambition. Equally, while Lewisham's town, district and local centres are the main retail, leisure and recreation destinations within the borough, they face a number of significant challenges, notably the changing nature of retail that has been hastened by the COVID-19 pandemic. GHL strongly supports the continued focus of retail, leisure and recreation development within district centres. However, it should be acknowledged that successful centres in a post pandemic world will	Support noted. The draft Local Plan is considered to provide sufficient flexibility for a wide range of uses to support town centre vitality and viability. It is acknowledged that changes to the plan are required to reflect new planning legislation.	Local Plan amended to reflect and respond to changes to the Use Class Order, including the new Class E.

			need to be more than just retail focused with an appropriate balance struck with other town centre uses. GHL also supports the Council's remarks that the diversification of uses in Lewisham's town, district and local centres, including where appropriate residential development, will be encouraged. GHL welcomes the Council's reference to diversification and highlights the important role that mixed-use development will perform in the evolution of Lee Green District Centre, including the role of complementary uses in securing the vitality of the centre. These complementary uses, and other main town centre uses, will perform a key role in responding swiftly to the changing economic climate and occupier demands, ensuring the long-term vitality and viability of Lee Green District Centre.		
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 13	*EC13* 11.17Policy EC13 should be redrafted so that it does not apply to site allocations. 11.18Policy EC13 'Optimising the use of town centre land and floorspace' (B) advises that proposals for new mixed-use development, including development involving the expansion, reuse or reconfiguration of existing floorspace will be considered having regard to a number of criteria. This includes the role and function of the centre, and the impact on town centre vitality and viability. The thrust of this policy is inconsistent with Government advice which recognises the need for greater flexibility in the reuse of town centre floorspace. It is also inconsistent with NPPF paragraph 86 (sequential test) and 89 (retail impact) which omits proposals which are in accordance with an up-to-date local plan. Part (B) should not apply to site allocations. 11.19Part (C) appears overly restrictive and inflexible. National policy recognises that residential development often plays an important role in ensuring the vitality of centres, and residential development should be encouraged. Residential development should be encouraged to enhance the vitality and viability of town centres. 11.20Within this context, we believe that draft Policy EC13 is not justified, effective or consistent with national policy, and EC13B should be deleted and re-drafted.	11.17 Disagree 11.18 The plan provides sufficient flexibility for town centres and proposals will be assessed through the Development Management process on a site by site basis with reference to the relevant policies and site allocations. 11.19 Disagree 11.20 Disagree. We are confident that the policy is in line with national policy and provides sufficient flexibility for our town centres.	No change
Barratt London and the Church Commissioners (Avison Young obo)	2	EC 14	*Relates to Part 3, LCA SA 20* **Draft Policy EC14 Major and District Centres** Part G of Draft Policy E14 resists residential units at ground floor level within town centres. Whilst we are supportive of the aspiration to create active frontages at ground levels within new development blocks, we highlight that such activation should not solely be delivered through ground level retail and/or commercial floorspace. Indeed, this could also be achieved through delivering a residential use at ground level which is complementary to other uses and may be the most suitable use to be brought forward in certain instances. We, therefore, request that Part G of this policy be amended to set out that the acceptability of ground floor residential use would be based on an assessment and consideration of site-specific circumstances.	Noted.	Policy EC14 amended to clarify that in major and district centres positive frontages should be delivered in the wider town centre area, with active ground floor frontages in the Primary Shopping Area.
GHL (Leegate) Limited	2	EC 14	*Relates to Part 3, LEA SA 03* Policy EC14 (Major and District Centres) states that proposals for residential units on the ground floor level or below, both within Primary Shopping Areas and the	Disagree, it is appropriate to designate the majority of Leegate	policy EC 14 has been amended to clarify that retail use only

(Frank Knight obo)			wider town centre area, are inappropriate and will be strongly resisted. Annex 2 Proposed Changes to the adopted Policies Map Document (December 2020) shows that the Lewisham Local Plan Review proposes to change and increase the area of the Primary Shopping Area to include the majority of the Leegate Shopping Centre regeneration site. GHL welcomes the continued emphasis placed on Lewisham's town, district and local centres as the focus for future development within the borough. However, it is strongly contended that the area proposed to be allocated as a Primary Shopping Area within the Site is not justified. The increased area covers a number of existing non-retail, commercial and community uses. Therefore, the primary shopping area boundary should be amended to cover areas where retail development is and should be directed. Furthermore, GHL does not agree that residential units should be resisted at ground floor in the Primary Shopping Area and wider town centre area. Residential development performs an important role in securing the long-term viability and vitality of a town centre, by increasing its permanent population. The delivery of housing alongside town centre uses needs to be considered on a site-by-site basis, as to appropriate level of integration. As such, GHL respectfully requests that the proposed Primary Shopping Area boundary is amended to remove the areas at the Site which are not currently in retail use and that proposed Policy EC14 removes the overly restrictive policy requirement for the Primary Shopping Area and wider town centre area to allow sufficient flexibility and to ensure residential development is supported, enabling appropriate integration.	District Centre as a Primary Shopping Area for the following reasons: • The town centre is currently comprised of retail mostly. • Leegate town centre is planned for comprehensive regeneration. • There is no master plan for the town centre at present.	relates to ground floor level as well as providing greater flexibility through applying a 50% threshold with regards to retail use. An updated retail study has informed this policy approach
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 14	*EC14* 11.21Policy EC14 'Major and District Centres' establishes policies for the Primary Shopping Areas, the locations where retail uses are concentrated. Part (C) seeks to ensure that in Lewisham major town centre, development proposals should ensure that *Class A1* (retail) uses in Primary Shopping Areas are maintained at a minimum of 50 per cent, as a proportion of all units. The policy sets out 6 exceptions to this. We would welcome clarification from the Council that this relates to ground floor units and / or floorspace. This part of the policy will also require revision to refer to the Government's Use Classes Order revision (Class E Commercial, Business and Service uses) which should replace reference to Class A1. 11.22Part (G) of the policy stipulates that proposals for residential units on the ground floor level or below, both within the Primary Shopping Areas and the wider town centre area, are inappropriate and will be strongly resisted. Such an approach provides little flexibility in the reuse or redevelopment of underutilised or vacant floorspace, is inconsistent with the position now being adopted by Government, and the NPPF. We therefore recommend that Criterion G is removed, or excludes strategic development coming forward as part of a site allocation.	Noted	policy amended to clarify that retail use only relates to ground floor level and provides greater flexibility by applying a 50% threshold with regards to retail use, which has been informed by an updated retail study
Tetra Tech Planning (John Lyon's Charity obo)	2	EC 16	Policy EC16 should also clarify that the loss of Class A1 retail uses would also be accepted where this is supported by a Site Allocation.	Noted. The Local Plan will be amended to reflect changes to planning legislation, which provide	Local Plan amended to reflect and respond to changes to the Use Class

				more flexibility for changes between Class E uses. Site allocations make provision for appropriate main town centre uses.	Order, including the new Class E.
McDonald's Restaurants Ltd (Planware Ltd obo)	2	EC 17	**Planware Ltd on behalf of McDonald's Restaurants Ltd** **Objection Response to Lewisham Local Plan Main Issues and Preferred Approaches Jan 2021** **Policy EC17 – Concentration of uses** 1 Introduction 1.1 We have considered proposed Policy EC17 Concentration of uses – with regard to the principles set out within the Framework. We fully support the policy's aim of promoting healthier living and tackling obesity. However, the proposed policy approach is unsound and fails to provide an evidence-based way of achieving the policy's objective. It has also been found unsound by several planning inspectors. It is too restrictive and prevents local planning authorities from pursuing more positive policy approaches. The London Borough of Waltham Forest has had such a policy in place for over a decade and its application has proven ineffective in tackling obesity to date. 1.2 Within these broad points we have the following policy objections to draft Policy EC17: A. The 400m exclusion zone is inconsistent with national planning policy B. The policy is inconsistent, discriminatory and disproportionate. C. Examination of other plans have found similar policy approaches to be unsound. D. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework. 1.3 1.3 In summary, Planware Ltd consider there is no sound justification for a policy such as Policy EC17, which imposes a blanket ban on restaurants that include an element of hot food takeaway "located at least 400 metres away from the boundary of a primary or secondary school". However, as stated in the opening paragraph, Planware Ltd supports the aim of promoting healthier living and tackling the obesity crisis. We acknowledge that planning can have a role in furthering these objectives. We would therefore welcome and support any studies between obesity and their relationship with development proposals, including examination of how new development can best support healthier lifestyles and tackling the obesity crisis. When a cogent evidence base has been assembled, this can then inform any appropriate policy response. This has still not emerged. 1.5 Given the lack of any clear agreement between experts on the indices of obesity or poor health, analysing the evidence is a necessary part of this objection by way of background. This will all be highlighted in the below text. 2 Contribution of McDonald's UK to the United Kingdom 2.1 This section of the objection sets out some background context relating to McDonald's own business, its contribution to United Kingdom, and information	Noted. The 400m exclusion away from primary and secondary schools is established by the London Plan policy E9. The additional local thresholds in town and local centres are established by the Council's adopted Development Management DPD, which are proposed to be carried over into the Local Plan. The Council considers there is sufficient evidence to merit retaining the policy.	Local Plan amended to refer to 400m exclusion zone from entrances and exits of existing or proposed primary or secondary school (rather than boundary) in accordance with the London Plan.

			on the nutritional value and healthy options of the food that it offers in its restaurants. This evidence is relevant to understanding the adverse and unjustified impacts of the blanket ban approach proposed under draft Policy EC17. Economic and Environmental Benefits 2.2 The first store in the United Kingdom was first opened in 1974 in Woolwich, London. The store is still opened and was interestingly the 3,000th store across the world. 2.3 With over 36,000 McDonald's worldwide, it operates in over 100 countries and territories. Approximately 120,000 people are employed by McDonald's UK, compared to just over 1 million employees worldwide. 2.4 McDonald's and its franchisees have become important members of communities in the United Kingdom: investing in skills and developing our people, supporting local causes and getting kids into football. 2.5 Nationally, the company operates from over 1,300 restaurants in the UK. Over 80% of restaurants are operated as local businesses by franchisees, that's around 1,100 franchised restaurants. 2.6 McDonald's is one of few global businesses that continues to anchor itself in high streets and town centres across the United Kingdom. Not just serving the general public but creating jobs and seeking to improve the communities around them. 2.7 All McDonald's restaurants conduct litter picks covering an area of at least 100 metres around the site, at least three times a day, picking up all litter, not just McDonald's packaging. 2.8 McDonald's is a founding member of the anti-littering campaign, Love Where You Live. As part of this, our restaurants regularly organise local community litter picks. The campaign has grown and in 2017, 430 events took place across the UK with around 10,000 volunteers involved. Since the campaign started, 2,600 events have taken place with around 80,000 volunteers involved. 2.9 McDonald's restaurants are operated sustainably. For example, their non-franchised restaurants use 100% renewable energy, combining wind and solar and use 100% LED lighting which means we use 50% less energy than fluorescent lighting. All of their used cooking oil is converted into biodiesel for use by delivery lorries. Their entire fleet of lorries runs on biodiesel, 40% of which comes from McDonald's cooking oil. This creates over 7,500 tonnes fewer CO2 emissions than ultra-low sulphur diesel. 2.10 All new McDonald's restaurants in the United Kingdom are fully accessible and we are working toward delivering this same standard for all existing restaurants.		

			2.11 McDonald's restaurants provide a safe, warm and brightly lit space for people, especially those who may feel vulnerable or threatened waiting for a taxi or outside. 2.12 Many of their toilets are open to all members of the public. They are one of few night time premises that offer this service and given the fact restaurants are located in some of the busiest parts of the country, McDonald's are helping to keep the United Kingdom cleaner. Nutritional Value of Food and Healthy Options 2.13 McDonald's offers a wide range of different food at its restaurants. 2.14 Nutritional information is easy to access and made available online, and at the point of sale on advertising boards, as well as in tray inserts. Information is given on calorie content and key nutritional aspects such as salt, fat and sugar content. This enables an individual is able to identify and purchase food items and combinations that fit in with their individualised calorie or nutritional requirements. 2.15 The menu offer includes a range of lower calorie options. 2.16 The restaurants now suggest meal bundles to assist customers in making informed, healthier choices. McDonald's have suggested "favourites" meal bundles, across the breakfast and main menu that enable the choice of low-calorie options to be made even more easily. These 3-piece meal combinations will all be under 400kcals on the breakfast menu, and all under 600kcals on the main menu (with many options under 400kcals on the main menu also), and all individual items on these menu bundles with be either green (low) or amber (medium) on the Food Standards Agency traffic light system for food labelling. 2.17 Examples of low calorie (less than 400kcals) breakfast options (where no single item is red for FSA) include any combination of the following: • Egg & Cheese McMuffin / Egg & cheese snack wrap / bagel with Philadelphia / porridge; with fruit bag; and a medium black coffee, or espresso or regular tea or water. 2.18 Examples of low calorie (less than 600kcals) main menu options (where no single item is red for FSA) are included in the table below. Some 90% of our standard menu is under 500 calories. *LB Lewisham officer note: a table is included in the original representation. It shows a range of lower calorie options for main meal, side options and drinks.* 2.19 Those specifically wanting a meal low in either fat, salt, or sugar, can tailor their choices accordingly. Any combination of menu items sold at McDonald's can be eaten as part of a calorie controlled nutritionally balanced diet. Customers alternatively eat anything from the menu allowing for this within their overall daily, or weekly nutritional requirements. Quality of Ingredients and Cooking Methods		

			2.20 McDonald's are always transparent about both their ingredients and their processes and strive to achieve quality. Their chicken nuggets are made from 100% chicken breast meat, burgers are made from whole cuts of British and Irish beef. Coffee is fair trade and their milk is organic. McDonald's want their customers to be assured about what they are consuming. The 'Good to Know' section on our website - *https://www.mcdonalds.com/gb/en-gb/good-to-know/about-our-food.html* - provides a range of information about their processes and where produce is sourced from. Menu Improvement and Reformulation 2.21 McDonald's is actively and continuously engaged in menu reformulation to give customers a range of healthier options. Louise Hickmott, Head of Nutrition, at McDonald's UK, has provided a letter giving examples of the steps that have been taken in recent years. The information is summarised below. 2.22 In recent years McDonald's has made great efforts to reduce fat, salt and sugar content across their menu. • 89% of their core food and drink menu now contains less than 500 kcals. • Supersize options were removed from their menu in 2004; • 72% of the Happy Meal menus are classified as not high in fat, salt or sugar according to the Government's nutrient profile model; • Since October 2015, 50% of the options on the drinks fountain have been no added sugar (Diet Coke, Coke Zero and Sprite Z); • Recent years have seen the introduction of new items, offering more choice that has included porridge, salads, grilled chicken wraps, carrot sticks, fruit bags including apple and grape, pineapple sticks, and melon chunks, as well as orange juice, mineral water and organic semi-skimmed milk; • Customers can swap fries for fruit bags, carrot sticks or shake salad on the main menu, or the hashbrown for a fruit bag or carrot sticks on the breakfast menu, at no additional cost; • In 2014, McDonald's introduced "Free Fruit Fridays" resulting in 3.7 million portions of fruit being handed out. Since then, discounted fruit is now available with every Happy Meal. Fat 2.23 A recent meta-analysis and systematic review of 72 studies (45 cohort studies and 27 controlled trials) demonstrated that with the exception of Trans Fatty Acids (TFA), which are associated with increased coronary disease risk, there was no evidence to suggest that saturated fat increases the risk of coronary disease, or that polyunsaturated fats have a cardio-protective effect, which is in contrast to current dietary recommendations (Chowdrey et al, 2014). 2.24 However, UK guidelines currently remain unchanged; men should consume no more than 30g of saturated fat per day, and women no more than 20g per day (NHS Choices, 2013). It should be remembered that all fats are calorie dense (9kcal/g) and that eating too much of it will increase the likelihood of weight gain and therefore obesity, indirectly increasing the risk of coronary heart disease, among other co-morbidities. 2.25 What have McDonald's done?		

			• Reduced the saturated fat content of the cooking oil by 83%; • Signed up to the Trans Fats pledge as part of the Government's "Responsibility Deal"; • The cooking oil has been formulated to form a blend of rapeseed and sunflower oils to reduce levels of TFA to the lowest level possible; • They have completely removed hydrogenated fats from the vegetable oils; • Reduced the total fat in the milkshakes by 32% per serving since 2010; • Organic semi-skimmed milk is used in tea/coffee beverages and in Happy Meal milk bottles, with lower saturated fat levels compared with full fat variants. ***Sugar*** 2.26 Dietary carbohydrates include sugars, starches and fibre, and each has approximately 4kcals/g. 2.27 The Scientific Advisory Commission on Nutrition (SACN) currently recommends that approximately 50% of total dietary energy intake should be from carbohydrates (SACN Report, 2015). In 2015 SACN recommended that the dietary reference value for fibre intake in adults be increased to 30g/day (proportionally lower in children) and that the average intake of "free sugars" (what used to be referred to as non-milk extrinsic sugars) should not exceed 5% of total dietary energy, which was in keeping with the World Health Organisation (WHO) recommendations. 2.28 Current average intake of free sugars far exceeds current recommendations, and excess intake is associated with dental issues and excess calorie intake which can lead to weight gain and obesity. 2.29 Over the last 10 years our reformulation work has resulted in 787 tonnes less sugar across our menu in 2017 versus 2007. What have McDonald's done? • Reducing the sugar in our promotional buns, this removed 0.6 tonnes of sugar. • Their Sweet Chilli Sauce has been reformulated to reduce sugar by 14% this equates to 155 tonnes of sugar removed • Their Festive Dip has removed 4 tonnes of sugar • Their famous McChicken Sandwich Sauce has reduced in sugar 45% • Their Tomato Ketchup has reduced in sugar by 20% which equates to 544 tonnes of sugar removed from the system • Their Chucky Salsa has reduced in sugar by 28% • Since 2016 they have reduced the sugar content of Fanta by 54% • The Toffee Syrup in their Toffee Latte has been reformulated to remove 20% of the sugar • McDonald's have also reformulated their Frozen Strawberry Lemonade this has led to 8% sugar reduction per drink Salt 2.30 A number of health-related conditions are caused by, or exacerbated by, a high salt diet. The strongest evidence links high salt intake to hypertension, stroke and heart disease, although it is also linked with kidney disease, obesity and stomach cancer (Action on Salt website).		

			2.31 Salt is often added to food for either taste or as a preservative, and in small quantities it can be useful. Adults in the UK are advised not to exceed 6g of salt per day, but the average intake at a population level is consistently higher than this. 2.32 Salt does not directly lead to obesity; however, it does lead to increased thirst, and not everyone drinks water or calorie-free "diet" beverages. If our thirst increases and leads to increased consumption of calories from extra fluid intake, then this may lead to increased weight and obesity. 31% of fluid drunk by 4-18-year-old children is sugary soft drinks (He FJ et al, 2008), which has been shown to be related to childhood obesity (Ludwig DS et al, 2001). 2.33 What have McDonald's done? • The salt content across the UK menu has been reduced by nearly 35% since 2005; • Customers can ask for their fries to be unsalted; • The salt added to a medium portion of fries has been reduced by 17% since 2003; • The average Happy Meal now contains 19% less salt than in 2006 • Chicken McNuggets contain 52% less salt than in 2003. 2.34 The process continues. McDonald's have recently made the following changes to further improve their menu • Making water the default drink in the Happy Meals; • Making it easier for people to understand the existence of a wide range of under 400 and 600 calorie meal options that are available. Third Party Opinions of McDonald's 2.35 McDonald's regularly receive supportive comments from independent third parties. 2.36 Professor Chris Elliott, of the Department for Environment, Food & Rural Affairs' independent Elliott Review into the integrity and assurance of food supply networks: interim report, December 2013: *"Each supply chain is unique, showing that there is no single approach to assuring supply chain integrity. The review has seen many examples of good industry practice that give cause for optimism. There is not space within this final report to reference all the good industry practices but those that have stood out include McDonald's and Morrisons."* 2.37 Jamie Oliver, the TV chef, food writer and campaigner speaking in January 2016 at the Andre Simon Food & Drink Book Awards to the Press Association: *"Everyone always liked to poke at McDonald's. McDonald's has been doing more than most mid and small-sized businesses for the last 10 years. Fact. But no one wants to talk about it. And I don't work for them. I'm just saying they've been doing it - 100% organic milk, free range eggs, looking at their British and Irish beef."*		

			2.38 Raymond Blanc, the TV chef and food writer, speaking in 2014, after having presented McDonald's UK with the Sustainable Restaurant Association's Sustainability Hero award: *"I was amazed. All their eggs are free-range; all their pork is free-range; all their beef is free-range.* *"[They show that] the fast-food business could change for the better. They're supporting thousands of British farms and saving energy and waste by doing so.* *"I was as excited as if you had told me there were 20 new three-star Michelin restaurants in London or Manchester."* 2.39 Marco Pierre White, TV chef and food writer, speaking in 2007: *"McDonald's offers better food than most restaurants and the general criticism of the company is very unfair. "Their eggs are free range and the beef is from Ireland, but you never hear about that. You have to look at whether restaurants offer value for money, and they offer excellent value."* These comments below represent independent opinions. ***Supporting Active and Healthy Lifestyles among Employees and Local Communities*** 2.40 McDonald's is focused on its people and is proud to have been recognised for being a great employer. For example: • Great Place to Work 2017 'Best Workplaces' – McDonald's are ranked 4th on the Great Place to Work 2017 'Best Workplaces' list (large organisation). This is our 11th year on the list. • The Sunday Times Best Company to Work for List 2017 - we have made The Sunday Times 30 Best Big Companies to Work for list for the seventh consecutive year, achieving 6th position. • Workingmums.co.uk Employer Awards 2017- Innovation in Flexible Working - in November 2017, we were awarded the Top Employer for Innovation in Flexible Working by workingmums.co.uk. The judges specifically recognised our approach to Guaranteed Hours contracts. • The Times Top 100 Graduate Employers - the Times Top 100 Graduate Employers is the definitive annual guide to Britain's most sought after employers of graduates. • Investors in People Gold - Investors in People accreditation means we join a community of over 15,000 organisations across 75 countries worldwide and it is recognised as the sign of a great employer. • School leavers Top 100 Employees - McDonald's UK has been certified as one of Britain's most popular employers for school leavers in 2017, for the third consecutive year. An award voted for by 15-18 year olds in the UK. 2.41 In April 2017, McDonald's began to offer employees the choice between flexible or fixed contracts with minimum guaranteed hours. This followed trials in 23 restaurants across the country in a combination of company owned and franchised restaurants. All of their employees have been offered this choice and around 80% have selected to stay on flexible contracts. 2.42 Over the past 15 years, McDonald's has been proud partners with the four UK football associations: The English Football Association; The Scottish Football Association; The Football Association of Wales; and The Irish Football Association.		

			2.43 This partnership has seen them support over one million players and volunteers. In London since 2014, more than 1,000 people have attended their Community Football Days and have distributed 3,328 kits to accredited teams in the Capital. Of the 171 McDonald's restaurants within the M25, approximately 88 are twinned and actively supporting a local football club. This serves as an example of the company's willingness to confront the obesity crisis by a multitude of different approaches. 2.44 McDonald's do this work because increasing standards will ultimately create a better experience for young footballers, leading to increased participation and retention of children and young people in sport. 2.45 Their Community Football programme helps to increase participation at all levels. McDonald's remain absolutely committed to it and are in the final stages of planning a new programme for future years. Marketing 2.46 As a business, McDonald's are committed to ensuring their marketing will continue to be responsible and will be used as a positive influence to help our customers make more informed choices. 2.47 McDonald's recognise that marketing has a part to play in influencing customers' choices. They comply, and go beyond, the UK's stringent regulations on marketing to children and use their marketing to help families understand more about the range of food options they have to offer. 2.48 McDonald's never market products classified as high in fat, salt or sugar to children in any media channel, at any time of the day. They are committed to ensuring that marketing is always responsible as well as informative, and that it reinforces positive food messages. 2.49 In addition, they go beyond the regulations in a lot of cases. For example, when advertising a Happy Meal, they only ever do so with items such as carrot sticks, a fruit bag, milk or water to ensure McDonald's are not marketing HFSS food to children. This has been done voluntarily since 2007. Summary 2.50 In the light of the above it is clear that McDonald's restaurants offer the district considerable and substantial economic benefits, are supportive of active and healthy lifestyles. They also enable customers to make informed, healthy decisions from the wide-ranging menu options available. It is important that this is acknowledged, given the assumption in proposed Policy EC17, that all hot food takeaways uses should fall under a blanket ban if within 400m of the boundary of a primary or secondary school. Given the policy aim – which McDonald's supports – of promoting healthier lifestyles and tackling obesity, other alternatives would be more effective than allowing blanket bans in school areas, which in turn will have negative land use consequences. We turn now to the main points of the objection.		

			3 The 400m Exclusion Zone is Inconsistent with National Policy Introduction 3.1 This section of the objection considers the proposed policy against national policy. The lack of evidence to support the policy is also discussed in the next section. 3.2 National policy contains no support for a policy approach containing a blanket ban or exclusion zone for hot food takeaways (or indeed any other) uses. Such an approach conflicts sharply with central planks of Government policy such as the need to plan positively and support economic development, and the sequential approach that seeks to steer town centre uses – which include hot food takeaways - to town centres. 3.3 Planware Ltd feel that restricting hot food takeaways within 400m of the boundary of a primary or secondary school is in direct conflict with the framework as the approach is not positive, justified, effective or consistent. The policy, as currently worded, provides no flexibility in accordance with town centre sites, thus conflicting with the sequential approach. These points are further explained in this objection. ***Practical Impacts*** 3.4 The practical impacts on a 400m exclusion zone from the boundary of a local primary or secondary school would have unacceptable negative land use consequences. 3.5 Consideration should be given to school rules in terms of allowing children outside of the school grounds at lunch times. This is overly restrictive on secondary schools, where a some of pupils will be legally classed as an adult and have access to a car. Additionally, primary school children are unlikely to be unsupervised before and after school and do not have access outside of school at lunchtimes. 3.6 No consideration is given to how the 400m is measured from the boundary. Guidance should be provided as to whether this is a straight line or walking distance, as this can vary greatly. 3.7 The Framework does not support the use of planning as a tool to limit people's dietary choices. In addition to this, other E class uses can provide unhealthy products, therefore, there is limited justification for the proposed Policy EC17 to focus exclusively upon hot food takeaways. ***Conflict with National Policy*** 3.8 The local policy team do not appear to have fully assessed the potential impact of the policy. It essentially creates a moratorium against hot food takeaways uses leaving limited reasonable space for them to locate. 3.9 Restricting the location of new hot food takeaway proposals through a 400m exclusion zone is not a positive approach to planning, thus failing to comply with the Framework.		

			3.10 The suggested restriction within proposed Policy EC17, takes an ambiguous view of hot food takeaways in relation to the proximity to all primary and secondary schools. The policy would apply an over-generic approach to restrict hot food takeaway development with little sound planning reasoning or planning justification. This is contrary to paragraph 11 of the Framework that advises authorities to positively seek opportunities to meet development needs of their area. 3.11 Thus, is consistent with paragraph 80-81 of the Framework. 3.12 Para 80 states: *"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future."* 3.13 Para 81 states: Planning policies should: *"a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;* *b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;* *c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and* *d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances."* 3.14 As explained in this objection, there is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. The need for evidence is emphasised in paragraph 31 of the Framework that states that each local plan should be based on adequate, up-to-date and relevant evidence. Neither the policy nor the supporting text address this point. Policy needs to be based on evidence and the lack of evidence should highlight a red flag concerning the draft policy. 3.15 The policy is likely to be damaging to the district's economy due to the fact that it is restricting hot food takeaways to an unprecedented level without regard to the local area or the economy. 3.16 The Framework cannot be interpreted to provide generic restrictions on a particular use class. There is no basis for such a blanket ban approach in the Framework or Planning Practice Guidance. In fact, the Planning Practice Guidance emphasises that planning authorities should look at the specifics of a particular proposal and seek to promote opportunity rather than impose blanket restrictions on particular kinds of development. In the section on "Health and Wellbeing":		

			3.17 Paragraph: 002 (Reference ID: 53-002-20140306) states that in making plans local planning authorities should ensure that: *"opportunities for healthy lifestyles have been considered (eg. planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation);"* 3.18 Paragraph: 006 (Reference ID: 53-006-20170728) says that a range of criteria should be considered, including not just proximity to schools but also wider impacts. It does not support a blanket exclusion zone. Importantly, the criteria listed are introduced by the earlier text which states: *"Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices."* 3.19 The above guidance serves to emphasise why it is important to look at particular proposals as a whole, rather than adopting a blunt approach that treats all proposals that include a Sui Generis use as being identical 4. The Policy is Inconsistent, Discriminatory and Disproportionate 4.1 The policy aims to address obesity and unhealthy eating but instead simply restricts new development that comprises an element of Sui Generis use. Yet Class E retail outlets and food and drink uses can also sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables, and hot food from a restaurant unit can be delivered to a wide range of locations, including schools. This means that the policy takes an inconsistent approach towards new development that sells food and discriminates against operations with an Sui Generis use. It also means that the policy has a disproportionate effect on operations with an Sui Generis use. 4.2 The test of soundness requires that the policy approach is "justified", which in turn means that it should be the most appropriate strategy when considered against the reasonable alternatives and based on proportionate evidence (paragraph 35 of the Framework). 4.3 Given the objectives of the policy, it ought to apply equally to all relevant food retailers. It is unclear how the policy would be implemented and work in a real life scenario. 4.4 The table below shows the kind of high calorie, low nutritional value food that can be purchased from a typical A1 high street retailer at relatively low cost. It is contrasted with the kind of purchase that could be made at a McDonald's. *LB Lewisham officer note: a table is included in the original representation. It shows high calorie food that can be purchased at a high street retailer.*		

			LB Lewisham officer note: Appendix 1 Food in the School Fringe Tends to be Purchased in Non-Hot Food Takeaway Properties is included in the original representation. It provides evidence that confirms that 70% of purchases by students in the school fringe were not purchased in a hot food takeaway. 4.5 If the policy is to be based on Use Classes, then the proposed policy should place restrictions on other use classes in addition to hot food takeaways. In fact, by restricting hot food takeaway uses only, the policy would encourage food purchases at other locations and allows for the overarching objectives to be compromised. 4.6 Finally, it is important that for the majority of days in the year (weekends and school holidays combined) schools are not open at all. Research by Professor Peter Dolton of Royal Holloway College states that "At least 50% of the days in a year kids don't go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school." 4.7 For the minority of the year when schools are open, it is important to recognise that many schools have rules preventing children from leaving the school grounds during the school day, and in any event proximity to schools has no conceivable relevance outside of the particular times when children are travelling to or from school in circumstances where their route takes them past the development proposal. 4.8 The policy's blanket approach fails to acknowledge that the opportunity for children to access hot food takeaways, as part of a school day, is extremely limited. The complete ban is wholly disproportionate to the circumstances when the concern underlying the policy might become a more prominent matter. *LB Lewisham officer note: Appendix 2 Food Purchases made on School Journeys is included in the original representation. It shows that limited purchases of food are made at hot food takeaways on journeys to and from school.* 5 The Policy is not Justified because of a Lack of an Evidence Base 5.1 The test of soundness requires policy to be evidence based. There is no evidence of any causal link between the presence of hot food takeaways within 400m of the boundary of a local primary or secondary school. Also, with no basis to indicate over-concentrated areas gives rise to obesity or poor health outcomes, justification is evidently incomplete. In fact, the studies that have considered whether such a causal connection exists [between proximity of a hot food takeaway and poor health outcomes], have found none. 5.2 Public Health England (PHE), which is part of the Department of Health and Social Case, expressly accept that the argument for the value of restricting the growth in fast food outlets is only "theoretical" based on the "unavoidable lack of evidence that can demonstrate a causal link between actions and outcomes."		

			5.3 A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation 'did not find strong evidence at this time to justify policies related to regulating the food environments around schools.' It instead highlighted the need to 'develop a higher quality evidence base'. 5.4 The range of US and UK studies used to support many beliefs about obesity, including the belief that the availability of fast food outlets increased obesity, was comprehensively reviewed in papers co-written by 19 leading scientists in the field of nutrition, public health, obesity and medicine. Their paper "Weighing the Evidence of Common Beliefs in Obesity Research" (published in the Critical Review of Food, Science and Nutrition (Crit Rev Food Sci Nutr. 2015 December 6; 55(14) 2014-2053) found that the current scientific evidence did not support the contention that the lack of fresh food outlets or the increased number of takeaway outlets caused increase obesity (see pp16-17 of the report). 5.5 There appears to have been no critical assessment of whether the underlying evidence supports the proposed policy approach. 5.6 In this context, it is important to consider the evidence from the Borough of Waltham Forest, which introduced a school proximity policy in 2008 – about a decade ago. Over that period, the Public Health England data for the borough shows that there has been no discernible impact on childhood obesity rates – with these worsening in recent years. The borough's Health Profile for 2017 records childhood obesity (year 6) at 26.1% up from 20.3% in 2012, the year London hosted the Olympic Games. 5.7 While it is accepted that the causes of obesity are complex, it is clear that the school exclusion zone policy had no discernible effect in Waltham Forest. More research and investigation is needed before such a policy approach can be justified by evidence. 6 Similar Policies Have Been Found Unsound When Promoted in Other Plans 6.1 The lack of evidence between proximity of takeaways to local schools and its impact on obesity has been confirmed in a number of planning decisions. 6.2 In South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating 'the evidence base does not adequately justify the need for such a policy', and due to the lack of information, it is impossible to 'assess their likely impact on the town, district or local centres'. 6.3 Similarly, research by Brighton & Hove concluded that 'the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day'. 6.4 The recent Inspectors response to the London Borough of Croydon (January 2018) regarding a similar prohibition on hot food takeaways, (where a similar campaign to persuade takeaway proprietors to adopt healthy food options		

			existed) confirmed that the councils own 'healthy' plans would be stymied by the proposed policy, as would purveyors of less healthy food. The policy failed to distinguish between healthy and unhealthy takeaway food, and "confounds its own efforts to improve healthiness of the food provided by takeaway outlets" and failed to "address the demand for the provision of convenience food". The Inspector concluded that because the reasons for the policy do not withstand scrutiny, they must be regarded as unsound. 6.5 The inspector at Nottingham City Council stated "*There is insufficient evidence to support the link between childhood obesity and the concentration or siting of A3, A4 and A5 uses within 400m of a secondary school to justify the criterion of policy LS1 that proposals for A3, A4 and A5 uses will not be supported outside established centres if they are located within 400m of a secondary school unless it can be clearly demonstrated that the proposal will not have a negative impact on health and well-being the criterion and justification should therefore be deleted/amended*". 6.6 The inspector at Rotherham stated "*Policy SP25 sets out various criteria against which proposals for hot food takeaways will be assessed. One of the criteria is designed to prevent hot food takeaways within 800 metres of a primary school, secondary school or college when the proposed site is outside a defined town, district or local centres. Having carefully considered the material before me and the discussion at the Hearing I do not consider there is sufficient local evidence to demonstrate a causal link between the proximity of hot food takeaways to schools and colleges and levels of childhood obesity. Although I accept that levels of childhood obesity need to be tackled by both local and national initiatives I do not consider there are sufficient grounds at the present time to include this particular aspect of land use policy in the RSPP*". 6.7 In Guildford, the inspector stated "*Finally, the submitted Plan contains a requirement common to Policy E7 Guildford town centre, E8 District Centres and E9 Local Centres and isolated retail units that resists proposals for new hot food takeaways within 500 metres of schools. However, the evidence indicates that childhood obesity in Guildford is lower than the average for England. Childhood obesity may be a product of a number of factors, not necessarily attributable to takeaway food; takeaways often sell salads as well as nutritious foods; not all kinds of takeaway food are bought by children; children have traditionally resorted to shops selling sweets and fizzy drinks, which would be untouched by the policy; and the policy would have no bearing on the many existing takeaways. In this context there is no evidence that the requirement would be effective in safeguarding or improving childhood health. It would be an inappropriate interference in the market without any supporting evidence and would therefore be unsound*". 6.8 The proposed 400m school exclusion zone and restriction of hot food takeaways developments in 'over-concentrated areas are two policies that we cannot agree to. The proposed approach is in direct conflict with the Framework. As mentioned in the above text, there is enough reputable information to demonstrate a current evidence base that fails to demonstrate the link between fast food and school proximity. There is also a clear absence of evidence to suggest restricting hot food takeaway use in 'over-concentrated' outside of town		

			and district centres will lead to healthier lifestyles or influence an individual's dietary choice. 7 Alternative Approaches 7.1 Planware Ltd considers there is no sound justification for point C of the proposed Policy EC17 which imposes commercial restrictions on restaurants that include an element of hot food takeaways within a 400m radius from a primary or secondary school. Point C should therefore be removed to provide consistency and to abide by the Framework. 7.2 Planware Ltd would welcome and support proposals for a wider study of the causes of obesity and their relationship with development proposals, including examination of how new development can best support healthy lifestyles and the tackling of obesity. When a cogent evidence base has been assembled, this can then inform an appropriate policy response. That time has not yet been reached. 7.3 It is considered until such a time has been reached, point C should be removed. 8 Conclusion 8.1 McDonald's supports the policy objective of promoting healthier lifestyles and tackling obesity. It does not consider that the proposed Policy EC17 is a sound way of achieving those objectives. The underlying assumption in the policy is that all hot food takeaways (and any restaurants with an element of takeaway use) are inherently harmful to health. In fact, this is not supported by evidence. McDonald's own business is an example of a restaurant operation which includes takeaway but which offers healthy meal options, transparent nutritional information to allow healthy choices, and quality food and food preparation. The business itself supports healthy life styles through the support given to its staff and support given to football in the communities which the restaurants serve. 8.2 In addition, the policy fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and wellbeing. McDonald's own business is an example of a restaurant operation that supports sustainable development through the use of renewable energy, the promotion of recycling, the use of energy and water saving devices. The economic benefits of its restaurants in supporting town centres and providing employment opportunities and training are substantial, and important given that improved economic circumstances can support improved health. 8.3 The policy fails to acknowledge that food choices which are high in calories and low in nutritional value are made at premises trading with Class E consents and can be delivered from the latter. The policy makes no attempt to control these uses. 8.4 For the reasons given in this objection the proposed policy is very clearly inconsistent with government policy on positive planning, on supporting economic development and the needs of businesses, on supporting town centres, and on the sequential approach. There is no justification in national		

			policy for such restrictions to be applied to hot food takeaways. The effect of the policy had it existed in the past would have been to exclude restaurants such as McDonald's from major commercial and tourist areas. 8.5 For the reasons given in this objection the proposed policy lacks a credible evidence base, and similar policies have been found to be unsound by inspectors who have examined other plans. In the one London Borough that has had a similar policy, concerning a school exclusion zone, for around a decade (LB Waltham Forest). It has had no discernible effect on obesity levels, which have in fact increased since its introduction. 8.6 Given the overall objective of improving lifestyles and lowering obesity levels, restrictive policy regarding hot food takeaway development is a narrow-sighted approach. There is no mention of other possible reasons behind the national high levels of obesity. To discriminate against hot food takeaways alone is worrying and using the planning system to influence people's daily lifestyle choices is not acceptable.		
Cockpit Arts (The Planning Lab obo)	2	EC 18	*Relates to Part 3, LNA SA 14* • CA is supportive of policy that recognises and seeks to protect and enhance creative and cultural uses within the borough. • We consider it vitally important to preserve and enhance the existing, distinctive cultural activities in Lewisham through *meaningful* designation of the Cultural Quarters. This represents an opportunity for Lewisham to retain and develop its rich cultural and creative identity, so much of which has been lost elsewhere in London; and support a meaningful legacy of its status as Borough of Culture 2022. • We strongly support the statement that "Cultural Quarters include Locally Significant Industrial Sites and it is vital that the functional integrity of the LSIS is secured and not compromised. • We endorse the protection the policy confers to creative (*not just*) arts-led institutions as development takes place around them and as they consider their own development.	Support noted.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	2 2	Chapter 06 EC 18 Chapter 08	**Part Two – Managing Development** **Do you agree with the broad topic areas proposed to be covered in Part 2: Managing Development?** Yes, the topic areas cover the key themes for any Local Authority in producing its Local Plan, however we consider that "Culture" should be dealt with alongside Heritage and not within the Economy topic. **Heritage** **Do you agree that the Local Plan has identified all of the issues around heritage?** A more comprehensive approach to Heritage would be to include those policies related to "Culture" (Policies EC18-EC22) within this topic area.	Noted. It is acknowledged that there is overlap within the plan and some policy topic areas are cross-cutting, such as culture. However it has been included in the EC chapter for organisational purposes. The Local Plan should be read as a whole.	No change.
GHL (Leegate) Limited (Frank Knight obo)	2	EC 19	*Relates to Part 3, LEA SA 03* Policy EC19 (Public houses) sets out a presumption in favour of the retention of public houses in Lewisham, consistent with London Plan Policy DC7 (Protecting public houses). The policy adds that development proposals involving the replacement or re-provision of a public house must ensure the replacement facility is of comparable character and quality as the existing public house and has an appropriate amount and configuration of floorspace to enable the continued viability of the public house. The supporting policy text states where	Noted. Disagree. The Council considers that evidence should be provided to demonstrate that options to retain the existing public house in-situ have been considered prior to proposing a replacement	No change.

			sites are redeveloped (including through comprehensive redevelopment), the priority is to retain pubs and keep them in situ. GHL recognises the need to protect public houses in London. However, it should be recognised that there will be instances where replacement or re-provision of a pub is necessary, and as long as the replacement facility is provided to ensure continued social, economic, or cultural viability and vitality will be retained, there should be no requirement to demonstrate that options have been considered to retain the pub in-situ. Clarification is sought on this approach.	facility. The policy is considered to provide sufficient flexibility to enable development to come forward where retention cannot be feasibly met.	
Tavern Propco (Savills obo)	2	EC 19	*Relates to Part 3, LSA SA 11* **Emerging Policy EC19: *Public Houses*** Emerging policy EC19 limits the loss of a public house that has heritage, economic, social or cultural value to the community, including through change of use or redevelopment, unless there is robust and authoritative evidence to demonstrate otherwise. Part A subsection (b) of this emerging policy requires redevelopment proposals to demonstrate that: *"The public house is not financially viable and there is no reasonable prospect of the premises remaining in this use, or an alternative community use, in the foreseeable future as evidenced through attempts at different business models and management, and an active marketing exercise of a minimum continuous period of three-years".* Tavern Propco is supportive of the Council's commitment to the protection and retention of public houses within Lewisham. However, it is considered that the restrictive and onerous nature of emerging Policy EC19 is incompatible with the post Covid-19 high street and viability of public houses. As the high street begins to recover from the effects of the Covid-19 Pandemic, the high street will go through a period of consolidation and rationalisation. This has already been seen, with some shops, retailers, restaurants and pubs not re-opening, or assessing their longer-term viability. As a result of the pandemic and the long period of closure, it is unfortunate that some pubs have already become or about to become unviable. Therefore, despite marketing attempts, the viable use of some pubs will never be achieved. Therefore, it is considered that the requirement for an active marketing exercise of three years is overly onerous and will leave pubs on the high street empty and falling into disrepair reducing the ability for certain pub sites to come forward for suitable redevelopment. **Requested Amendment:** Emerging Policy EC19 requires a minimum continuous marketing exercise of three years before an alternative use of the site can come forward. It may become apparent that another use of public house building could successfully and viably operate within these premises. In order to assist and accelerate the recovery of the High Street, it is requested that LBL amend Policy EC19 by removing the minimum marketing period for public houses of three years.	The Council considers that the marketing requirement whilst rigorous is proportionate given the policy objectives around the retention of public houses, evidence of loss of public houses over the years, and recognition they are community infrastructure in accordance with national planning policy.	No change.
Artworks Creekside (Avison Young obo)	2	EC 19	*Relates to Part 3, LNA SA 16* ***Draft Policy EC19 – Public houses*** Artworks Creekside has reviewed the draft Policy EC19 and notes that there is a presumption in favour of retention of public houses. The proposals retain the public house and any future planning application will be accompanied by robust	Noted. Disagree that Policy EC17.C should be deleted. However amendments will be made to ensure the policy regarding replacement facilities the	Local Plan policy EC17.C amended to make clear the focus is on high quality design and responding positively to local character.

			evidence on the viability of the current and future pub operation. The Birds Nest PH is a locally listed building – commentary is provided on the associated Policy elsewhere – and the Council's requirement to ensure that development does not detract from the character and appearance of the building is noted. Policy EC19.C is noted and the requirement to provide an appropriate amount and configuration of floorspace to enable the continued viability of the public house is supported. However, the requirement to ensure the replacement facility is of a comparable character and quality is questioned, given that such an assessment is a subjective judgement against which no measurement can be made in planning terms. It is suggested that this is omitted. The post-amble has been reviewed and it appears inconsistent with the policy requirements. The post-amble notes that '*proposals will be required to demonstrate that they have considered all reasonable options for retaining the pub in situ'*. This is not part of the Policy. Only the loss of public house through the change of use or redevelopment has this requirement. The post-amble should be revised accordingly. Artworks Creekside note the commentary about marketing evidence requirement that are expected to be appended to the Local Plan and suggest that this should be applied only where the public house use is being lost, and not where the public house is being re-provided.	focus is on high quality design rather or 'comparable character and quality'. This will address uncertainties and ambiguity around the implementation of the policy. Appendix amended to provide that flexibility on market requirements may be applied on a case by case basis.	
GHL (Leegate) Limited (Frank Knight obo)	2	EC 20	*Relates to Part 3, LEA SA 03* Lastly, Policy EC20 (Markets) remarks that development proposals should protect and seek to enhance existing markets and that all proposals for markets and market space must demonstrate that there will not be an unreasonable adverse impact on the amenity of adjoining and neighbouring properties, or have a detrimental effect on the functioning of the local road network. As much as GHL supports the principle of this policy, it is unclear as to what is defined as an `existing market'. If markets used to exist, but haven't done so for years, is there justification to re-provide a market. Clarification is sought on this approach.	Noted. Agreed that clarification will be useful.	Local Plan policy amended to clarify markets include those that are authorised or licenced for use.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 20	**Markets** 11.23Draft policy EC20 'Markets' seeks to protect and seek to enhance existing markets. Proposals for new markets or market space should be directed to appropriate town centre locations. Proposals for new development affecting existing markets within town centres will only be considered having regard to demonstrable demand and the impact on town centre vitality and viability. Landsec are supportive of this policy.	Support is noted.	No change.
The Renewal Group (Carney Sweeney obo)	2	EC10 – EC17	*Relates to Part 3, LNA SA 08* **Policies EC10 – EC17 Town Centre Policies** These policies need to be updated to have regard to the new Use Classes Order especially in relation to the new Use Class E and the imminent amended permitted development rights later this year. The Inspector considering the Westminster Local Plan in 2020 made clear the importance of this.	Noted.	Local Plan has been amended to accord with changes to the Use Classes Order and permitted development rights.
QUOD (Landsec obo - Lewisham Shopping Centre)	-	Retail Evidence Base	*LB Lewisham officer note: Chapter 5 of the submitted response provides an in-depth analysis of the retail capacity needs of Lewisham Town Centre and a review of the retail evidence base.*	Following the Regulation 18 Consultation, the Council and Litchfields has prepared a	Local Plan amended to take account of the changes arising in town centres from the new Use Class E.

			5.60 Although the Council published updated retail evidence in September 2019 (the LRCSU) to inform the Reg 18 Plan, there are substantial concerns regarding the robustness of the assessment undertaken. 5.61 The LRCSU relies on a household telephone survey undertaken in November 2015. Such survey evidence is over five years old and fails to provide an up-to-date understanding of existing shopping patterns in the local area, or a robust basis to understand future retail capacity requirements, including those being promoted in the Reg 18 Plan. Given the age of the survey evidence only limited weight can be given to the findings of the LRCSU. 5.62 Notwithstanding our concerns regarding the robustness of the survey evidence, the LRCSU relies on population and expenditure data published in 2015 and 2018 respectively. This data was published before the ongoing COVID-19 pandemic, which has accelerated the previously forecast fundamental shift in retailing, led largely by the growth of online shopping. 5.63 A simple update of the LRCSU demonstrates that applying the latest data now available, this substantially reduces the retail capacity for additional floorspace in Lewisham town centre, particularly for comparison goods. Indeed, this assessment identifies there to be an oversupply of retail floorspace in the Town Centre, together with a high level of vacant floorspace. 5.64 Central Government has recognised the need for flexibility due to the decline of the retail sector through the introduction of the new Class E use class, and proposals in respect of permitted development in relation to allowing the change of use from retail to residential without the need for planning permission. 5.65 The recognised shift in the retail sector has major implications for retail town centres, and one that should be reflected by local planning policy in order to ensure that the Council's approach to town centres is effective and justified. **Future Leisure Needs** 5.66 Whilst the LRCSU provided revised retail capacity figures, this did not provide an up-to-date assessment of future leisure needs. As such, the most up-to-date assessment of future retail needs remains the Lewisham Retail Capacity Study 2017. 5.67 The 2017 Study identified that there was an absence of a large multiplex cinema in the Borough, and that Lewisham town centre should be the focus for this (now proposed at Lewisham Gateway). The Study also concluded that Lewisham town centre is under provided for in terms of other commercial leisure uses, in particular the food and beverage ('F&B') sector. 5.68 Like the retail sector, the commercial leisure sector is also going through transitional change even before the impact of the COVID-19 pandemic. As such demand continues to be limited. **Office Development**	Retail Impact Assessment and Town Centre Trends Study in response to considerable feedback on the draft Local Plan (Regulation 18) document concerning future retail demand and the changing nature of town centres. The findings have fed into the Local Plan.	

			5.69 National planning policy requires local planning authorities to assess future need for office floorspace, which is also identified as a main town centre use. 5.70 The Reg 18 Plan (para, 2.16) identifies a requirement for up to 21,800 sqm (net) of additional employment (office) floorspace in the Borough by 2038. This floorspace requirement has been derived from the Lewisham Employment Land Study (March 2019) prepared by CAG Consultants. 5.71 Landsec would like to work with the Council to understand how this requirement has been affected by the COVID-19 pandemic, and its specific implications for Lewisham Town Centre.		
L&Q Group	2	Section 9	*Relates to Call for site* 4.2 Community Infrastructure L&Q is supportive of the flexible approach to delivering community infrastructure that is being proposed, which allows for both on-site provision and / or financial contributions where appropriate.	Support noted.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	2	Chapter 09	**Community Infrastructure** **Do you agree that the Local Plan has identified all of the issues around community infrastructure?** No comments.	Noted.	No change.
Albacore Meeting Room Trust (Lichfields obo)	- 2	Summary Document Cl 01	*Relates to Call for site* **Community Use Needs and Benefits** The Council's 'Summary Document' on Community Infrastructure1 indicates that LBL residents have voiced concerns via the local plan review process regarding the existing poor condition and possible closure of some older community facilities in Lewisham Borough as well as concerns regarding whether there will be sufficient community facilities (such as surgeries and schools) to meet extra demand as the borough grows. In the document, the Council recognises that Lewisham's projected population growth will create extra demands for community facilities and services (including education, health and social care), which will need to be managed. The Council intend to prepare an Infrastructure Delivery Plan to identify and monitor needs in the Borough and ensure these are provided in the right places and also intend to ensure the Borough's needs for such uses are met via making the best use of existing facilities but also via and securing and providing high quality new facilities. As part of this review and preparation of evidence base documents, the Council will need to consider appropriate and sustainable sites to meet identified needs. The Brethren Meeting Hall site is suitable and available to meet identified community needs and offer associated substantial benefits to the Local Community. It is also relevant to consider the GLA's Stage 12 report on the Citygate Church Application for demolition of the vacant place of worship and creation of new church space and associated development on the site. The GLA officers note the	The supplementary information is noted. Our response to the call for site for Brethren Meeting Hall is set out at the back end of this table.	No change

			proposed building to be materially larger than the existing building on the site given it seeks to increase the building footprint and height that is permitted (see table at paragraph 24 of the Stage 1 report). The assessment is therefore made in context of the proposal being inappropriate development within the MOL that requires demonstration of 'Very Special Circumstances'. However, sections of the GLA report are relevant to the 'Exceptional Circumstances' case for removing the Brethren Meeting Hall site from the MOL for community uses. The GLA supports the replacement and enhancement of social infrastructure on the site. Officers consider the key benefits of the Citygate proposal would be: provision of a secured connection for adjacent Sedgehill School children to the playing fields across the site to avoid travelling along the main road; the community use of the building; and, potential improvement to the MOL via enhancing soft landscaping on site. The GLA support the intention to provide for community uses on the site, in line with Policy S1 of the London Plan, and paragraph 5.1.11 which states that that voluntary and community groups often find it difficult to find premises suitable for their needs. In this context, the GLA ask for elements of the community use proposed, including availability for use by the adjacent school for large events and other community groups, to be secured by legal agreement in order to secure the benefit to the local community. In particular, the GLA support the part of Citygate's VSC case which identifies there to be a lack of alternate options available for the development (i.e. of this size, type and location). The GLA recognises Citygate's case that the community use cannot compete for other urban sites given the size of the site required for its purposes and the more competitive prices that urban land would generate for this community use. In their assessment, the GLA acknowledge that *"the existing site is vacant and available, and the proposed use would be policy compliant in land use terms for the site. The site is therefore of an appropriate scale and designation for the proposed use".* The GLA's comments also are positive with regard to the design and appearance of the proposed Citygate scheme, noting it to be an improvement from the existing Meeting Hall on the site, the Stage 1 report states: *"The design and appearance of the building has aimed to reduce its visual impact and a substantial portion of the floorspace would be below ground. Glass and transparent materials are also proposed, which would improve views into the site compared to the existing solid and derelict building… The visualisations and materials submitted demonstrate that the proposal will have an increased visual impact on the openness of the MOL. This harm has been minimised and mitigated by the applicant through reductions made to the size of the building, use of below ground structure, landscaping proposed and use of materials…"* This demonstrates that development of the Brethren Meeting Hall site to meet identified community infrastructure needs could be achieved with limited visual impact to the MOL.		
Albacore Meeting Room	2 2	CI 01 CI 02	*Relates to Call for site* **(c) Community Infrastructure: (CI1) Safeguarding and Securing Community**	Support noted. The comments regarding the site's development	No change.

Trust (Lichfields obo)			**Infrastructure and (CI2) New and Enhanced Community Infrastructure** The Trust supports LBL's intention to work collaboratively with Stakeholders to identify current and projected future requirements for community infrastructure including for healthcare, education, recreational and other community service needs in the Borough, and secure the necessary provision of this infrastructure (CI1 a). Identification of suitable and available sites should follow this assessment/evidence base, and subsequently appropriate sites, such as the Brethren site, should be allocated to meet identified needs. In particular, the Council's encouragement of innovative approaches to community infrastructure provision, "*including new models of community infrastructure provision (such as multi-use and shared use facilities, or co-location of uses)" (para 9.3)* is supported. This aligns with national policy as it will provide opportunities to make better use of land and assets.	contributing to this policy are noted.	
The Renewal Group (Carney Sweeney obo)	2	CI 01	*Relates to Part 3, LNA SA 08* **Policy CI1 Safeguarding and Securing Community Infrastructure** Firstly, this policy needs to make clear that it does not seek to protect short term meanwhile uses.	Policy CI1 does not need to refer to short term meanwhile uses as the Local Plan contains a specific policy that supports meanwhile uses, but only where it will be temporary in nature and will not preclude the future redevelopment of the site in question.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	CI 01	**12 Chapter 9-12 Community Infrastructure, Green Infrastructure, Sustainable Design & Infrastructure and Transport** **Community Infrastructure** 12.1 Chapter 9 contains key policies on Community Infrastructure focusing on ensuring that neighbourhoods are well supported with facilities and services; making the best use and securing facilities; and providing high quality facilities. 12.2 Community facilities and social infrastructure are critical for creating successful places and enabling new development. There is some uncertainty about future demographics in the borough and therefore the demand for community facilities, and in particular future schools' places, over the longer term is unclear. Landsec therefore supports the Councils' plan and monitor approach as set out in the Infrastructure Development Plan. 12.3 For large scale developments, the Council should ensure that policies can be sufficiently flexible to enable development, and recognise the practicalities requires of doing so, including the need for bespoke planning and agreement. 12.4 Policy CI1 'Safeguarding and securing community infrastructure' advises at part D that new development will be supported where it safeguards and enhances community infrastructure. In respect to the loss of an existing community facility, or land and buildings formerly in community use, it is unclear the reasoning behind the 12-month continuous marketing time period which has	Comment Noted	No change.

			not been justified in the Reg 18 Plan or its relevant evidence base (Draft Infrastructure Delivery Plan (November 2020)). 12.5 Part E advises that payment-in-lieu would only be acceptable where the existing or alternative community use is not viable. This should be decided on a case by case basis including consideration of the need (and recent use) for the facility and whether it is the best use of land.		
QUOD (Landsec obo - Lewisham Shopping Centre)	2	CI 02	12.6 Policy CI2 'New and enhanced community infrastructure' stipulates requirement for new infrastructure. Community infrastructure is sometimes planned to meet specific needs and / or with specific occupiers in mind, but at other times is planned with flexibility to meet future needs and therefore the occupiers are not yet known.	Comment noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	CI 03	12.7 Landsec welcomes Lewisham's intention to meet the London Plan Policy S4 'Play and Informal Recreation' requirement at Policy CI3 'Play and informal recreation' to incorporate well designed and high-quality formal play provision of at least 10 square metres per child. This is supported.	Support is noted.	No change.
L&Q Group	2	CI 03	*Relates to Call for site* Policy CI3 (Play and informal recreation) provides welcome guidance regarding the Council's expectations for the provision of children's play space, in accordance with the principles contained within the London Plan (2021). Part C of Policy CI3 states that all new play space and provision for informal recreation should be designed and managed with "unrestricted public access". This is not feasible where play space is provided within communal amenity space designed specifically for residents of the scheme, such as within a podium courtyard. If the play space within these spaces were required to be publicly accessible, this would raise concern from both a security, building management and maintenance perspective and is likely to significantly increase maintenance, and in turn service, charges. We suggest that "unrestricted public access" is removed from Policy CI3 C a) in respect to communal amenity spaces. For the avoidance of doubt, we recognise new play space in the public realm should be available for public access.	Noted.	Local Plan amended as suggested, to ensure that public access encouraged and not unreasonably restricted, in line with Secure by Design Principles.
Barratt London and the Church Commissioners (Avison Young obo)	2	CI 03	*Relates to Part 3, LCA SA 20* **Draft Policy CI3 Play and informal recreation** Barratt London and the Church Commissioners support the London Plan benchmark of 10 sqm per child as the standard sought by Draft Policy CI3. Part B of this Draft Policy refers to play space provision being made accessible to all children in the development irrespective of housing tenure. Part C then refers to play space having unrestricted public access. The current wording of these parts of the Draft Policy could give rise to security and management issues at occupation stage. Draft Policy QD2 is clear that development proposals must have regard to 'Secured by Design' principles, and we highlight that Part B and Part C of Draft Policy CI3 in their current form potentially conflict with this. As referred to previously, large developments which contain many blocks or uses are often owned and/or managed by different parties who may have individual security and management requirements. Of note, affordable housing provision is most often managed separately to the wider housing offer by an RP (which	Noted.	Local Plan amended as suggested, to ensure that public access encouraged and not unreasonably restricted, in line with Secure by Design principles.

			would likely wish to ensure its residents are not subject to service charges of areas which they rarely use). We, therefore, request that Part B of this policy be amended to seek play space provision being made accessible to all children 'where possible subject to other considerations such as design, security and future management arrangements'. The Policy could also be amended to remove reference to all children accessing all spaces and instead require demonstration at application stage of adequate provision of play space for each block or phase of a development. This approach will help to ensure that equitable play space provision is provided to meet the needs of future occupiers, and these spaces can be appropriately managed at occupation stage. In addition, there may be instances where play is provided within communal gardens accessible to future residents and not the wider public, such as within courtyard blocks. We request that Part C of Policy CI3 therefore be amended to seek play space having unrestricted public access where possible, subject to other considerations such as design, security and future management. This approach will help to ensure appropriate flexibility for future development schemes to come forward with housing typologies that optimises development and responds to the character and context of the site and wider area.		
Austringer Capital Ltd (Tetlow King Planning obo)	2	CI 05	*Relates to Call for site* **Policy CI5: Burial Space** 4.15 Policy CI5 explains the Council's approach to securing sufficient burial space to meet the needs of its communities, maintaining access to existing spaces for new burials and supporting the delivery of new cemetery sites. Part B of policy CI5 provides for new sites to come forward where these meet the needs of various groups within the Borough. In general terms, policy CI5 provides a suitable framework for burial spaces to come forward. 4.16 Paragraph 9.22 notes the existing evidence base for cemetery provision in Lewisham which includes the 2011 GLA Audit. However, paragraph 9.23 notes that the Council is preparing an updated assessment of local burial space capacity. The Council's decision to review burial space capacity is welcomed since the existing evidence base is dated and, based upon the FoI response we have received, indications are that there is a pressing need for burial space. 4.17 Whilst the general tenor of policy CI5 is welcome, we are concerned that the Local Plan currently only allows for the retention of existing burial space and for any new burial space to be identified on an 'ad hoc' basis through the planning application process. We recommend that in order to be positively prepared, the Local Plan seeks opportunities to allocate sites for burial provision. This will ensure the Council is able to match the supply of spaces with demand, ensuring a supply of burial space can be maintained throughout the Plan period. 4.18 As discussed at section 3 of these representations, the former Willow Tree Riding Establishment could provide a cemetery to deliver a potential 6,700 burial plots subject to detailed design.	The Infrastructure Delivery Plan acknowledges that following short-term upgrades to existing cemeteries there will be sufficient burial capacity in the medium to longer term. This position will be reviewed through future updates to the IDP. At this point, it is not considered that specific sites need to be allocated in the Local Plan for burial provision. Our response to the call for site for the former Willow Tree Riding Establishment is set out at the back end of this table.	No change.

L&Q Group	2	Section 10	*Relates to Call for site* 4.5 Green Infrastructure The draft Local Plan reiterates the requirements set out in the London Plan for maximising green infrastructure (including biodiversity net gain and urban greening factor targets) which L&Q supports in principle.	Support noted.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	2	Chapter 10	**Green Infrastructure** **Do you agree that the Local Plan has identified all of the issues around green infrastructure?** The Charity generally supports the approach taken to managing and securing green infrastructure. Green infrastructure required for the proposed site allocation at Bell Green Retail Park should be informed by a Masterplan for the Site. The need for a Masterplan is discussed in our answers on Part Three below.	Support noted.	No change.
Albacore Meeting Room Trust (Lichfields obo)	2	GR 01	*Relates to Call for site* **(d) Green Infrastructure** The Trust notes the importance of open space and the Council's network of green and open spaces, which make an important contribution to the local character of the Borough as well as encourage healthy lifestyles and social benefits. It is agreed that development proposals should maximise opportunities to provide green infrastructure on site (GR1). However, it is important that land should only be designated as MOL if it meets the criteria for designation. To do otherwise risks preventing redevelopment and enhancement of otherwise sustainable, previously developed sites, such as the site at Beckenham Hill. In fact, our representations at part 1 (including Appendix 1) demonstrate how such release of the site from the MOL and subsequent allocation for community use development could work to the benefit of the wider MOL swathe, in particular to enhance the existing site's (absent) contribution to the designated South East London Green Chain.	Support noted. The comments regarding the designation of MOL land and contribution to the South East London Green Chain are noted.	No change.
Austringer Capital Ltd (Tetlow King Planning obo)	2	GR 02	*Relates to Call for site* **Policy-Specific Comments** **Section 4** 4.1 This section provides our comments on the policy content of the emerging Local Plan. **Policy GR2: Open Space and Lewisham's Green Grid** 4.2 This policy seeks to achieve several objectives in relation to open space and green infrastructure, which include protection of existing open spaces, provisions for reconfiguration and ancillary uses, and the achievement of improved connectivity for active travel.	Noted.	No change.

			4.3 The policy as drafted takes a rigid approach in seeking no net loss of open space. Part C of the policy sets a presumption against development that results in a loss of open space, noting that such proposals will be 'strongly resisted'. In a similar vein, part D seeks to avoid a net loss of open space in re-configuring open space. 4.4 Whilst the protection of open space is a laudable principle, the 'no net loss' requirement is unduly restrictive and could prevent meaningful improvements to poor quality open spaces. For example, the open space designations across the Borough include private land to which there is no public access (indeed, this is the case at the former Willow Tree Riding Establishment site) and currently offer little benefit to residents. There may also be opportunities to achieve ecological enhancements, or linear walking routes, however these may need to come forward in the context of some development to allow them to occur – and indeed policies LEA4 and LEA5 recognise this in the context of the vision for the East area. As drafted, the emerging Local Plan makes it difficult to secure qualitative improvements to poor-quality open space where this would require some quantitative loss of open space. Yet, a loss of open space in quantitative terms might be able to support a meaningful improvement to the remaining open space in social and environmental terms. Conversely, without development some existing poor-quality or publicly inaccessible open space may remain so, offering little benefit as open space. 4.5 National planning policy does not require a 'no net loss' approach. Policy G4 'Open Space' of the London Plan seeks that '*Development proposals should not result in the loss of protected open space'* but also encourages the creation of '*publicly accessible open space, particularly in areas of deficiency*'. Table 8.1 of the London Plan sets out that open spaces may include 'Linear Open Space' alongside infrastructure routes but in contrast to other forms of open space may include elements of private land. 4.6 Clearly, there are tensions between maintaining the existing quantity of open space, and other objectives of improving quality and public access. We therefore recommend that the draft policy is revised to allow a more nuanced balance of the loss of poor quality open spaces with the potential for qualitative enhancements.		
Austringer Capital Ltd (Tetlow King Planning obo)	2 2	GR 02 Figure 10.2	*Relates to Call for site* **Figure 10.2: Open Spaces** 4.7 Figure 10.2 accompanies policy GR2 and illustrates the open spaces in Lewisham and their typology. Whilst this is an overarching plan for the entire borough, it nonetheless offers a reasonable degree of detail on specific sites. For example, the Willow Tree Riding Establishment site is identified as part of a Green Corridor but the existing areas of hardstanding are excluded. 4.8 There is the opportunity, through the production of more detailed Policies Maps, to review the open space designations for specific sites. It may be possible to exclude certain areas from sites which offer poor quality open space (e.g. areas of hardstanding or built form, or other parts of the site which are of limited ecological value) which may open more opportunities for development and changes of use to occur and support the enhancement of areas of greater open space or ecological value elsewhere at the site.	Noted. Following the Regulation 18 consultation the Council has undertaken additional evidence base work on Open Spaces, which together with public consultation responses, has informed revisions to the Open Spaces policy. This will set a clear hierarchy of open spaces and policies to support their protection.	Local Plan amended to clarify the different typologies of open space within an open space hierarchy and the level of protection afforded to each. This include clarification between green open spaces and other open spaces (e.g. hardstanding but part of public realm).

Albacore Meeting Room Trust (Lichfields obo)	2	GR 02	Lichfields corresponded with London Borough of Lewisham (LBL) Council Officers in Autumn 2020 obo the Trust, principally in respect of the limited contribution the existing site makes to the MOL and, as a consequence, the scope for full or partial release of the land. The Trust considers the site should be removed from the MOL and requests that it is allocated for redevelopment to provide a new flexible community use building. Accordingly, representations are first made in respect of the LBL Metropolitan Open Land Review, 5 March 2020 and justification is provided for allocating the site (Part 1), as well as to the following policy areas (Part2) of the draft Local Plan: a. Lewisham's South Area (LSA2) b. Spatial Strategy Options (OL1) c. Community Infrastructure (CI1) d. Green Infrastructure (GR1/GR2) **(Part 1) Metropolitan Open Land and Proposed Allocation** **Exceptional Circumstances Policy Test** Overarching MOL Policy is established through the London Plan (2021), Policy G3, which requires boroughs to designate the extent of MOL in their local plans with any changes to the existing boundaries to be undertaken through the local plan process. MOL is afforded equal status as Green Belt and the principles of national Green Belt policy apply to MOL. As such, the removal from the MOL and allocation of the Brethren site would need to be justified by 'exceptional circumstances' as per paras 137 – 139 of the NPPF. London Plan Policy G3 confirms that *'MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL as set out in Part B'* . The MOL criteria at 'Part B' are: ***A*** *"it contributes to the physical structure of London by being clearly distinguishable from the built-up area;* ***B*** *it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;* ***C*** *it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value;* ***D*** *it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria".* **LBL MOL Review Evidence Base: Lichfields Review** Lichfields has undertaken a review and assessment of the LBL Review of MOL in Lewisham, prepared by Arup in March 2020. The review is attached to these representations at Appendix 1. Our review assesses the contribution the existing Meeting Hall site currently and potentially could make to the MOL and, as a consequence, the scope for full or partial release of the land. The site lies within a wider swathe of designated Metropolitan Open Land, defined by Arup in its March 2020 review as 'Area 15'. A wider area of MOL land exists to the south comprising Beckenham Place. Arup's MOL Review concludes that Area 15 should be retained in the MOL, assessing it overall to fulfil its role for MOL purposes – meeting Criterion A but scoring weakly against other MOL	Lichfield's MOL assessment of this site is noted. However the Council has prepared its own MOL review using independent consultants and will use this as the basis for Local Plan decisions.	No change

			criterion, principally due to the area's limited public access, recreational value and performance in the Green Chain. The Lichfields MOL assessment builds on the LBL Arup Assessment and looks at both the site and wider MOL Area 15 in which the site is situated, having considered Arup's assessment approach and method. It finds that, whilst it is appropriate for Arup to have considered the site as part of a larger swathe of MOL, it is clear that there is a very weak case for retention in terms of the existing site's performance (on its own) against the MOL criteria – it does not meet the MOL designation criteria, save for criterion A (see above) in a 'very weak', partial sense. The site is developed and urban in nature, is private and entirely fenced off and does not include any features of national or metropolitan value. It is therefore requested that Area 15 should instead be considered for release from the MOL and partial enhancement of the retained open space as part of a new development allocation in the draft new local plan.		
SGN (Quod obo)	2	GR 02	*Relates to Part 3, LSA SA 01* **Chapter 10 - Green Infrastructure** 5.19 SGN supports Policy GR2 ambition to maximise opportunities for new publicly accessible open space to all new major developments in order to mitigate the identified open space deficiencies across Lewisham and enhance the existing network of open spaces across the borough.	Support noted.	No change.
Phoenix Community Housing (BPTW obo)	2	GR 02	**Green Infrastructure** The sanctity of the All London Green Grid Framework and its strategic role in the GLA's vision of a National Park City is agreed, and its proposed policy protection is strongly supported, as is the ambition to deliver net gains in biodiversity in all development. We are particularly pleased to see policy protection afforded to the Bellingham sports ground and the Temple land opposite Beckenham Place Park. However, for the more local open space and biodiversity assets such as allotments, SINCs, pocket parks and non-designated green spaces etc. we would request that greater flexibility is built into part D of policy GR2, which allows the reconfiguration of open space. Rather than no net loss of space, we propose that 'no net loss of functionality' is a more appropriate test. This would be more consistent with national policy, given the NPPF's recognition that open space can be multifunctional (e.g. play space, biodiversity, active travel, sustainable drainage, UGF), meaning that the benefits of open space can be expanded within a smaller area. Further, we suggest that Housing Associations with large management portfolios of existing estates as well as infill and brownfield opportunities would benefit greatly from added flexibility to allow reconfiguration of localised green infrastructure across the portfolio following careful consideration and in consultation with local residents. This would allow for a re-balancing of provision between areas of abundant greenery and areas of scarcity, raising the standard of provision in general across the portfolio, and means affordable housing can forward in the most appropriate locations available.	Noted. Following the Regulation 18 consultation the Council has undertaken additional evidence base work on Open Spaces, which together with public consultation responses, has informed revisions to the Open Spaces policy. This will set a clear hierarchy of open spaces and policies to support their protection, including consideration of amenity open spaces such as those on housing estates.	Local Plan amended to clarify the different typologies of open space within an open space hierarchy and the level of protection afforded to each. This include clarification between green open spaces and other open spaces (e.g. hardstanding but part of public realm).
QUOD (Landsec obo - Lewisham Shopping Centre)	2	GR 02	**Green Infrastructure** 12.8 Chapter 10 contains key policies on green infrastructure and biodiversity, ensuring that spaces and natural sites are protected and enhanced; improving public access to spaces and promoting urban green spaces. 12.9 Policy GR2 'Open space and Lewisham's green grid' seeks to ensure that all development proposals maximise opportunities to introduce new publicly accessible open space and that any loss will be strongly resisted. To avoid ambiguity between the Reg 18 plan and the London Plan, all references to open	Noted.	Policies on designated open spaces have been amended.

			space in parts C-G of the draft Policy GR2 should include the word *"protected"* in its terminology to reflect Part B of London Plan Policy G4 'Open Space'. A definition of protected open space should also be included in the glossary.		
QUOD (Landsec obo - Lewisham Shopping Centre)	2	GR 03	12.10Landsec is supportive of Lewisham's intended approach to net gains in biodiversity as detailed at draft Policy GR3 'Biodiversity and access to nature', as well as its affirmation of the urban green factor (UGF) in accordance with Policy G5 of the London Plan.	Support is noted.	No change.
L&Q Group	2	GR 04	*Relates to Call for site* Policy GR4 (D) requires development proposals to maximise the use of living roofs and walls. Whilst L&Q supports this policy direction in principle, as a housing association we are concerned about the cost of long-term maintenance and management of living roofs and walls and the impact this could have on service charges for future residents. As such, we request that affordability of new homes be taken into consideration when demonstrating whether it is feasible to include living roofs and walls in forthcoming development proposals.	Noted. The draft Local Plan does not set specific requirements in this regard, and encourages developments to maximise opportunities. Development feasibility and viability will be considered on a case-by-case basis.	No change.
SEGRO (CBRE Limited obo)	2	GR 04	*Relates to Part 3, LNA SA 04* SEGRO's key recommendations for the draft plan comprise: Requirements for an urban greening factor of 0.3 and a minimum plot ration of 65% for warehousing development should be removed to ensure general conformity with the London Plan 2021.	Noted.	Local Plan amended to reflect that target UGF for predominantly commercial development excludes B2 and B8 uses. Local Plan amended to provide new definition of industrial capacity and removal of 65% plot ratio.
SEGRO (CBRE Limited obo)	2	GR 04	*Relates to Part 3, LNA SA 04* 2. Urban Greening SEGRO prides itself on its commitment to sustainable design, which includes finding creative and high-quality solutions to biodiversity enhancement its new developments, and so the principle of urban greening policies is supported. At present, Part C of draft plan policy GR4 (Urban Greening) sets a target urban greening factor (hereafter "UGF") score of 0.3 for commercial development. As currently drafted, this policy is not consistent with the London Plan which requires 0.3 UGF target for commercial except B2 and B8 developments. The London Plan applied this exclusion for warehousing development in response to SEGRO's examination evidence which demonstrated that the policy would not be sound, due to the unique design and viability challenges of achieving a UGF score of 0.3 in warehousing development. One such challenge is the significant increase in embodied carbon within the building's structure that would be required to take the load of a green roof. Again, SEGRO's evidence to the London Plan on this point is appended for reference.	Support is noted. Agree that the Local Plan should be consistent with the London Plan, which now states a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).	Local Plan amended to reflect that target UGF for predominantly commercial development excludes B2 and B8 uses.

			LB Lewisham officer note: Appendix 2: Urban Greening Evidence is included in the original representation. To ensure conformity with the London Plan, draft policy GR4 should be updated so that the requirement for a UGF score for commercial excludes B2 and B8 uses.		
L&Q Group	2	GR 05	*Relates to Call for site* Policy GR5 (Food growing) encourages major development proposals to include provision of space for community gardening and food growing. We would welcome further guidance regarding the priority to be given to community gardening and food growing provision over other spatial requirements, such as children's play space, to ensure that we are able to make best use of space as part of future development projects.	Noted. Disagree. The London Plan sets standards for housing, including children's play space and indoor/outdoor amenity space. The suggested change would represent a departure from the London Plan.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	2	Chapter 11	**Sustainable Design and Infrastructure** **Do you agree that the Local Plan has identified all of the issues around sustainable design infrastructure?** No comments.	Noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	SD 01	**Sustainable Design & Infrastructure** 12.11Chapter 11 addresses sustainable design and infrastructure. Lewisham were one of the first local authorities to declare a climate emergency. This plan will play an important role in helping the borough to respond to the climate emergency. It provides the strategic framework for climate change mitigation and adaption in respect of the future use and management of land within the borough. 12.12Draft policy SD1 'Responding to the climate emergency' sets out the council's broad framework to become a net zero borough by 2050. This policy establishes principles to help deliver environmental sustainability, reflecting the importance of green and open spaces, biodiversity, urban greening; flood risk and resilience; air quality and net waste self-sufficiency. A plan, manage and monitor process will be used to support the successful transition to a net zero carbon Borough. The borough will regularly assess performance against their strategic objectives through the Authority Monitoring Report process, which will enable the plan to be kept up to date to reflect the latest requirements and standards at the regional and national levels. Landsec is supportive of this policy, having published their own net zero pathway in December 2020. 12.13Draft policy SD1 is proposed alongside more specific policies for sustainable design (SD2), minimising greenhouse gases (SD3) and design to support a circular economy (SD12), which taken as a whole, will support the transition to net zero through spatial planning and design standards.	Comments noted.	No change.
Fifth State and (Avison Young obo)	2	SD 02	*Relates to Part 3, LNA SA 16* ***Draft Policy SD2 - Sustainable Design*** Part D of the draft Policy requires new non-residential development of 500 sqm or more to achieve a BREEAM 'Excellent' rating. At present this wording does not allow for any site specific technical constraints which may mean that an 'Excellent' rating cannot be achieved. We therefore request that the policy wording is amended to seek to achieve (rather than require) developments to achieve an 'Excellent' rating, with appropriate justification to be provided at	Noted. Disagree that the policy should seek to achieve, rather than require, although agree that a justification should be provided where this cannot be met.	Local Plan amended to clarify that development proposals must meet the requirement unless it can be demonstrated that this is not feasible.

			planning application to explain the rating that is possible for the development to meet.		
L&Q Group	2	SD 02	*Relates to Call for site* Policy SD2 (C) requires major residential domestic refurbishment proposals to achieve a certified 'Excellent' rating under the BREEAM Domestic Refurbishment 2014 scheme, or future equivalent. Whilst L&Q supports reducing the environmental impact of refurbished buildings, as a housing association we are concerned that an 'Excellent' rating will not be achievable in every case and may impact the ability to deliver affordable housing due to prohibitive costs. To allow flexibility, we suggest this policy be reworded to encourage the achievement of an 'Excellent' rating as an aspiration rather than an expectation.	Noted. The Local Plan Viability Assessment demonstrates that the requirement can be viably delivered. However it is recognised there may be technical feasibility issues.	Local Plan amended to clarify that development proposals must meet the requirement unless it can be demonstrated that this is not feasible.
Barratt London and the Church Commissioners (Avison Young obo)	2	SD 02	*Relates to Part 3, LCA SA 20* **Chapter 11 Sustainable Design & Infrastructure** **Draft Policy SD2 Sustainable design** Part B of the Draft Policy requires residential development to achieve the BRE Home Quality Mark. Given the BRE Home Quality Mark is a relatively new standard within the industry and may be subject to future change, we request the policy wording is amended to 'seek' /'target' rather than 'require' development to achieve the BRE Home Quality Mark, with consideration given to site specific circumstances. Part D of the Draft Policy requires new non-residential development of 500 sqm or more, to achieve a BREEAM 'Excellent' rating. At present this wording does not acknowledge there may be site specific technical factors that mean an 'Excellent' rating cannot be achieved. We therefore request the policy wording is amended to 'seek' or 'target' rather than 'require' development to achieve a BREEAM 'Excellent' rating, with appropriate justification to be provided at the application stage to explain the rating level the development would meet.	Noted. The Local Plan Viability Assessment demonstrates that the requirement can be viably delivered.	Local Plan amended to state that proposals should seek to achieve the Home Quality Mark.
Cockpit Arts (The Planning Lab obo)	2	SD 02	*Relates to Part 3, LNA SA 14* • CA is supportive of policies which require a sustainable approach to development, particularly a reduction in carbon emissions to reach net zero. Our makers are also committed to these principles, and to the circular economy generally, and can play a key role including in terms of local production, innovative use of waste materials, supporting repair and development of skills in the local economy, and as role models/exemplars.	Support noted.	No change.
Artworks Creekside (Avison Young obo)	2	SD 02	*Relates to Part 3, LNA SA 16* ***Draft Policy SD2 - Sustainable Design*** Part D of the draft Policy requires new non-residential development of 500 sqm or more to achieve a BREEAM 'Excellent' rating. At present this wording does not allow for any site specific technical constraints which may mean that an 'Excellent' rating cannot be achieved. We therefore request that the policy wording is amended to seek to achieve (rather than require) developments to achieve an 'Excellent' rating, with appropriate justification to be provided at planning application to explain the rating that is possible for the development to meet.	Noted. The Local Plan Viability Assessment demonstrates that the requirement can be viably delivered. However it is recognised there may be technical feasibility issues.	Local Plan amended to clarify that development proposals must meet the requirement unless it can be demonstrated that this is not feasible.
Transport for London	2	SD 02	**SD2 Sustainable design**	Noted. The Local Plan Viability Assessment	Local Plan amended to state that proposals

Commercial Development			It is noted that criterion B requires new residential development to achieve the BRE Home Quality Mark. The ministerial statement in March 2015 indicated that local planning authorities would not be able to require any standards above the regulatory minimum for new dwellings apart from those set out in the new national options and it is considered that the requirement for the BRE Home Quality Mark would not accord with this.	demonstrates that the requirement can be viably delivered.	should seek to achieve the Home Quality Mark.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	SD 02	12.14Draft policy SD2 lists various design requirements for new and existing development. It is noted at part B that proposals for new self-contained major and minor residential development will be required to achieve the BRE Home Quality Mark. Supporting text identifies that 'proposals are strongly recommended to achieve a minimum 3-star rating' but is not prescribed in policy. This flexibility is welcomed.	Support noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	SD 03	12.15Draft policy SD3 relates to minimising greenhouse gases and reflects the London Plan requirements for carbon reduction. Policy SD3 C states that major development proposals will be required to achieve a minimum on-site reduction of at least 35 per cent (beyond the baseline of Part L) of the current Building Regulations. Part D of the policy confirms that under exceptional circumstances where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, development proposals will be required to make contributions to address the identified shortfall through a cash-in-lieu contribution to Lewisham's carbon offset fund; or appropriate off-site measures where these can be demonstrated to be deliverable. This requirement indicates that in general net zero should be achieved on sites, unless there are exceptional circumstances, albeit it appears to contradict part C, which states that a minimum 35% will be obtained. It is recognised that the intent of the policy should be to maximise carbon savings on site, however clarification is recommended with regards to Part C and D of this policy.	Noted.	Policy SD3 revised to provide more clarity.
L&Q Group	2	SD 04	*Relates to Call for site* Policy SD4 (G) requires major housing proposals to submit an estimated heat unit supply price, annual standing charges, and projected annual maintenance costs for their proposed Energy Strategy. We note that this is a high level of detail (over and above that required by the London Plan) to be provided at planning submission stage and figures will be subject to change upon the completion of fully co-ordinated technical design at RIBA Stage 3, which typically occurs post-planning. We therefore request that the level of detail able to be provided at planning submission stage not be a barrier to receiving planning approval, and consider the energy performance of new buildings would be more appropriately controlled through the application of appropriately worded planning conditions and / or the building control regime.	Noted. Agree that there should be flexibility regarding the timing for submitting this information and that they can be controlled through planning obligations or Building Control.	Policy amended using proposed wording
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	2	SD 09	*Relates to Part 3, LNA SA 14* **Water management** We note that Policy SD9 (Water management) relates to watercourses and flood defences. The supporting text in paragraph 11.53 states prescriptive relief (set back distances) between new development and river frontages – unless otherwise agreed by the Council and Environment Agency, with buffer zones left free of permanent structures and integrated into a new development to enhance their amenity value. It states as follows: *In order to ensure there is no adverse impact of the natural functioning of a watercourse, or the integrity of a flood defence, all new development must maintain an undeveloped buffer zone with an adequate set back distance from the watercourse. A relief of 8 metres from a main river and 5 metres from an*	Noted. The Local Plan sets these benchmark requirements on the advice of the Environment Agency, and already provides flexibility to other distances provided these are agreed by the Council and EA.	No change.

			ordinary watercourse should be secured, ***unless otherwise agreed by the Council and the Environment Agency****. Buffer zones should be left free of permanent structures, ensure adequate access for the maintenance of flood defences and be sensitively integrated into development in order to enhance their amenity value…" (Our Emphasis.)* It is considered that the drafting of the policy is currently overly prescriptive and would unnecessarily constrain redevelopment. This would **not be effective** and could restrict the **delivery** of future redevelopment and any associated full benefits, including new homes, new affordable homes and new jobs. We consider that each site must be considered on its own merits and any relief (set back distance) between new development and the frontage to be agreed with the Council and the Environment Agency on a case by case basis, having regards to all relevant technical matters, site specific constraints and development that would be brought forward, including the overall planning and public benefits. Whilst it is acknowledged that the current drafting includes the following text: "*unless otherwise agreed by the Council and the Environment Agency"* – and could potentially allow an alternative set back distance to be agreed with the Council and Environment Agency, we consider the policy should be updated as follows (the deletions are shown as strikethrough, the additions are shown underlined): ~~*A relief of 8 metres from a main river and 5 metres from an ordinary watercourse should be secured, unless otherwise agreed by the Council and the Environment Agency.*~~ *A relief from a main river or ordinary watercourse should be secured and agreed by the Council and the Environment Agency.* This would ensure that the policy **is effective** and **deliverable**.		
L&Q Group	2	SD 12	*Relates to Call for site* Policy SD12 (E) requires that all new proposals for multi-storey flatted residential development make provision for "sensitively designed storage and collection systems at each floor". It is industry practice that space is provided within the flat and then either at ground / basements; it is not considered appropriate to provide additional storage within common areas at each floor level. This will create the need to larger cores and circulation space, likely increasing the bulk and massing of buildings. Moreover, it will create additional management and management requirements and associated increased service charges. Part E also requires that design options for basement servicing be investigated before considering the use of forecourts or ground floor internal storage. It is considered inappropriate to promote basements above the use of forecourt or ground floor internal storage. Basements are costly and often, in highly contaminated areas, inappropriate for excavation for public health reasons. We therefore request that greater flexibility be offered when consideration the most appropriate servicing strategy, taking into account site-specific constraints. Basements should not be the preferred starting point.	Noted.	Local Plan amended by providing more flexibility to waste management design for new developments.

Barratt London and the Church Commissioners (Avison Young obo)	2	SD 12	*Relates to Part 3, LCA SA 20* **Draft Policy SD12 Design to support the circular economy** Barratt London and the Church Commissioners support the application of the London Plan circular economy approach in Part A of the Draft Policy. Part E of the Draft Policy states new multi-storey flatted residential development, including mixed-use development, must make provision for sensitively designed storage and collection systems on each floor. This does not reflect how waste is collected from the majority of new build schemes delivered in the borough or across London. The approach to waste collection should be determined with regard to technical and design considerations and in discussion with the Council's Waste and Highways Officers, to ensure development makes the most efficient use of land and satisfies other requirements such as Secured by Design and Building Regulations, where necessary. We therefore request Part E is amended to remove reference to a requirement for 'storage and collection systems at each floor' to be delivered.	Noted.	Local Plan amended by providing more flexibility to waste management design for new developments.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	SD 12	12.16Draft Policy SD12 'Design to support the circular economy' requires that major development proposals aim to be net zero-waste and are required to submit a Circular Economy Statement, as part of the Sustainable Design Statement. Landsec are supportive of this approach.	Support is noted.	No change.
L&Q Group	2	Section 11	*Relates to Call for site* 4.6 Sustainable Design & Infrastructure L&Q recognise the need for sustainable design principles in new developments. The London Plan now requires the submission of Circular Economy Statements and Whole Life-cycle Carbon Assessments, as well as Urban Greening Factor and Biodiversity Net Gain information. For consistency, we consider that Lewisham's local requirements should be brought into line with those of the adopted London Plan, and that the requirements of a Sustainable Design Statement will already be covered by these planning deliverables.	Noted. The Local Requirements List is outside the scope of the Local Plan. This will be amended in line with the extant Development Plan.	No change.
L&Q Group	2	Section 12	*Relates to Call for site* 4.7 Transport & Economy L&Q welcomes the LBL's approach of giving consideration to future planned Public Transport Accessibility Levels when assessing new development proposals, given the key role the Bakerloo Line Extension would play in the Borough should this project come forward.	Support noted.	No change.
Transport for London Commercial Development	- 2	General TR 01	**RE: LEWISHAM LOCAL PLAN MAIN ISSUES AND PREFERRED APPROACHES REGULATION 18** Thank you for providing the opportunity to comment on the Lewisham Local Plan Main Issues and Preferred Approaches Regulation 18. Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.	Noted. Comments to additional representations set out elsewhere in the Consultation Statement.	No change.

			TfL CD have previously submitted the following representations: –Lewisham Call for Sites (October 2018) Please note that our attached representations are the views of the Transport for London Commercial Development planning team in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and/or as the strategic transport authority for London.		
Transport for London Commercial Development	- 2	General TR 01	Concluding Remarks We hope that these representations are helpful but if you need any further information or would like to discuss any of the points raised in our representations, please do not hesitate to contact me. We look forward to being kept up to date with your programme going forwards.	Noted.	No change.
Transport for London Commercial Development	2	TR 01	**TR1 Sustainable transport and movement** Criterion a. of this policy is strongly supported.	Support noted.	No change.
Notting Hill Genesis (Savills obo)	2	TR 01	*Relates to Call for site* *Other Matters* NHG supports the Council's approach to sustainable transport through encouraging a shift away from car use to more sustainable transport modes as set out within the draft Local Plan Policy TR1. This policy further states that development proposals should make the most effective use of land and optimise the capacity of sites by taking into account connectivity and accessibility to existing and planned future public transport. NHG supports the Council's approach to optimising site capacity, which is in accordance with the London Plan.	Support noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	2	TR 01	*Relates to Part 3, LEA SA 03* 4. Transport and Connectivity Policy TR1 (Sustainable transport and movement) remarks that the integration of land use and transport, along with an effective public transport network, are essential to delivering inclusive, healthy, liveable, walkable and sustainable neighbourhoods in Lewisham. Policy TR1 adds that priority should be given to reducing car use and improving opportunities for movement by walking, cycling and the use of public transport. GHL strongly supports Policy TR1 and recommends that the supporting policy text emphasises the importance of sustainable alternatives, in accordance with Chapter 9 (Promoting sustainable transport) of the NPPF and Policy T1 (Strategic approach to transport) of the London Plan.	Support noted. Disagree that additional supporting text is needed as the policy already clearly sets out the importance of sustainable forms of transport.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	2	TR 02	**Transport and Connectivity** **Do you agree that the Local Plan has identified all of the issues around transport connectivity?** We support the inclusion of Policy TR2 'Bakerloo Line Extension' and the requirement for development proposals to optimise the use of land and capacity of sites taking into account the BLE and future improvements to public transport.	Support noted.	No change
SGN (Quod obo)	2 2	TR 02 Figure 12.2	*Relates to Part 3, LSA SA 01* **Chapter 12 – Transport and Connectivity**	Agree that the Local Plan should reference the adopted version of the London Plan. Agree that reference should be made	Local Plan amended to reflect proposed wording and to remove "Draft" from the

			5.20 Policy TR2 is fully supported by SGN to which it is acknowledged that the upgrade of the Bakerloo is fundamental to the realisation of Lewisham's strategic objectives. 5.21 Point C) outlines development proposals on sites within 400m of a new Bakerloo stations will be subject to close scrutiny so that it does not preclude the delivery of the Bakerloo line extension. Figure 12.2 shows the proposed route of the line and potential stations, however, with respect of the stations between Lewisham and Lower Sydenham, the locations of new stations are yet to be confirmed. Accordingly, the following text should be included: *Development proposals on sites located within 400 metres of a proposed Bakerloo line station or safeguarded location will be closely scrutinised to ensure that development does not preclude the delivery of the Bakerloo line extension, and further optimises the future accessibility provided by its introduction into the local area. This may include provision for new or improved public realm and infrastructure enhancements.* 5.22 Finally, the Plan refers to the *'draft London Plan'* throughout. This should be updated following adoption of the London Plan in February 2021.	to safeguarding locations for the BLE.	references to the London Plan. Local Plan amended to reflect BLE safeguarding directions.
WSP (Sainsbury's Supermarkets Ltd obo)	2	TR 02	**Amendments to the Local Plan** 84. As it will be at least 10 years before BLE considered for funding, there is a strong case for reference to the BLE to be removed from the Local Plan, given that it will blight regeneration and redevelopment that will otherwise come forward in the next 10 years.	Disagree that reference to the BLE should be removed from the Local Plan. The planned growth within the Local Plan is not predicated solely on the delivery of the BLE. Julia???	No change.
L&Q Group	2	TR 04	*Relates to Call for site* Whilst we recognise the environmental benefits of 'car-free' development, there are parts of the Borough with poor public transport accessibility where greater flexibility for parking should be allowed. We have experienced at the Excalibur where limited car parking in the area of low PTAL (level 1b) has impacted sales rates and values, with knock-on impacts on the scheme viability. Moreover, for estate regeneration proposals in particular, regard needs to be given to re-provision of car parking spaces for existing residents who will be re-housed. This criteria is not included in the sequential approach under Policy TR4(D). To assist with this approach, we suggest that a flexible approach as set out in the London Plan be adopted, which prioritises disabled persons parking but allows other parking provision to come forward subject to further assessment / justification.	Noted. The draft Local Plan parking standards will need to be updated to align with those in the London Plan.	Local Plan parking policies amended to ensure conformity with the London Plan.
Barratt London and the Church Commissioners (Avison Young obo)	2	TR 04	*Relates to Part 3, LCA SA 20* **Chapter 12 Transport and Connectivity** **Draft Policy TR4 Parking** Barratt London and the Church Commissioners support the application of the London Plan cycle parking standards for all uses and the residential car parking standards as sought by Part B of the Draft Policy.	Noted. The draft Local Plan parking standards will need to be updated to align with those in the London Plan.	Local Plan parking policies amended to ensure conformity with the London Plan.

			With respect to car parking for non-residential uses, Part B also applies the London Plan standard which is car free (with the exception of accessible spaces) for schemes in areas of PTAL 5-6. The Plassy Island site currently provides car parking to serve the existing retail uses, and there may be a commercial and operational need for parking to be re-provided to serve the future occupiers of the new retail/commercial floorspace. We, therefore, request the Draft Policy is amended to state that '*whilst London Plan car parking standards are sought for retail and commercial uses, site specific circumstances will be taken into account including existing parking provision, future commercial and operational needs, and contribution of parking to support wider town centre objectives'*. Part E of the Draft Policy states major development proposals should investigate opportunities to integrate space for cycle hubs to accommodate the provision of cycle hire schemes, as well as space for cargo bikes. Part K of the Draft Policy states development proposals for residential and commercial uses will be expected to investigate opportunities to implement rapid electric vehicle charging points, having regard to the Council's Low Emissions Vehicle Charging Strategy. The current wording of Part E and K is supported as it provides adequate flexibility for schemes to come forward with the most appropriate transport provision determined by relevant site-specific considerations.		
GHL (Leegate) Limited (Frank Knight obo)	2	TR 04	*Relates to Part 3, LEA SA 03* Policy TR4 (Parking) states that development proposals will be assessed against the parking requirements set in the London Plan 2021, and parking standards will be considered against existing and future planned Public Transport Accessibility Level (hereinafter 'PTAL'). Policy TR4 adds a sequential approach will be applied to development proposals for housing where they require the provision of parking. GHL considers that it is inappropriate to set further parking requirements over and above the London Plan Policy T6 (Car parking). Car parking requirements should be determined on a site-by-site basis, as such, justification will be required for the sequential approach to ensure the policy is effective and deliverable. In sustainable locations such as Lee Green District Centre, a reduction or at least consolidation of car parking could be supported. Furthermore, the amount of parking required for new development should be considered carefully in the context of the Government seeking to reduce car ownership and travel. Policies should be encouraging the use of public transport and other forms of sustainable travel, reducing the reliance on private cars. GHL considers that all development proposals in places that are (or are planning to be) well-connected by public transport should minimise the amount of new car parking delivered; this not only encourages use of public transport but also ensures a more efficient use of land. We suggest that the Council adopts a	Noted. The draft Local Plan parking standards will need to be updated to align with those in the London Plan.	Local Plan parking policies amended to ensure conformity with the London Plan.

			flexible approach to car parking which takes account of site-specific circumstances.		
GHL (Leegate) Limited (Frank Knight obo)	2	TR 04	*Relates to Part 3, LEA SA 03* Lastly, Policy TR4 states major development proposals that are likely to generate significant number of visitors should review opportunities for space for cycle hubs to accommodate the provision of cycle hire schemes, as well as space for cargo bikes. GHL supports the provision of short-stay cycle spaces in accordance with the London Plan minimum cycle parking standards (Policy T5, Cycle Parking). This further cycle parking requirement first needs to define what LBL considers is a 'significant number of visitors' and should also be justified in viability terms. It is GHL's understanding that there is no justification in the evidence base for an alternative approach to the London Plan. If additional cycle parking requirements are to be set these need to be justified through robust evidence.	Noted. The draft Local Plan parking standards will need to be updated to align with those in the London Plan.	Local Plan parking policies amended to ensure conformity with the London Plan.
Tesco Stores Ltd (Lichfields obo)	2 2	TR 04 Para 12.21	*Relates to Part 3, LCA SA 06 and LCA SA 19* **Retail Car Parking (Policy TR4)** Draft Lewisham Local Plan Policy TR4 B and explanatory para 12.21 state that development proposals should meet the parking requirements and standards set out in the 'draft' London Plan. This reference will require updating now The London Plan 2021 (LP) has been published. More significantly, the approach to retail parking in the LLP must now reflect the change at limb G of LP policy T6.3, arising from a policy modification required by the SoS to enabling a less restrictive approach to retail car parking to apply in specified circumstances. Specifically, TC6.3G states: *"G. Boroughs may consider amended standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence that the standards in Table 10.5 would result in:* *a. A diversion of demand from town centres to out of town centres, undermining the town centres first approach.* *b. A significant reduction in the viability of mixed-use redevelopment proposals in town centre."* Over time, there are likely to be reductions in parking demand associated with large scale food retail sites, and a rise in online deliveries. Despite this, pre-pandemic, more than 80% of UK shoppers still carried out a weekly/fortnightly main food shop. The volume of purchases made at a typical weekly/fortnightly shop often means that transporting goods on foot, cycle or by public transport is unfeasible. Therefore, whilst there remains a public desire to shop in this way, it will be necessary to provide appropriate levels of car parking for large food stores to remain viable. A reduction in car parking demand, the use of alternative modes of travel and increase of on-line shopping over time has been evident at the Tesco large stores in Lewisham and Catford. However, car borne main food shopping trips do continue to comprise a sizeable proportion of each store's turnover. Tesco would not proceed with redevelopment of either store to achieve significant development intensification, if it meant any required replacement store in these town centre PTAL 5-6 locations had to be served by a level of car parking provision less than that required by expected customer demand. To do so would	Noted. The parking standards will need to be updated to align with those in the London Plan.	Local Plan parking policies amended to ensure conformity with the London Plan.

			undermine both the store's trading and redevelopment viability to the detriment of the Tesco business, shoppers and the vitality and viability of town centres. Accordingly, we recommend an additional paragraph is added to the explanation of policy TR4B(f) on Retail Parking to address the above. It is noted that the development guidelines for both Site Allocation SA6 and SA19 include specific guidelines for car parking provision. Specific representations are made on each of these in the sections below.		
QUOD (Landsec obo - Lewisham Shopping Centre)	2	TR 04	**Transport and Connectivity** 12.17Chapter 12 contains key policies in relation to Transport and Connectivity. 12.18Policy TR4 B 'Parking' confirms the Council's approach to car free development (for residential and retail) in locations with a PTAL score of 5-6 in line with the standards set out in London Plan Policy T6 'Car Parking'. 12.19Whilst Landsec are supportive of sustainable transport initiatives and the Council's ambition for car free development in high PTAL locations, Landsec also recognises that there can be a practical requirement to deliver on-site car parking for family housing in such locations. We consider that Policy TR4 B could include support for on-site parking for family housing, which could negate the risk of overspill parking that could be created by these users who require access to a vehicle.	Noted	Car parking requirements have been amended to reflect those within the London Plan.
Kier Property (Carter Jonas obo)	3 3	Section 13 Table 13.1	*Relates to Call for site* Table 13.1 of the Local Plan outlines that a Background Paper has been produced to outlines indicative site capacities. We recommend that with the inclusion of our client's land, the site allocation is revised and the proposed indicative range outlined in the site allocation is clearly expressed as a *minimum* to allow for a design-led development that maximises the opportunity available.	Disagree. Table 13.1 states that the figures are indicative. Optimal capacity for the site will be established at planning application stage through a design led approach.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	3	Table 13.1	**13 Part Three – Chapter 13 and 14 Lewisham Central Area** 13.1 Part three of the Reg 18 Plan considers Lewisham's neighbourhoods, celebrating Lewisham's diversity and valuing its distinctiveness. To assist with understanding and appreciating Lewisham's local distinctiveness, and to establish 'place-based' priorities for guiding investment and sensitively managing growth and new development, Part 3 of the Reg 18 Plan is organised around five-character areas. Table 13.1 13.2 Table 13.1 includes indicative capacities for housing; workspace (gross m^2); and town centre use floorspace (gross m^2). A net additional requirement is also included (excluding consented development) of 38,327m^2 workspace and 24,361m^2 town centre uses. 13.3 For consistency ~~workspace~~ should be replaced with employment to reflect the site allocations. For the reasons set out in previous sections of this report, the Reg 18 Plan is not yet supported by an evidence base to support the net additional floorspace figures in Table 13.1.	The Local Plan is supported by an evidence base that is proportionate and responds to higher level policy.	Table 13.1 amended.

Tesco Stores Ltd (Lichfields obo)	3	LCA 01	*Relates to Part 3, LCA SA 06 and LCA SA 19* **Lewisham Central Area (Policy LCA1)** Tesco welcomes the vision and spatial objectives for Lewisham's Central Area Place Principles, including its focus on the linked but complementary town centres of Lewisham and Catford. Tesco supports the ambition of both Policy LCA1B (b) to support "*Lewisham major centre's transition to a metropolitan centre of sub-regional significance"* and of LCA1B (c) to support *" The comprehensive regeneration of Catford major centre, reinforcing its role as the Borough's principal civic and cultural hub".*	Support noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	3	LCA 01	LCA1 Central Area place principles 13.4 Chapter 14 Vision and LCA1 for Lewisham's Central Area confirms that by 2040 development of key strategic sites along with the arrival of the Bakerloo line extension together with the modernisation of Lewisham interchange will have a transformative effect, and will shape Lewisham major town centre into a *potential* metropolitan centre of exceptional quality (LCA1(B)).	Comments noted.	No change.
Freeths LLP (K/S Lewisham obo)	3	LCA 02	The strategic objectives of Policy LCA2 relating to development requirements in the major centre are also supported and well suited to the Site.	Support noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	3	LCA 02	LCA2 Lewisham major centre and surrounds 13.5 Policy LCA2(A) Lewisham major centre and surrounds seeks continued investment in Lewisham major centre to enable its transition to a *potential* metropolitan centre of sub-regional significance in London, and a gateway to the south east, a strategic priority. The policy seeks to ensure that a complementary mix of uses, including new housing, should be delivered "*whilst ensuring that the centre's predominant commercial role is maintained and enhanced"*. Landsec would like to explore this objective further with the Council. Maintaining and enhancing the predominant commercial role of Lewisham Town Centre may not represent the necessary flexibility required to secure its vitality and viability. 13.6 Policy LCA2(H) seeks *"an appropriate mix of main town centre uses at the ground floor level'. Landsec supports this. `Retail uses should be concentrated within the Primary Shopping Area, forming the main use across the shopping frontages, and supported with a wider range of complementary commercial, leisure and cultural uses elsewhere."* Landsec supports the objective that retail should form the main uses across the shopping frontage. 13.7 Landsec also recognise that retail uses may not comprise the main use across the Primary Shopping Area at ground floor level. The reason for this might be due to the capacity for retail floorspace in the Primary Shopping Area; urban design requirements; Class E which broadens the range of uses; and an evolving understanding of town centre vitality and viability.	We believe the Local Plan strikes the appropriate balance between maintaining the retail function of the town centre whilst providing a degree of flexibility to ensure its vitality and viability.	No change.
Canada Life Ltd (Williams Gallagher obo)	3	LCA 03	*Relates to LCA SA 22* **Policy LCA3: Catford major centre and surrounds -** We support the principles of the policy with the exception of Criteria H which will need to include flexibility around the deculverting the Ravensbourne River for the reasons set out above.	Support noted. Enhancing the river environment is an integral part of improving Catford major centre and surrounds. The policy already provides flexibility as Part H does not require	No change

				deculverting of the River Ravensbourne but rather says development proposals must maximise opportunities to do so.	
Transport for London Commercial Development	3	LCA SA 01	Lewisham's Central Area: Site Allocation **1 - Lewisham Gateway** TfL CD are broadly supportive of the 'Lewisham Gateway Site' and consider the allocation for "*comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community and residential uses*" to be appropriate. TfL CD recognise that the redevelopment of the 'Lewisham Gateway Site' has commenced. TfL property interests comprise the Thurston Road Bus stand, which has recently been safeguarded for the BLE, the bus facility at Conington Road, the DLR station and TLRN highway land. In operational terms TfL are also interested in the taxi rank and bus stops and stands on Station Road and bus stops on borough highway.	Comments noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	*LB Lewisham officer note: The comments below provide an abridged version of the 72 page submission.* *LB Lewisham officer note: Chapter 1 of the submitted response provides an Executive Summary. It's content summarises the more detailed points below.*	The supplementary information is noted. Our response is set out below.	No change.	
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	*LB Lewisham officer note: Chapter 2 of the submitted response provides an Introduction. In summary, Landsec:* - *welcomes the opportunity to engage with Lewisham Council.* - *supports the Council's ambition for growth and renewal across the borough and within Lewisham Major Town Centre.* - *undertook a feasibility assessment to rethink the future of Lewisham Shopping Centre.* - *engaged with Lewisham Council, the GLA, community groups and organisations, market traders, residents, shoppers, and political stakeholders.* - *recognises challenges - town centres and the way we shop have been rapidly changing due to the growth of online shopping, structural change accelerated by COVID-19, established high street retailers have gone into administration and how town centres are used by local people and retailers will now change forever.* - *has an ambition to secure a vibrant and vital future for Lewisham Shopping Centre, it may have to be achieved in a new and innovative way supported by a flexible development plan.*	The supplementary information is noted. Our response is set out below.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	2.7 Landsec undertook a listening exercise in 2020, focussed on the following six key themes: town centre experience, town centre living, arts and culture, employment, local environment, getting around. 2.8 The consultation involved a six-week consultation period; 10,000 newsletters; contact with 115 community groups and organisations; a consultation website; Facebook advertising to promote the consultation process; two virtual village halls; and street canvassing.	The supplementary information is noted. Our response is set out below.	No change.

		2.9 Landsec received an excellent response with 2,231 website visits; 732 consultation responses of which 25% responses were from BAME other ethnic groups. 2.10 A summary of what people told us is set out below. 60% visited the town centre once a week or less. Change is wanted: people want a cleaner, safer town centre, redesigned shopping centre, and more pedestrian areas. More independent retailers, cafes & restaurants are sought. Lewisham market is popular, but there are strong views about the way it is managed. 71% said new arts and cultural space would improve the town centre. Adding more shops ranked lowest as a positive impact. 2.11 There is a strong desire for it to become a vibrant and exciting place again, with recognition for change. Lewisham Shopping Centre is key to that new start with a desire to see more in the town centre than retail, with a strong focus on cultural and other uses such as community and Food & Beverage ("F&B").		
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	*LB Lewisham officer note: Chapter 3 of the submitted response provides Landsec's Vision. In summary it explains:* - *how Landsec is a market leader in reimagining and growing development in London and the UK,* - *that rethinking the future of Lewisham Shopping Centre presents a significant opportunity to contribute to the long-term wellbeing of local people by thinking carefully about jobs, skills, business, health, and the environment, creating and implementing social value.* - *the need for diversification and that Landsec's reaction to the fundamental changes facing town centres was already in motion prior to the pandemic.*	The supplementary information is noted. Our response is set out below.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	3.12 Lewisham Shopping Centre has been at the heart of the town centre for over 40 years and is in need of renewal. 3.13 Lewisham Shopping Centre was opened in 1977 as the Riverdale Centre, the largest building in Lewisham town centre. The centre comprised 70 shops set over 3 floors, an 800-space car park, offices, a large internal service road and a disused leisure centre. 3.14 The disused leisure centre has been closed for at least 21 years and offered sports facilities such as gymnastics, a five-a-side football, and badminton as well as an indoor crown green bowls court, bar area and function rooms. On the ground floor was the Riverdale Hall, the Obelisk pensioners day centre and Spotlights bar. The Hall hosted a variety of events including an Elvis Presley exhibition, a Christmas ice rink, tea dances, antiques markets, and a Saturday morning cinema club. 3.15 The design of the shopping centre (as a covered mall) results in a 100% plot ratio which offers limited opportunities for permeability and urban greening. It is an inclusive and enclosed environment solely reliant on retail occupancy and customer footfall to generate vitality and vibrancy. Without sustained long term	The supplementary information is noted. Our response is set out below.	No change.

		retail occupancy, there is no reason for the local community to visit the centre. It will have an adverse impact on vitality and viability of Lewisham as a whole. 3.16 Landsec has tried to keep the centre as occupied as possible however this has its challenges due to the restructuring of the retail sector and in the long term is not a sustainable optimum solution for Lewisham Town Centre. Covid has created a greater issue by accelerating the structural change in retail, and through the loss of many high street retailers has removed current and future tenants. There simply are not the quantity and quality of tenants available to occupy the floorspace in a way which benefits the town centre in the long term. 3.17 Lewisham Shopping Centre comprises c.28,000 sqm (NIA) of floorspace of which over a third is vacant; at risk of vacancy; or a short term let/concession. 70% of the floorspace is at ground floor, with 30% at first or second floor. Most of the centre is in retail use, with only a very limited food and beverage offering. 3.18 There is also c.6,800sqm of vacant buildings comprising the former Riverdale Hall (c.1,700sqm) and former leisure centre (c.4,500sqm) both of which are disused and have been vacant for many years. 3.19 Adjacent to the shopping centre is the popular Lewisham market. Home to a range of stalls selling fruit, vegetables, food and clothing, it has been running since 1906. Immediately to the south of the centre is the Model Market, opened in the 1950s selling model toys it closed in the 2000s, but re-opened to host Street Feast offering pop up drinking and dining experiences. 3.20 In 2022 London Borough of Lewisham will be London's Borough of Culture. To celebrate, the borough will curate a year of arts, cultural events and activities. The borough is home to a number of arts and cultural organisations, of which many are based in the town centre. 3.21 Lewisham is a diverse borough with residents who have stories from around the world, Landsec want to make the town centre a place where this diversity is celebrated. Landsec want to find out more about Lewisham's evening economy and explore opportunities to create a more active town centre later in the day. 3.22 The Migration Museum exemplifies the Landsec and the borough's shared commitment to diversity and openness and already performs an important role for the town centre which could be explored further.		
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	3.23 Landsec's vision for Lewisham Shopping Centre is set out below. *Located as the heart of Lewisham town centre, the sustainable and mixed-use transformation of Lewisham Shopping Centre will re-integrate the place within its surrounding fabric, weaving the old and the new to create a layered living neighbourhood above a high performing and vibrant commercial centre. To secure Lewisham's future, healthy living and flexible working will come together around a diverse leisure and retail offer that caters for all. Increased opportunities for new connections will open the site up to bring the nature in. The place-shaping process will be inclusive and informed by public engagement to build upon what already makes the place special, and ensure the place grows organically over time.*	The supplementary information is noted. Our response is set out below.	No change.

		3.24 This vision draws on the need for structural change in our town centres to maintain and enhance vital and viable town centres; the views of those consulted during 2020; and the clear policy direction set out in National Policy and the recently adopted London Plan. *LB Lewisham officer note: Para 3.25 of the submission provides a finer context to this vision, using seven place pillars: rooted, connected, mixed use, multi-cultural, green, healthy and flexible.* 3.33 To achieve this vision, a balanced and flexible approach to planning policies will be required. To achieve a successful ground floor, with active and animated frontages, existing floorspace will have to be removed to make way for new streets and green spaces. Buildings will have to get taller to limit the amount of built footprint at ground floor, creating news spaces that are publicly accessible and engaging, for public benefit.		
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	*LB Lewisham officer note: Chapter 4 of the submitted response provides an overview of national planning policy and London Plan policy with a specific focus on adaption and diversification of town centres and that the changing role of town centres should be proactively managed.* *It also acknowledges the London Plan approach for Lewisham town centre with high residential growth potential, high commercial growth potential protecting small office capacity and strategic night time function and that it forms part of the New Cross/Lewisham/Catford Opportunity Area.* *Landsec supports the following findings within the Mayor's report "Adaptive Strategies for high street renewal" including that there is significant value in London High Streets, the resilience of high streets varies across the city and that high streets are good places for residential intensification.*	The supplementary information is noted. Our response is set out below.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 Soundness	*LB Lewisham officer note: Chapter 6 of the submitted response provides an overview of soundness, that plans should apply a presumption in favour of sustainable development and should seek opportunities to meet development needs of their area and be sufficiently flexible to adapt to rapid change.*	The supplementary information is noted. Our response is set out below.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02	8.1 In accommodating future growth, the Reg 18 Plan allocates a number of sites for development, including Lewisham Shopping Centre (Site Allocation 2). Within this chapter, we comment specifically on the relevant parts of Site Allocation 2 as they are set out in the Reg 18 Plan. **Site Allocation** 8.2 The allocation comprises Lewisham shopping centre, owned by Landsec, and land outside of the Shopping Centre, including Lewisham House, 25 Molesworth Street and Lewisham High Street, which includes Lewisham market. 8.3 Site Allocation 2 is allocated for comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community, and residential uses. 8.4 Landsec support this allocation and whilst the area identified includes more land than Lewisham Shopping Centre, it is felt that this is a positive approach in	Support is noted.	No change.

		securing a comprehensive approach to redevelopment of this important 6.38ha town centre site.		
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02	**Indicative Development Capacity** 8.5 The indicative capacity of the site for 1,579 homes, and gross non-residential floorspace of 20,097 sqm employment and 60,291 sqm main town centre will require further analysis. 8.6 Landsec would like to work with Lewisham Council to inform the indicative capacity of the site further and better link this capacity to the objectively assessed needs; deliverability taking into account other policies of the Reg 18 plan; and the urban design principles being promoted which will naturally break up the existing 100% plot ratio reducing the amount of ground floor that will be available for commercial floorspace. 8.7 The Council's site allocation background paper confirms that the indicative site capacities have been derived from the London-wide SHLAA methodology, rather than a needs assessment, or indeed pre-application discussions. This has assumed that Lewisham town centre (Lewisham shopping centre and immediate surrounds) should reflect the need for provision of a significant amount of main town centre uses within the Primary Shopping Area, also commensurate with the objective for Lewisham to be designated a Metropolitan Centre. As discussed above, this 'potential' objective must be considered in context. Table 7.1 of the background paper assumes a general mix of 60% residential; 30% main town centre; and 10% employment. Appendix A Table A.2 identifies a slightly different capacity mix of 55% residential; 30% main town centre; and 10% employment; and 5% other. 8.8 As this is a significant and complex site, we feel that pre-application discussions represent the most appropriate route to defining indicative site capacity. Whilst SHLAA methodology is a useful starting point, it is a crude land use model which, understandably, is unable to test viability; needs; and site context. 8.9 Our initial assessment is that the indicative residential development capacity for the site (1579 homes) results in an under-utilisation of the site. While the Site allocation background paper confirms that the indicative capacities should not be read prescriptively, they mayunintentionally raise local communities' expectations around the appropriate capacity prior to any design analysis. The actual development capacity of a site will ultimately need to be determined through the detailed design and planning approval process and this should be made clearer in the Reg 18 Plan itself. 8.10 As a PTAL 6 central location, the London Plan encourages much greater residential densification, certainly given the potential for metropolitan status. London Plan Policy H1 'Increasing housing supply' requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites in order to ensure that housing targets are met. Sites within existing or planned PTALs of 3-6 which are located within 800m of a tube or rail station or town centre boundary are identified as key sources of capacity.	At this time, the pre-application is likely to evolve prior to the submission of a planning application, and so cannot be relied upon to provide a design led capacity for this site. In these instances the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including that the site needs to accommodate significant amounts of non-residential floorspace commensurate with its role within the major town centre, the aspiration to become a Metropolitan town centre and the need to transition appropriately in scale down to the established 3-4 storey that exists along Lewisham High Street and nearby Conservation Area. Based on these considerations, the capacity remains appropriate and should remain the same. Optimal capacity for the site will be established at planning application stage through a design led approach.	No change.

		8.11 As the upper end of the former London Plan density matrix (405dph) would equate to 2,584 homes across Site Allocation 2, we would expect the site to achieve more homes to fully optimise housing delivery, and therefore an indicative capacity of 2,584 homes would be more appropriate. 8.12 The London Plan sets out a design-led approach to determining the optimum development capacity of sites. To accommodate the growth identified in this Plan in an inclusive and responsible way, every new development needs to make the most efficient use of land by optimising site capacity. Policy D1 B (3) 'London's form, character and capacity for growth' is clear that boroughs should follow the design-led approach (set out in Policy D3 'Optimising site capacity through the design-led approach') to establish optimised site capacities for site allocations. Landsec welcomes the opportunity to enter discussions to inform this approach. Paragraph 3.3.4 of Policy D3 acknowledges that this should be through a consultative design led approach that allows for meaningful engagement and collaboration with local communities, organisations and businesses. 8.13 With regards to the indicative capacity of 20,097 sqm employment and 60,291 sqm main town centre uses, from our early assessment of future needs, and the Council's own evidence base since 2009, this suggests that there is an oversupply of retail floorspace in Lewisham town centre. We believe that there will need to be an adjustment to these indicative figures. 8.14 There will also need to be an adjustment to reflect urban design principles promoted by the Reg 18 Plan. Lewisham Shopping Centre has a site coverage of 100%. To break the centre up, and create new, green permeable routes, there will need to be a reduction in ground floor commercial floorspace to make way for these routes. Owing to the let ability of commercial floorspace, there may be limited scope to replace this floorspace at upper levels across level 1, 2 or 3 for example as retail floorspace does not operate effectively above the ground floor.		
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02	**Opportunities** 8.15 Landsec agrees that the site forms the heart of Lewisham and will play an important role in the enhancement of the town centre. Landsec also agrees that any redevelopment of the site will require significant upfront infrastructure, for example new public realm and transport connections, subject to phasing, necessity, and viability. 8.16 The site allocation does not reference the viability challenges of incurring significant upfront cost in the early phases of redevelopment and the potential need to explore grant funding opportunities or flexibility in other policy areas to ensure a viable scheme. The Mayor's Affordable Housing & Viability SPG (2017) states "*it is understood that development proposals on particular sites may not be able to meet affordable housing requirements due to the requirements for significant investment in other contributions to support growth, particularly for public transport (but also for schools and hospitals, cultural venues, affordable work space etc.)".*	Agree with some, but not all, of the points raised in relation to the Opportunities text. Do not agree with the words "should seek to" as securing the long-term future of the market is a pre-requisite to re-developing the site. Policy DM2 already provides an approach for dealing with infrastructure funding and seeks planning obligations on a case by	Lewisham Shopping Centre site allocation amended to refine some of the Opportunities text.

		8.17 The viability constraints of Lewisham Shopping Centre and other sites in the borough is clearly set out in the Local Plan Viability Assessment (BNPP, 2019). The testing identifies that the Lewisham Shopping Centre would be able to deliver between 0% and 30% affordable housing dependent on achievable sales values. The viability testing also excludes any site abnormal costs which will significantly impact viability. 8.18 On this basis, Landsec broadly supports the opportunities for development subject to the following. *"This site forms the heart of Lewisham major centre and includes the Lewisham Market. It is dominated by the shopping centre, built in the 1970s, and the Lewisham House office block.* ~~*Renewal and modernisation of the shopping centre, will enhance the quality of town centre and help it to achieve metropolitan centre status*~~*. Comprehensive redevelopment of the site will enhance the quality of the town centre and will help the Council towards its ambition for potential Metropolitan Town Centre status. Through diversification, redevelopment can deliver a significant amount of new housing on upper floors to contribute towards vitality and viability of the town centre.* ~~*together with M*~~*odern retail and employment space, leisure, cultural and community facilities* ~~*to*~~ *will support the long-term vitality and viability of the town centre. Development can also enable transformative public realm enhancements to improve connections throughout the wider town centre area and should seek to secure the long-term future of the market.* *Delivery of significant upfront infrastructure and the placemaking costs associated with redeveloping the town centre may impact the viability of development and the ability to deliver a policy compliant level of affordable housing. The Council will work with developers to explore grant funding opportunities and other policy flexibilities."*	case basis, taking into account necessary mitigation and site viability. The Plan should be read as a whole.	
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02	**Development Guidelines** 8.19 The Council's evidence base demonstrates that the site is an excellent location for tall buildings. It is situated in one of the most suitable and less sensitive locations for tall buildings in the Borough. For this reason, there should be no limit to building heights at this location. 8.20 Landsec therefore propose the following amendments to bullet six: (Bullet six) *"The design of development must respond positively to a site's position in the wider site allocation area, and to the scale and function of the High Street.* ~~*The southern end of the site should operate as a transitional zone with more moderately scaled development*~~*. Comprehensive redevelopment, including the Beatties Building and Model Market, should* ~~*establish a new southern anchor to*~~ *encourage visitors into the heart of the town centre, and help to support pedestrian movement up the length of the High Street. Tall*~~*er*~~ *building*~~*s elements*~~ *may be appropriate across the site but will be encouraged at the northern end of the site and to the west along Molesworth Street."* 8.21 Landsec supports and encourages visitors into the heart of the town centre and pedestrian movement along the High Street. This can be achieved in many ways, and it would be inflexible to promote a new southern anchor to achieve	Agree with some, but not all, of the points raised in relation to bullet six. Agree to remove the text relating to a new southern anchor, in order to provide some flexibility. Disagree that a new bullet needs to be added to the Development Guidelines. The site is located within an Opportunity Area. Opportunity Areas are key sources of housing supply in London. They are, by their nature, complex to bring forward and often require significant investment in	Lewisham Shopping Centre site allocation amended to refine some of the wording for bullet six.

		this. The concept of an anchor is also prescriptive, and following the structural change in town centres, as a concept may no longer be relevant and should therefore be removed. 8.22 Landsec proposes that the challenge of delivering a site in an opportunity area be recognised, aligned to GLA policy. The Mayor's Affordable Housing & Viability SPG states that *"Opportunity Areas and Housing Zones are key sources of housing supply in London. They are, by their nature, complex to bring forward and often require significant investment in infrastructure. They are also of a scale that can create fundamentally new places and communities."* 8.23 The site allocation should provide an element of flexibility to affordable housing provision as set out in the Mayor's Affordable Housing & Viability SPG. The SPG states *"when considering Opportunity Areas, Housing Zones and industrial land, LPAs may wish to apply a localised affordable housing threshold for the Fast-Track Route".* 8.24 Landsec therefore proposes the inclusion of a new bullet point: (Bullet Twelve) *"The site is located within an Opportunity Area. Opportunity Areas are key sources of housing supply in London. They are, by their nature, complex to bring forward and often require significant investment in infrastructure. The Council will take into considerationthe viability challenges of the site when assessing the requirements under affordable housing and other policies."*	infrastructure. Policy DM2 already provides an approach for dealing with infrastructure funding and seeks planning obligations on a case by case basis, taking into account necessary mitigation and site viability. The Plan should be read as a whole.	
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	*LB Lewisham officer note: The submitted response is also accompanied by Appendix 1: Retail tables* - *Table 1a: Population* - *Table 1b: Convenience and Comparison Expenditure per person 2019* - *Table 1c: Convenience and Comparison Expenditure* - *Table 2a: Market Shares and Turnover – Convenience Goods 2020* - *Table 2b: Market Shares and Turnover – Convenience Goods 2021* - *Table 2c: Market Shares and Turnover – Convenience Goods 2025* - *Table 2d: Market Shares and Turnover – Convenience Goods 2030* - *Table 2e: Market Shares and Turnover – Convenience Goods 2035* - *Table 2f: Market Shares and Turnover – Convenience Goods 2040* - *Table 3a: Market Shares and Turnover – Comparison Goods 2020* - *Table 3b: Market Shares and Turnover – Comparison Goods 2021* - *Table 3c: Market Shares and Turnover – Comparison Goods 2025* - *Table 3d: Market Shares and Turnover – Comparison Goods 2030* - *Table 3e: Market Shares and Turnover – Comparison Goods 2035* - *Table 3f: Market Shares and Turnover – Comparison Goods 2040* - *Table 4: Trading Performance of Existing Convenience Floorspace* - *Table 5: Retail Capacity Lewisham Borough (Constant Market Share)* - *Table 6: Retail Capacity Lewisham Town Centre Only (Constant Market Share)*	The supporting information is noted.	No change.
Freeths LLP (K/S Lewisham obo)	General LCA SA 02	K/S is also supportive of the identification of the Site within the wider proposed allocation of the Lewisham Shopping Centre (Site 2 – page 498-499). Although the Site is allocated within this wider town centre allocation, K/S has also submitted the Site's availability for development as part of the Call for Sites consultation. This is to be clear on its suitability and availability for development.	Support noted. Agree that delivery of the site is reliant on the cooperation of all land owners across the site.	No change.

		Due to the position of its Site, K/S is committed to playing its part in the regeneration and redevelopment of the Site based on its availability and development potential. To deliver regeneration in this location, it is essential that the requirements and objectives of all landowners and operators are heard and factored into the policy to ensure it is sufficiently flexible and capable of delivery.		
Freeths LLP (K/S Lewisham obo)	General LCA SA 02	To ensure compliance with the NPPF paragraph 35 soundness requirements and particularly that it is an effective and justified allocation, we identify the following: - Evidence Base justification for the development requirements of the allocation. This does not appear to have been tested via any published feasibility / design evidence and requires greater flexibility. Greater flexibility is also needed to allow short-medium term works to buildings in the masterplan area where they otherwise meet the objectives of the Plan (i.e. re-use /conversion of the upper floors for offices).	Comments noted.	No change.
Freeths LLP (K/S Lewisham obo)	LCA SA 02	**Development Requirements & Evidence Base** We note this allocation is presented based on achieving comprehensive mixed-use development. The opportunity presented by the Site and the allocation is clear and K/S as an important landowner in the allocation is willing and enthusiastic to play its part in working with the Council and Land Securities in delivering the allocation. The Development Requirements outlined in the allocation are detailed and clear in their objectives and requirements. This sets a positive framework for formulating a scheme and promoting development through the planning process. Before the requirements are set and enshrined in the Development Plan, to comply with NPPF paragraph 35 b) it is however important that they are formulated and tested based on a justified and appropriate strategy which has taken into account the reasonable alternatives and based on proportionate evidence. We note that other areas in the Local Plan are based on Opportunity Studies and/or Masterplans (e.g. Catford and New Cross). No Masterplan or Opportunity Study has been prepared by the Council to inform the detailed requirements that are currently proposed. We note the publication of the Draft Tall Buildings Study (Allies and Morrison, February 2021) and the Lewisham Characterisation Study (Allies and Morrison, June 2019). These helpfully identify the allocation area as being capable of intensification including for tall buildings, but neither document provides the direct evidence or link to the actual development requirements proposed for this Site. As a minimum we would expect a companion document to these studies to identify the key development parameters and principles to be used in informing the Site Allocation. These should be tested and then selected based on an assessment of the allocation area and its immediate surroundings together with potential options and alternatives. This is particularly important step in the Evidence Base process where the Allocation extends to such a significant part of the Town Centre and onto plots such as our client's beyond the majority ownerships of the Shopping Centre itself. The guidelines as presently drafted appear to offer the opportunity for increased density and height onto the Shopping Centre elements on the northern	Agree that landowners should work in partnership and in accordance with a masterplan, to ensure the appropriate co-ordination and balance of uses across the site. Policy DM3 already provides an approach for dealing with masterplans and comprehensive development. The Plan should be read as a whole. Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to Policy QD4 Building Heights and the suitability for tall buildings at the Lewisham Shopping Centre site. Agree that this site allocation could be worded more flexibly in relation to tall buildings. Agree that reference should be given to plots of land falling outside of the ownership of Lewisham Shopping Centre and how	Lewisham Shopping Centre site allocation amended to make reference to partnership working, masterplan, Policy DM3, that tall buildings may be appropriate across the site, especially at the north and west of the site and plots of land that do not fall within the ownership of the shopping centre.

			and western parts of the allocation without fairly considering how development and intensification can be located on the central and eastern parts of the allocation including our client's Site. This needs to be more transparently and fairly tested through a clear and robust evidence base to support the selection of the development guidelines and the overall soundness of the allocation. In the absence of such evidence base, the development guidelines need to be more flexibility worded such that the opportunities and options are considered before a development choice is made. Such an option is identified for the Lewisham House block for example but otherwise decisions on taller building locations have been made without consideration and fair assessment. Our client's site is for example strategically positioned in the Site and is capable of accommodating additional height and density to support mixed-use including residential. This can for example provide high quality architecture and active frontages which will offer visual interest and identity to enliven and regenerate this particular part of the High Street. It will also positively link with and engage the market and any associated improvements to the Town Centre's built environment/public realm in this particular location. The potential for this and how the Site can play its part needs to be considered further as part of the evidence base so a clear and sound allocation can be set.	they will be integrated into the wider site allocation. The council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper. Optimal capacity for the site will be established at planning application stage through a design led approach.	
Transport for London Commercial Development	3	LCA SA 06	**6 - Land at Conington Road and Lewisham Road (Tesco)** As stated in the TfL Spatial Planning response Redevelopment of 'Land at Conington Road and Lewisham Road' would require the retention and/or re-provision of the bus stop and stand facility, including driver facilities, which is currently provided within this site allocation.	Agree that existing bus infrastructure should be re-provided.	Land at Conington Road and Lewisham Road (Tesco) site allocation amended by making reference to the re-provision of bus infrastructure.
Tesco Stores Ltd (Lichfields obo)	3 2	LCA SA 06 Para 14.36	**Site Allocation 6 : Land at Conington Road and Lewisham Road (Tesco)** <u>Tesco supports the proposed 1.53 ha site allocation</u> (para 14.36). **Indicative Development Capacity** The site is identified as having an indicative development capacity of 380 net residential dwellings alongside 3,802 sqm of gross employment floorspace and 7,604 sqm of gross main town centre use floorspace, following the '*standard method + sensitivity'* approach explained in the Site Allocations Background Paper (SABP) (at para 6.3, tables 6.1 and 7.1 and Appendix A.1 in particular). We appreciate and agree that the development capacity is indicative and is a matter to be determined through detailed design and planning processes (SABP para 6.2). We anticipate that any replacement retail store would not use all of the indicative main town centre use floorspace capacity indicated. Furthermore, the transitional location of the site (explained at LLP para 14.33) makes it less appropriate for the scale of indicative capacity of other town centre uses and employment uses to reflect other town centre sites. Conversely, we anticipate the indicative residential capacity to be much greater than 380 homes. Your 'standard method' for an Opportunity Area site with a central setting and 5-6b PTAL, indicates a capacity of (1.53 ha x 450 dwellings/ha) 689 homes. We appreciate there are site specific considerations to address,	The pre-application is likely to evolve prior to the submission of a planning application, and so cannot be relied upon to provide a design led capacity for this site. In these instances the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including that the site	Land at Conington Road and Lewisham Road (Tesco) site allocation amended by increasing net residential units to 407 and reducing employment floorspace to 1,901m^2.

			including the retention of vehicular access through to the Conington Road site (SA5), but would expect 600 dwellings to be a more appropriate indicative sensitivity figure. (NB. The current planning status of SA5 is that the SoS granted full planning permission for 365 residential dwellings and associated development in January 2020). We recommend the indicative development capacity is revised accordingly: ***INDICATIVE DEVELOPMENT CAPACITY*** | ***Net residential units*** *380- 600* | ***Gross non-residential floorspace*** *Employment < 3,802* *Main town centre < 7,604*	needs to accommodate a replacement large supermarket, vehicular access and Silk Mills Path, and that it is an edge of centre site that needs to transition appropriately in scale down to the established low rise properties along Conington Road. Based on these considerations, the the amount of employment floorspace and residential has been amended to reflect the transitional nature of the site. Optimal capacity for the site will be established at planning application stage through a design led approach.	
Tesco Stores Ltd (Lichfields obo)	3 2	LCA SA 06 Para 14.37	**Opportunities** Tesco agrees the redevelopment of the Tesco superstore, its car park and petrol-filling station, has the potential to provide a significant number of new homes and non-residential floorspace within a highly sustainable town centre location, one lying in a "*transitional position from the surrounding residential area leading into the heart of Lewisham major centre …*" (para 14.37). Such mixed-use redevelopment would allow for the repurposing of the retail store site, so as to provide an appropriately sized modern replacement foodstore. Accordingly, we recommend the third sentence of para 14 .37 is revised to read: *" Comprehensive redevelopment and intensification, along with the* replacement of the existing retail store or *introduction of a wider range of uses, will provide a more optimal use of land to support the long-term viability of the town centre."*	Agree that a replacement retail store should be accommodated on-site.	Land at Conington Road and Lewisham Road (Tesco) site allocation amended using the wording proposed.
Tesco Stores Ltd (Lichfields obo)	3 2	LCA SA 06 Para 14.39	**Development Requirements and Guidelines** Tesco welcomes the Council's ambition to make the best use of the land available in line with both NPPF (Chapter 11) and the London Plan (Policies GG2 and D3). Tesco concurs with the appropriateness of the SA6 Development Requirements, save for the detail (not the principle) of the last two bullets on public realm and ecology and amenity value. The detailed provision is matter for the Development Guidelines, explaining how the requirements might be achieved, mindful that there will be alternative ways to do so and that is matter to be determined through masterplanning as part of the design and planning processes. Specifically, we recommend: "~~*including*~~ *A new public square linked to Silk Mills Path; River restoration and a riverside walk" and "including a riverside walk incorporating the existing bridges with an attractive and robust embankment"*	Disagree that references to the riverside walk should be moved to the Development Guidelines, as interconnectivity with, and improving, the river is an essential part of redeveloping the site.	No change.

			are removed from Development Requirements para 14.38 and included in Development Guidelines para 14.39.		
Tesco Stores Ltd (Lichfields obo)	3 2	LCA SA 06 Para 14.39	The Development Guidelines (at para 14.39) give some acknowledgement that an appropriate balance will need to be struck with regards to replacement retail parking with the penultimate bullet point noting '*Car parking should be the minimum required, reflecting the high level of public transport accessibility of the site'*. It is however recommended that this bullet point is amended to give greater clarity in relation to parking associated with any replacement large foodstore as follows: "*Car parking should be the minimum required, reflecting the high level of public transport accessibility of the site,* whilst recognising the need to provide appropriate levels of car parking to ensure uses are viable, in particular any replacement retail use.*"*	Comments noted but this text is now proposed for deletion, in order to reduce repetition and ensure clarity in implementing the car parking standards contained in Policy TR4.	All site allocations amended by removing references to car parking.
L&G (Avison Young obo)	- 3	General LCA SA 08	**Representation to Lewisham Local Plan Regulation 18 Stage "Main Issues and Preferred Approaches" (Dated January 2021) – Lewisham Retail Park, Loampit Vale** We write on behalf of our client, L&G, to submit a representation to the London Borough of Lewisham (LBL) in response to Local Plan: Main Issues and Preferred Approaches consultation document (dated January 2021). The consultation period for this document closes on 11th April 2021. This representation is made specifically in relation to the draft Site Allocation 8: Lewisham Retail Park, Loampit Vale. This letter contains an overview of the site and policy context before making representations on the proposed site allocation. **Site Context and Background** The site comprising Lewisham Retail Park is situated to the west of Lewisham Town Centre. At present, the site comprises a retail park with four retail units in a linear terrace and associated car parking. The retail park is bound by the A20 and Loampit Vale, which form part of the TfL Road Network, Thurston Road to the east and Jerrard Street to the west. The site is very well served by public transport and has a PTAL rating of 6b ('Excellent') due to its proximity to Lewisham DLR and train station, and Lewisham Bus Station. The original planning permission for the retail park was granted in 1989 (ref: DC/02/29055). Since this time, there has been a number of applications for amendments to the retail park including signage applications and applications to amend the amount of food retail floorspace permitted. Most recently, planning permission was granted in March 2019 (ref: DC/16/097629) for: *"The comprehensive redevelopment of the Lewisham Retail Park and Nos. 66 – 76 Loampit Vale including the demolition of all buildings on site to facilitate the provision of 4,343sqm of non-residential floorspace comprising (A1) Shops, (A2) Financial & Professional Services, (A3) Restaurants & Cafés, (B1) Business, (D1) Non-Residential Institutions and (D2) Assembly & Leisure uses and 536 residential units in buildings ranging from 4 – 24storeys in height with private and communal*	The supplementary information is noted. Our response is set out below.	No change.

			open spaces, on-site energy centre, car and cycle parking, and associated landscaping and public realm works." The planning permission includes both the Lewisham Retail Park site and nos. 66-77 Loampit Vale which comprise a row of two storey terrace properties. The permission (ref: DC/16/097629) has the following condition attached (Condition 3) which requires the developer to gain control of third party land prior to any works commencing on site: *"No development (other than the Enabling Works) shall be carried out under this permission on any land unless and until all legal and equitable interests in the land at 66-76 Loampit Vale have been bound to the provisions of the S106 agreement and title in respect of such interests has been deduced to the LPA."* Since planning permission was granted, L&G has successfully secured the acquisition of 66 and 76 Loampit Vale and 68 Loampit Vale has been secured under offer. Despite reasonable attempts, L&G has so far been unable to secure the remaining owning interests in Loampit Vale being: • 68 Loampit Vale – Leasehold • 70-72 Loampit Vale – Freehold • 74 Loampit Vale – Freehold L&G has been in discussions with the Council regarding the CPO of the third party land, however due to delays associated with COVID this has not been progressed. Meanwhile, L&G are continuing their efforts to secure the remainder of the units. **Current Policy Position** Within the adopted Lewisham Local Plan, the site falls within the Loampit Vale Policy area as defined in the Lewisham Town Centre Local Plan (LTCLP). As per Policy LTC4, the sites S3a and S3b (which comprise Lewisham Retail Park and the Carpetright site respectively, as shown in Figure 1) have the following site specific requirements: • *"The Council require a comprehensive masterplan endorsed by all landowners for these sites and their surrounds* • Taller elements of new development should address Loampit Vale • *Building lines may need to be set back to accommodate a dedicated bus lane for turning from Loampit Vale into Jerrard Street and the resultant required depth of pavement* • *Accessibility to Lewisham transport interchange should be enhanced wherever possible."* *LB Lewisham officer note: Figure 1: Extract from the Adopted Lewisham Town Centre Local Plan is included in the original representation. It shows the site boundaries located south of Lewisham railway station.*		
L&G (Avison Young obo)	3	LCA SA 08	**Comments on the Local Plan Main Issues and Preferred Approach Document** We welcome the opportunity to comment on the draft Local Plan and particularly the draft site allocations contained within this. Overall, L&G are supportive of the inclusion of the draft site allocation for Lewisham Retail Park, Loampit Vale (site allocation 8) and the principle of redevelopment for this site.	Support noted. Policy DM3 already provides advice regarding site masterplans in relation to not prejudicing the future development of other parts of the site and adjoining land, that there should be a	Lewisham Retail Park site allocation amended to make reference to partnership working, masterplan and Policy DM3.

			We note that the draft site allocation contains different parcels of land within multiple ownerships. This includes: • Lewisham Retail Park – owned by L&G; and • The row of terrace properties at 66-76 Loampit Vale – multiple ownership as set out above. For this reason, we consider the wording of the draft site allocation is overly prescriptive in requiring comprehensive mixed-use redevelopment for the site as a whole. There are a number of practical implications of delivering comprehensive redevelopment for the Site as a whole and as such, we consider the site allocation should be more flexible to allow the two parcels of land to come forward separately. We consider the site allocation should explicitly acknowledge that individual sites within the allocation can come forward within their ownership restrictions, provided that they have the necessary regard to potential future development on adjacent sites. In order to allow this, we suggest the draft site allocation is more akin to the wording of the currently adopted Policy LTC4 which, as above, requires a comprehensive masterplan endorsed by all landowners in relation to the Carpetright site, Lewisham Retail Park and the row of terrace properties at 66-76 Loampit Vale. In light of this, we consider the site allocation should be amended to require mixed-use redevelopment as part of a masterplan approach in conjunction with current owners, where possible. This would ensure that the site could come forward in phases, if necessary owing to land ownership restrictions, without prejudicing adjacent sites from coming forward.	masterplan covering multiple sites in order to demonstrate the acceptability of the scheme both in terms of its immediate and wider context and that there should be active engagement with the landowners and occupiers of the site along with those in other parts of the allocated site. The Plan should be read as a whole.	
L&G (Avison Young obo)	3	LCA SA 08	The draft site allocation includes an indicative development capacity of 536 net residential units. We acknowledge that this reflects the quantum of residential units as part of the extant planning permission for the site (DC/16/097629). However, this planning permission was granted in 2019 and since this time, there has been a shift in policy and more recent development in the vicinity which have changed the surrounding context. Firstly, within the new London Plan there is a move away from prescribed density ranges and a shift towards a more flexible approach to density. This is reflected in Policy D3 which sets out that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. This approach is also reflected in Policy QD6 of the draft Lewisham Local Plan which states development proposals must demonstrate that the design-led approach has been used to optimise a site's capacity. In order to demonstrate a design-led approach has been used to optimise a site's capacity, regard should be had to the site context. Since the original application was granted, there has been a change in the context surrounding the site in terms of the quantum of development and consented building heights. The adjacent Carpetright scheme secured an increase of height to 20 and 35 storeys respectively by way of planning permission DC/19/110610. Further, the former Tesco's car park site at 209 Connington Road (ref DC/17/101621) has planning permission for mixed-use development in buildings up to 34 storeys in height. A design-led approach to density should also take into account the fact that the site is location within an Opportunity Area, Metropolitan Town Centre and has a very high public transport accessibility level (PTAL rating 6b).	The indicative site capacities reflect the latest planning consent that has been granted. In instances where the extant permission will not be implemented, the site allocation capacity has remained the same unless advanced pre-application discussions have been held with regard to an updated scheme. As this is a town centre site, non-residential floorspace will be an essential component of the development, in order to support the long-term vitality and viability of the town centre. Optimal capacity for the site will be established at planning application stage	Lewisham Retail Park site allocation capacities amended to reflect planning consent granted for the site.

			As such, we do not consider that a restrictive quantum of residential units to be delivered on the site is appropriate nor in line with the design-led approach to optimising site capacity as set out in the London Plan and emerging Lewisham Local Plan. There may be potential to further optimise the capacity of the site in line with the new policy approach and this should follow a design-led approach rather than being restricted by the site allocation.	through a design led approach.	
L&G (Avison Young obo)	3	LCA SA 08	The draft site allocation also includes an indicative development capacity for gross non-residential floorspace of 2,171sqm employment floorspace and 2,171sqm main town centre floorspace, which reflects the quantum secured in the extant planning permission. L&G are pleased to see that the requirement for non-residential floorspace reflects the changes to the Use Class Order and specifically the introduction of Class E by allowing for a broad range of main town centre uses on the site. However, since the original planning permission was granted there has been a series of changes in the retail market, particularly more recently due to COVID which has accelerated the decline in interest for large-scale non-food retail. Conversely, there is demand for smaller format food retailing as well as other types of commercial floorspace. Therefore, we do not think it is appropriate for the site allocation to merely reflect the quantum of non-residential floorspace previously consented, but instead introduce flexibility to take into account the changing retail market and ensure that the most economically viable solution for this site can be secured. L&G are broadly supportive of the other development requirements and development guidelines included within the draft site allocation.	Comments noted. Our response is set out above.	No change.
L&G (Avison Young obo)	- 3	General LCA SA 08	**Next Steps** We understand that the comments received as part of this consultation will inform the 'Proposed Submission' version of the Local Plan, which will be published for public consultation (Regulation 19 stage). We look forward to continued engagement with the Council through the Local Plan preparation process. We look forward to confirmation of receipt of these representations at the earliest opportunity. If you have any queries, please do not hesitate to contact us.	Comments noted. Our response is set out above.	No change.
Eden Park Properties (BPTW obo)	- 3	General LCA SA 17	**Re: Representations to the Regulation 18 Lewisham Local Plan** **110-114 Loampit Vale, SE13** BPTW have been instructed by Eden Park Properties to prepare representations to the Regulation 18 Lewisham Local Plan, relating to 110-114 Loampit Vale, SE13. For context, Eden Park Properties are a family run business which place high-quality design at the centre of their developments. The site has been within EPP's ownership for many years, and they now wish to progress and work with the Council on achieving a high-quality development in this location. Following the submission of the site to the Lewisham Call for Sites consultation in October 2018, the site has now gained an allocation within the Regulation 18 draft Plan for a mixed-use redevelopment incorporating main town centre, commercial and residential uses (Allocation 17 at Page 533 of the draft Plan). This allocation of the site is supported and welcomed, and we look forward to	Support noted.	No change.

			working with the Council to deliver much needed high-quality housing alongside employment floorspace in the Borough.		
Eden Park Properties (BPTW obo)	3	LCA SA 17	Notwithstanding this, we consider the full extent of the site's potential has not been recognised within the draft allocation, particularly the number of residential units envisioned (c.29 units). We consider that the site has potential to deliver a high quantum of development than set out within the draft Plan due to the following reasons; • The site is currently an underutilised brownfield site, within a highly sustainable location (i.e. within 200m of Lewisham DLR Station / PTAL of 6B). The need for housing within London has never been greater, and sites such as this one should be fully optimised to support the long-term vitality and viability of Lewisham Town Centre. • The site has few planning designations; the existing buildings on site are not locally nor statutorily listed and the site does not fall within a Conservation Area. Given this, the site represents a prime opportunity to enhance development in this location. • The site is located on the edge of Lewisham Town Centre, therefore is located in close proximity to services and facilities. • There are a number of large-scale regeneration schemes within the immediate surroundings of the site including Thurston Industrial Estate. Most of these schemes are now built out, or are currently under construction and provide a clear precedent for height and massing within the area. The site represents an opportunity to provide a transitional massing between the terraces to the west and the taller buildings to the east. • The principle of development for residential uses was previously supported through the previous application on site (LPA Reference: DC/20/118304). Based on the above, we welcome the Council's conclusion that the site is suited towards a mixed-use development, and to clarify, EPP are committed to re-providing the appropriate employment floorspace on site to achieve the aspirations of the allocation. However, we consider that given the surrounding context of development, and the increasing need for both affordable and market housing within Lewisham, the site should be fully optimised and a higher density development could be supported. *LB Lewisham officer note: a map is included in the original representation showing the boundary of the site.* To conclude, we wish to reiterate that EPP are keen to work with the Council to achieve a mixed-use development in line with the aspirations of the New Lewisham Local Plan at 110-114 Loampit Vale. However, to ensure the scheme is viable and fully optimises this brownfield site, we consider that a higher quantum of development can be provided which still takes into consideration the site's constraints. The site is extremely well connected to public transport and is situated within an area considered suitable for increased development density. The current buildings on site are of low architectural quality, therefore the site offers a prime opportunity to contribute towards meeting the increasing housing targets through the optimisation of a brownfield site.	Where no pre-application discussions have taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the re-provision of some employment floorspace on this non designated employment site but also flexibility to introduce town centre uses and the need to transition in this edge of town centre location by continuing the building line to the west of the railway. Based on these considerations, the residential capacity has only marginally increased by 1 unit, although the mix of land uses has changed. Optimal capacity for the site will be established at planning application stage through a design led approach.	110-114 Loampit Vale site allocation amended by increasing net residential units to 30, reducing employment floorspace to 298m^2 and raising town centre floorspace to 596m$^{2.}$
Eden Park Properties (BPTW obo)	- 3	General	The Council should note that EPP are also committed to delivering development at this site. Since the submission of the Call for Sites form back in October 2018, EPP have been in discussion with BPTW regarding the possible quantum of	Comments noted.	No change.

		LCA SA 17	development on site. Internal discussions have progressed within the Project Team, and EPP now wish to progress towards pre-application within the next month, with the Council. Following this, EPP wish to progress towards a full planning application around Summer 2021. We look forward to working with the Council and delivering the aspirations of the New Local Plan. If you have any queries relating to the representations, then please do not hesitate to get in touch.		
Royal London Mutual Insurance Society Limited (Montagu Evans obo)	- 3	General LCA SA 18	**LEWISHAM LOCAL PLAN – CONSULTATION ON MAIN ISSUE AND PREFERRED APPROACHES (REGULATION 18)** **RAVENSBOURNE RETAIL PARK** On behalf of our client, Royal London Mutual Insurance Society Limited ("RLMIS" / "Client"), we write to submit representations for the "Consultation on Main issues and preferred approaches" (Regulation 18) in relation to Ravensbourne Retail Park (the "Site"). *LB Lewisham officer note: a site location plan is included in Appendix 1 in the original representation.* These representations are in support of the Lewisham Central Area Allocation 18: Ravensbourne Retail Park and we support the site's inclusion in the final Local Plan once adopted for the reasons set out in this letter. Notwithstanding this, we consider that there are further refinements to be made to ensure that the site allocation better reflects the recent shifts in planning policy, as well as the local market.	Support noted. Our response is set out below.	No change.
Royal London Mutual Insurance Society Limited (Montagu Evans obo)	- 3	General LCA SA 18	**Site Context and Background** The Site is located circa 290m north of Bellingham Station. The Site falls outside of the Bromley Road SIL which is located adjacent to the north-western and southern boundaries. The Site also abuts residential development to the north-east, east and west. The Site itself covers an area of 2.71 hectares comprising units one to five of Ravensbourne Retail Park, along with the associated hardstanding car park. These units are currently in use for Retail and Leisure (Gym) purposes totalling 6,729 sqm (GIA), with the split outlined in Figure 1 below. *LB Lewisham officer note: Figure 1: Split of Uses and Areas is included in the original representation. The table lists the retail and leisure uses (GIA sqm) present in the retail park.* The Site is well connected, with good access to public transport, which is reflected by its PTAL rating of 4. The buildings on Site are not listed nor is the Site located in close proximity to any listed buildings. A small section of the eastern part of the Site falls within the Curlverley Green Conservation area. The Site was first put forward in the 2015 call for Sites and was subsequently assessed in the London SHLAA (2017) and by the Lewisham Strategic Planning Team (2019). Following this, the Site was given a draft allocation in the Main	Comments noted. Our response is set out below	No change.

			Issues and Preferred Approaches document (Regulation 18) which these representations are submitted in response to. RLMIS has also met with the Lewisham Regeneration Team to discuss the development potential of the Site.		
Royal London Mutual Insurance Society Limited (Montagu Evans obo)	3	LCA SA 18	**Emerging Allocation - Lewisham Central Area 18: Ravensbourne Retail Park** <u>Principle of the Allocation</u> As explained above, the Site has a draft allocation which these representations have been submitted in support of. The allocation promotes the comprehensive mixed-use development of the retail park comprising residential, main town centre and commercial uses. To support these uses, the allocation includes public realm and environmental enhancements, such as new public open space and river restoration. RLMIS is supportive of the draft uses in principle, along with the aforementioned enhancements. RLMIS is keen to ensure that its vision for the redevelopment of the Site is consistent with the objectives of the emerging allocation, as well as the wider borough and the GLA. Likewise, RLMIS supports the identification of the potential of the Site to deliver new jobs and homes in the early phases of the London Plan. We consider that this would contribute to the delivery of much-needed homes and jobs whilst having a positive impact on the surrounding area. The allocation currently shows an indicative capacity as follows: • 343 Residential Units; and • 12,786 sqm of Main Town Centre Floorspace. Whilst we are supportive of the emerging allocation and the principle of the uses proposed, the draft allocation proposes almost double the amount of town centre use floorspace compared to the existing provision (6,729 sqm). We are of the view that this draft quantum of town centre floorspace is excessive and does not align with national, regional and local objectives. In addition, such provision does not reflect the character of the prevailing area or the local market. Secondly, we are of the view that in light of the shift in planning context, the Site could be further optimised to provide a greater quantum of both market and affordable residential units. We explain this in greater detail below. Following research into the local market, RLMIS has commissioned an architect to undertake a massing and capacity study to establish the Site's redevelopment potential. This study demonstrates that the Site can comfortably deliver circa 750 units (circa 300 DPH), along with approximately 2,000 sqm of town centre uses at the lower levels. The massing of this scheme has been advanced based on initial Sunlight/Daylight testing, along with analysis of the neighbouring buildings and an assessment of the public realm and amenity space. Although we have not submitted the detailed studies as part of these representations, we have included an overview of the draft scheme at Appendix 2.	The pre-application is likely to evolve prior to the submission of a planning application, and so cannot be relied upon to provide a design led capacity for this site. In these instances the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Site Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. We agree that the draft quantum of non-residential floorspace was excessive and we have reduced the employment floorspace element of it accordingly. The indicative capacity has also been tested through the A21 Development Framework that has been endorsed by the council and found that the capacity of residential units is reasonable, taking account of the existing character of the area whilst optimising the site. Optimal capacity for the site will be established at planning application stage through a design led approach. -	Ravensbourne Retail Park site allocation amended to show 367 residential units, 7749m2 gross employment floorspace and 1937m2 gross (-5,719m2 net) town centre floorspace.

			LB Lewisham officer note: Appendix 2: Initial Sketch Proposal is included in the original representation. The sketch shows multiple buildings accommodating 750 new homes and 2,000m2 of non-residential development. We will submit the detailed supporting information to Lewisham Planning Department in order to arrange a pre-application meeting in due course.		
Royal London Mutual Insurance Society Limited (Montagu Evans obo)	3	LCA SA 18	<u>Town Centre Uses</u> Firstly, in terms of the indicative quantum of town centres uses, it is pertinent to note that the Site is not located in a Town Centre and falls outside of the adjacent Bromley Road SIL, with the majority of the surrounding area predominately being used for residential purposes. Of particular relevance to this, in the consultation document, part b of the Central Area place principles (LCA1) points out that new employment development is to be concentrated within town centres and the Bromley Road Strategic Industrial Location. In addition, the London Plan takes a strong "*town centre first*" approach, explaining at paragraph 2.7.1 that: *"Out-of-centre development can be particularly detrimental to town centres, undermining their economic performance, local character, and the accessibility they provide to a broad range of services, and encouraging increased trips by car".* The Plan also explains at paragraph 2.7.5 that: "*Redevelopment of retail and leisure parks to deliver housing intensification is encouraged, as set out in Policy H1 Increasing housing supply. This should not generally result in an increase of retail or leisure floorspace, taking account of the town centres first approach, the sequential approach to town centre uses, and impact assessments where appropriate."* In addition to the above policy context, JLL Retail Agency has undertaken a review of the retail market which has confirmed that retail property in Lewisham is suffering many of the same national oversupply issues. There has been structural change ongoing in the retail sector for over a decade, principally driven by the increasing trend for online shopping. This is resulting in a massive reduction in the requirement by retailers for retail property floorspace. JLL research has estimated (pre-pandemic) that the oversupply requires a reduction of circa 80,000 UK retail units before the supply demand finds its balance again. The COVID crisis has accelerated this change, with a significantly increased demand for online retailing and substantial reduction in the demand for physical retail accommodation. Turning specifically to Ravensbourne Retail Park, the situation is the same. Falling rents reflect the falling demand by tenants who want to rent the space. Tenants are both downsizing their retail footprints and closing stores completely. This has been evidenced on site with the last two lettings being as a result of retail downsizing or closure. Most recently with Harveys going into administration and the new tenant seeking terms at much lower rents. Prior to that, the former	The supplementary information is noted. Our response is set out above. Since the Regulation 18 plan was published, the council has carried out additional studies to consider the impact of Covid-19, including a Town Centres and Retail Study. Findings have informed the Regulation 19 plan.	Ravensbourne Retail Park site allocation amended to reflect a revised land use mix.

			Carpetright unit was let to a health and fitness operator on reduced rental terms, but also with little demand from retailers for the space. This is expected to continue, and whilst tenant failure is still fairly uncommon, we expect tenants to close their stores on lease expiry rather than renegotiate a new lease on similar terms. This situation is unviable for retailers and also for the landlord. Therefore, alternative solutions for the site need to be identified ahead of the leases expiring in 2024. Although we feel that an element of town centre use re-provision is appropriate, we are of the view that given the considerations outlined above, this quantum should be reduced significantly from the current indicative figure to circa 2,000 sqm (which reflects JLL's market research). Instead, town centre uses should be concentrated in town centre locations as stipulated by regional policy and supported by market research. In turn, this would allow an optimum delivery of much needed market/affordable residential development on the Site, which we feel is a more appropriate use, as explained in greater detail below.		
Royal London Mutual Insurance Society Limited (Montagu Evans obo)	3	LCA SA 18	<u>Residential Development</u> As outlined above, we support the principle of residential development which has been included in the draft allocation for the Site. However, we consider that given the shift in planning context, the Site should be further optimised to ensure that it *"makes as much use as possible of previously developed land"* in accordance with Paragraph 117 of the NPPF. From a market perspective, the Site is an exceptional residential location when you consider the transport connectivity, local amenities and lack of competing development. Bellingham station is just a 6-minute walk from the site, with direct services to Central London in less than 30 minutes making it ideal for commuters and working families. Numerous public parks, schools and facilities are located nearby and the site already boasts an attractive green area separating the site from Bromley Road. The River Ravensbourne flows directly west of the site. The surroundings are predominantly residential and would make an ideal neighbourhood for a flourishing new community. New residents would also benefit from their proximity to the amenities of Catford town centre. The scale of the site presents a compelling opportunity to deliver the first major scheme in Catford since the redevelopment of the former Greyhound Stadium. The lack of competing schemes means we would anticipate significant demand in this location from first-time buyers and families. Looking explicitly at housing targets in the Borough, the recently published Annual Monitoring Report 2019-2020 (January 2021) identifies that the Borough has the following Five Year Housing Land Supply: • Housing Supply – 7,359 dwellings • Five Year Housing Target (London Plan 2016) – 6,925 dwellings (1,385 per annum) • Five Year Housing Target + 5% buffer – 7,271 (1,454 per annum) • Five Year Housing Target + 20% buffer – 8,310 (1,662 per annum) • Five Year Housing Land Supply (5% buffer) – **5.06 Years** • Five Year Housing Land Supply (20% buffer) – **4.43 Years**	The supplementary information is noted. Despite an increase in the London Plan housing target, the Regulation 19 Local Plan identifies specific deliverable and developable sites with capacity to meet the Borough's strategic housing target over the plan period. The council can demonstrate a five year housing land supply and has included a Housing Trajectory within the Plan.	Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been amended to remove references to the Local Housing Need (LHN) figure and the standard methodology. Local Plan amended to include an up-to-date Housing Trajectory and five year housing land supply.

			It should be noted that since the above was published the London Plan 2021 was adopted on 2 March 2021. With the Plans adoption, Lewisham's housing target was increased to 1,667 dwellings per annum, which when substituted into the above calculation results in the following: • Five Year Housing Land Supply (5% buffer) – **4.2 Years** • Five Year Housing Land Supply (20% buffer) – **3.6 Years** It is evident that with the adoption of the New London Plan there is increasing pressure on Lewisham to deliver housing, with the new requirement resulting in a lack of a Five Year Housing Land Supply. In addition to this, a revised standardised methodology was published by the government on 16 December 2020, with the updated annual figure for Lewisham being 4,178 dwellings, which further exacerbates housing pressure in the Borough. It is important to note Lewisham's housing targets in the wider London-wide context, for which the Strategic Housing Market Assessment ("SHMA") (that informs the London Plan) identified the need for 66,000 additional homes per year. For the purpose of the London Plan, London is considered as a single housing market area, with a series of complex and interlinked sub-markets (see supporting paragraph 4.1.2). The Mayor recognises that the delivery of homes of this scale will require not just an increase in the applications approved, but also a fundamental transformation in how new homes are delivered. Therefore, it is clear that sustainable, previously developed sites should be maximised in order to meet the increased housing pressures in the borough and wider-London. This is outlined in London Plan Policy GG2 (Making the Best Use of Land) which promotes higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. As previously explained, the Site is well connected to public transport and is also located in close proximity to a mix of services and amenities. Overall, we consider that there is a clear need for the draft allocation to further optimise the Site in order to maximise the quantum of market and affordable residential units that can be delivered, which in turn would help meet growing housing pressures. The massing and capacity study that we have undertaken indicates that circa 750 units are achievable. Not only would this increased quantum better reflect the uses of the prevailing area and the market forces at play, but also align more closely with the recent shift in planning policy which places an emphasis on making best use of previously developed land.		
Royal London Mutual Insurance Society Limited (Montagu Evans obo)	3	LCA SA 18	**Summary** These representations are submitted on behalf of RLMIS in respect of Ravensbourne Retail Park. RLMIS is currently exploring options to redevelop the Site, with the intention of entering into pre-application discussions shortly. As such, we are writing to support the draft Lewisham Central Area Allocation 18 in principle.	The supplementary information is noted. Our response is set out above.	No change.

			However, we consider that there are some tweaks to the quantum necessary in order to more closely align with the shift in planning context and the local market. Firstly, whilst we agree that some level of retail re-provision is suitable, we are of the view that the indicative amount of town centre floorspace is not reflective of the Site's out of town centre location and omission from the Bromley Road SIL. When combined with the market research we have undertaken, this outlines that a reduced provision of town centre uses is more appropriate in this location, with our research suggesting a quantum of 2,000 sqm. As identified by the Council, the Site is suitable for residential development. However, the additional feasibility work that we have undertaken demonstrates that the Site is capable of delivering greater density (circa 750 units), which would align with the NPPF and the shift of regional policy. This would also better contribute to the growing housing targets in Lewisham and wider-London, as well as helping to facilitate the potential for an increased number of affordable units.		
Royal London Mutual Insurance Society Limited (Montagu Evans obo)	3	General LCA SA 18	We welcome the opportunity to discuss the content of these representations further with the London Borough of Lewisham and are keen to be involved in the forthcoming examination process. In the meantime, should you wish to discuss any of the above please do not hesitate to contact us.	Comments noted. Our response is set out above.	No change.
Phoenix Community Housing (BPTW obo)	3	LCA SA 18	18 & 25 – Ravensbourne Retail Park and other SIL Land at Bellingham growth node (Central Area) – PCH offers its support to the inclusion of residential development here as part of the appropriate mix of uses.	Support noted. Agree with mixed uses at Ravensbourne Retail Park but disagree with residential uses at Bromley Road SIL. Co-location can only take place where SIL is released and compensatory provision of SIL is designated elsewhere.	No change.
Tesco Stores Ltd (Lichfields obo)	3 2	LCA SA 19 Para 14.97	**Site Allocation 19: Catford Shopping Centre and Milford Towers** Tesco supports the inclusion of its large supermarket and the adjoining multi-storey car park within the 3.42 ha site allocation (para 14.96), comprising compatible retail, leisure, commercial, community and residential uses. **Opportunity** Tesco agrees that the site forms the heart of the Catford Major Centre and that its transformation should *"act as a major catalyst for regeneration, as part of a comprehensive masterplan framework"* (LLP para 14.97). The existing Tesco supermarket provides an anchor role within the existing shopping centre, helping to drive footfall into the centre. As such the provision of a modern replacement store, better integrated within the wider town centre,	Support noted. Agree that a replacement retail store should be referenced in the policy.	Catford Shopping Centre and Milford Towers site allocation be amended by referencing a replacement large supermarket.

			should be a key component of the successful regeneration of the site. The draft allocation currently lacks an explicit reference to this, notwithstanding that the Catford Town Centre Framework (Oct 2020) (CTCF) makes several references to the retention of the anchor foodstore. We therefore suggest that the penultimate sentence of the para 14.97 be amended as follows: "*Comprehensive redevelopment will deliver a significant amount of new housing together with modern retail* (including a replacement large supermarket) *and employment space, leisure, community and cultural facilities to support long term vitality and viability, and reinforce its role as a civic and cultural hub."*		
Tesco Stores Ltd (Lichfields obo)	3 2	LCA SA 19 Para 14..49	**Development Requirements and Guidelines** Tesco note that the Site Allocation Development Requirements (para 14.98) state that redevelopment of the site "*must be in accordance with the Catford Town Centre Masterplan".* That cannot be a requirement of new development if the Masterplan is not part of the LLP and its formal consultation process. This should, we recommend, be a (the first) Development Guideline instead: one indicating "*Development* should *be delivered* in accordance with the principles *of the Catford Town Centre Masterplan"*. It is understood that the CTCF represents an early draft of this Masterplan. That Framework includes multiple references to the retention of an anchor foodstore, including (at para 3.7.4) that the "*central location and relatively large plot sizes make the Lanes a suitable location for…. an improved anchor food store to serve existing and new residents."* We therefore suggest that the fourth bullet point of the Development Guidelines (at para 14.99) be revised to read: *"Buildings should provide for a range of footprint sizes to accommodate a variety of town centre commercial and community uses,* including a replacement large supermarket*, and be designed to provide flexibility to enable subdivision of units."*	Disagree that text relating to Catford Town Centre Masterplan should be amended or swapped from Development Requirements to Development Guidelines. Agree that a replacement large supermarket should be referenced in the site allocation.	Catford Shopping Centre and Milford Towers site allocation amended by referencing a replacement large supermarket.
Tesco Stores Ltd (Lichfields obo)	3 2	LCA SA 19 Para 14..49	The Development Guidelines (at para 14.99) note that '*Car parking should be the minimum required to maintain the viability of the town centre, whilst also reflecting the high level of public transport accessibility'.* Tesco notes that the CTCF includes indicative layouts and cross sections (on pages 78 and 80) that show a large foodstore with a pedestrian entrance facing Rushey Green and lower ground level car parking accessed from Holbeach Road. To provide clarity and consistent with the CTCF approach, we suggest this Development Guideline is revised as follows: *"Car parking should be the minimum required to maintain the viability of the town centre, including that of any replacement large supermarket, whilst also reflecting the high level of public transport accessibility."*	Comments noted but this text is now proposed for deletion, in order to reduce repetition and ensure clarity in implementing the car parking standards contained in Policy TR4.	All site allocations amended by removing references to car parking.
Barratt London and the Church Commissioners (Avison Young obo)	- 3	General LCA SA 20	**Representation to Lewisham Local Plan Regulation 18 Stage "Main Issues and Preferred Approaches" (Dated January 2021)** **Barratt London and the Church Commissioners** We write on behalf of Barratt London and the Church Commissioners in representation to the Lewisham Local Plan Regulation 18 Stage "Main Issues and	Support and comments noted. Our response is set out below.	No change.

			Preferred Approaches" (Dated January 2021). This document was published for consultation by the London Borough of Lewisham (LBL) in January 2021. Broadly, Barratt London and the Church Commissioners support LBL's aspiration to proactively respond to population growth and help to meet London's housing need by positively managing the delivery of new homes across the Borough, and through ensuring that town centres support growth, including in retail, business and cultural activities. We have identified a number points following review of the Main Issues and Preferred Approaches Document which we set out below. We request that LBL consider these matters during the future consultation and preparation stages of its new Local Plan. **Context of Representation** Barratt London and the Church Commissioners are in the process of working together to jointly prepare redevelopment proposals for the Plassy Island site within the east of Catford Town Centre (please see appended Location Plan for further details). Initial pre-application discussions have been held with Planning Officers. Given that the Plassy Island site comprises an important strategic and brownfield redevelopment opportunity within Catford Town Centre (as identified within the current Draft Catford Town Centre Framework (CTCF)), the emerging Local Plan is hugely relevant to Barratt London and the Church Commissioners' development aspirations at this stage. **Comments on Local Plan Main Issues and Preferred Approaches Document** We set out a series of comments below concerning various sections of the Local Plan Main Issues and Preferred Approaches document for your consideration. We follow the general order of topics within the document and respond to pertinent points of particular relevance to our client.		
Barratt London and the Church Commissioners (Avison Young obo)	- 3	General LCA SA 20	**Next Steps** We would like to thank you for the opportunity to be involved in the ongoing preparation of the Local Plan. We trust that the above comments are clear and helpful. We request that we are kept updated concerning any future consultation stages concerning the Local Plan document. Please do not hesitate to contact us should you require any additional details, or should you wish to discuss any of the above, at this stage.	Comments noted. Our response is set out below.	No change.
Barratt London and the Church Commissioners (Avison Young obo)	3	LCA SA 20	**Chapter 14 Lewisham's Central Area** **Site Allocation 20. Plassy Road Island Site** Barratt London and the Church Commissioners strongly support the principle of mixed use, residential-led development on the Site. We consider the Site to be an integral and important redevelopment opportunity within Catford Town Centre which will ultimately be key to delivering sustainable and long-lasting regeneration benefits locally.	Support noted. Part 3 of the Plan already specifies that they are indicative capacities and that optimal capacity for the site will be established at planning application	Catford Island site allocation amended to make reference to tall buildings.

			The indicative development capacity of 602 residential units, 6,206 sqm of employment and 6,206sqm main town centre uses provides useful context, however, we request the allocation clearly acknowledge that these figures are indicative only, and that the '*final development quantum should be determined through a design-led approach to make the best use of land and optimise development in accordance with the Council's Draft Local Plan Policy QD6 and London Plan Policy D3'*. This approach will ensure that the future development proposals deliver an appropriate level of development for the Site, taking account of the existing and emerging context of the town centre, contributing to its vitality and viability, and the Borough's housing target. In addition, this will provide flexibility for the design to develop in consultation with planning, design and highways officers at pre-application stage. The development requirements for the draft allocation set out that development must be delivered in accordance with the Catford Town Centre Masterplan. The Draft Catford Town Centre Framework (September 2020) indicates the Site is earmarked for delivery of high-density development including a centrally located taller marker building. We request the draft allocation is amended to refer to this established principle of a taller central marker building, to help ensure consistency between these policy documents.	stage through a design led approach. Agree that a taller building should be located centrally.	
Transport for London Commercial Development	3	LCA SA 20	**20 - Plassy Road Island** Lewisham Council's site allocation of 'Plassy Road Island', at present, includes several TfL-owned landholdings including 1 – 19 Sangley Road, and 14 (a/b) Brownhill Road. TfL CD recommend that the site allocation boundary be extended to incorporate TfL's landholding at '201 - 205 Rushey Green' – see image below for TfL landholdings. You should note that the Plassy Road Island site is bounded by TLRN, namely parts of Brownhill Road, Plassy Road, Sangley Road and Rushey Green. *LB Lewisham officer note: a map showing TFL's landholdings in the vicinity of the Catford Island site is included in the original representation.*	Comments noted. Following the Regulation 18 consultation, the site allocation boundary has been re-visited.	Catford Island site allocation boundary has been amended to include TFL owned land at 201-205 Rushey Green (corner plot of Rushey Green and Sangley Road).
Canada Life Ltd (Williams Gallagher obo)	- 3	General LCA SA 22	Williams Gallagher Gallagher act for Canada Life Limited and are instructed to provide comments to the Lewisham Local Plan Regulation 18 Consultation. I would be grateful for confirmation of receipt of these comments. Canada Life owns a large part of Site Allocation 22 (Wickes and Halfords, Catford Road) and have been in dialogue with Lewisham Council to confirm our general support for the development principles set out within the Catford Masterplan and which are in turn reflected within Site Allocation 22 of the Lewisham Local Plan. However, by email dated 5th March 2021 we raised the following matters which the emerging Catford Masterplan and also the emerging Lewisham Plan should take into account:	Comments noted.	No change.
Canada Life Ltd (Williams Gallagher obo)	3	LCA SA 22	*"Having reviewed the draft document, we wanted to raise some minor points which it would be helpful if the Masterplanning team could take into consideration. We are supportive of the general approach set out in the Masterplan and note that it will be used as evidence to the emerging replacement Lewisham Local Plan which is currently out for Regulation 18 Consultation until 11th April 2021.*	The site allocation already provides flexibility. The Development Guidelines state that development *should maximise*	Local Plan amended to make reference to the updated Use Classes.

			Catford Town Centre Framework 2020 Comments: • *p105 - The potential to uncover the Ravensbourne River is supported. However, at this time there is no information to confirm that the statutory bodies for the river support this approach nor has there been a viability exercise to assess the costs of the works. Our client has instructed an engineering consultancy to review both matters and we will report back to the council once the information is available. We do therefore consider that at this stage there should be recognition in the Masterplan principles that if the opening up of the river cannot be achieved due to restrictions by statutory bodies or it is makes development unviable (through robust viability assessment) it will not then be a pre-requisite of the scheme. To be clear, we do consider opening up the river is an important and integral part of the placemaking principles for the site meaning it should only fall away as a pre-requisite where the landowner and council have explored all reasonable solutions to secure delivery.* • *P106 - The key on the building heights plan does not reflect the colouring on the plan. We believe the dark blue would logically be the 17-20 storey annotation and the colour grading should be corrected in the legend.* • *p107 - The annotation on the lower level uses need to be updated to reflect the new E Use Class and its associated sub categories (a)-(e) excluding E(g)(iii) industrial processes. A5 would also still need to be included as this is not covered by the Class E."* In summary, Canada Life is in the process of assessing the costs associated with deculverting the Ravensbourne River and meeting all other policy requirements for delivery of the emerging Local Plan - including reducing flood risk, safe emergency planning and biodiversity gains. The policy should therefore recognise that if de-culverting the river is not physically / technically possible / viable, this would not preclude the delivery of the site for a high density, residential led mixed-use community.	opportunities to enhance the river, *including* (but not restricted to) de-culverting.	
(Avison Young obo)	- 3	General LCA SA 25	**LEWISHAM LOCAL PLAN: REGULATION 18 CONSULTATION: WRITTEN REPRESENTATIONS** **OBO FRANK GRIFFITHS** These representations are made on behalf of our client, Frank Griffiths, in relation to the Regulation 18 Local Plan Consultation: Main Issues and Preferred Approach to Proposed Changes to the Adopted Policies Map being undertaken by the London Borough of Lewisham. The consultation material comprises: • Local Plan: Main Issues and Preferred Approaches; • Proposed Changes to the Adopted Policies Map; • Integrated Impact Assessment and Non-Technical Summary; • Habitats Regulation Assessment; • Draft Infrastructure Delivery Plan; and • Relevant Evidence Base, including the Employment Land Review (2019), Site Allocations background paper (2021) and Residential Density Technical Paper (2020). These representations do not intend to respond to all of the policies proposed in the draft Local Plan, rather those that are relevant to the proposed development site at this stage, in particular; • Site Allocation 25: Land at Randlesdown Road and Bromley Road; and	Comments noted. Our response is set out below.	No change.

			• Draft Policy EC2: Protecting Employment Sites and Delivering New Workspace.		
(Avison Young obo)	- 3	General LCA SA 25	**Site Context** The site is located at the junction of Randlesdown Road and Bromley Road, Lewisham. It comprises a number of existing buildings and uses as set out in Table 1, below. *LB Lewisham officer note: Table 1: Existing uses at Randlesdown Road is included in the original representation. It lists the categories of use that current exist on the site.* The site is well contained at present. It is bordered: • to the north by Stagecoach Catford Garage (a storage facility for Stagecoach buses) with Bromley Retail Park and residential development beyond; • to the east by the A21, beyond which is a parade of shops and existing residential dwellings; • to the south by a parade of shops adjacent to Randlesdown Road; and • to the west by the Ravensbourne River and Franthorne Way, which provides access to the Bellingham Trading Estate. The shop frontage along Randlesdown Road is located outside of the site boundary. We note that this is being excluded from the proposed SIL designation as per the consultation material, however part of this frontage is within the same ownership and should be included within the Allocation accordingly. *LB Lewisham officer note: Appendix 1 site plan is included in the original representation. It includes land which has not been included within the draft proposed Allocation area.* The site is currently accessed from the A21, or alternatively, access can be taken from Franthorne Way via an existing service yard. The frontage of the site is approximately 200m away from Bellingham Train Station (equivalent to a 5-minute walk). The site is located less than 100m from the Bellingham Road bus stop (north) which provides access to a number of services including 54, 136, 208, 320, N136 and N199. Bellingham Road bus stop (south) is located approximately 100m to the site frontage and provides access to the same level of services. The site has a PTAL rating of 4. There are no statutory listed historic assets within, or adjacent, to the site boundary. The nearest heritage assets are approximately 100m to the west and include the Fellowship Inn Pub and attached hall (Grade II), together with a number of residential dwellings to the south east (Grade II). The proposed development is unlikely to result in adverse impacts on these heritage assets. The site is located in Flood Zone 2 and is therefore subject to a medium probability of flooding.	Comments noted. Our response is set out below.	No change.
(Avison Young obo)	-	General	**Planning History** *The proposed development site's planning history is detailed in the **Appendix II**.*	The supplementary information is noted.	Randlesdown Road and Bromley Road site

	3	LCA SA 25	The planning history of the site includes three development proposals which have been through two appeal processes. In August 2013, the land at 202 – 210 Bromley Road was subject to an appeal (APP/C5690/A/13/2192356) against the Council refusal to grant planning permission in January 2013 (DC/12/080231/X) for the redevelopment of part of the site for a hotel. In conclusion, the Inspector stated that the development would not harm the future redevelopment of the bus garage, but that the development would harm the supply of industrial land within the Borough. It was noted that the redevelopment for existing land values and development costs refurbishment of the existing buildings or re-development for industrial or storage purposes is not viable. A subsequent appeal process concluded in June 2015 (APP/C5690/A/14/2223342 and APP/C5690/A/14/2223348) against the Council's refusal to grant planning permission in May 2014 and June 2014 for hotel (DC/14/86542) and residential-led (DC/14/87384) developments respectively. In conclusion, the Inspector states that the development would not be undertaken as part of strategically co-ordinated release from SIL and that the whole range of potential employment uses of the site had not been tested – albeit that five scenarios for employment re-development had been shown to be non-viable. We are also aware that the site has been subject to pre-application advice from Lewisham in respect of its redevelopment to provide an intensification of SIL floorspace, with residential units above (Pre-application Reference: PRE/17/100975). The proposed scheme intended to provide 115 residential units of 4-10 storeys, with parking under a podium, together with 850 sqm of SIL compatible spaces, artists workshops, SME offices. The represented an uplift of 75sqm of SIL floorspace. Lewisham concluded that the development site had a high occupancy level, indicating that it is meeting an identified need and there is ongoing demand for commercial premises in this location. Further, that the site is providing employment and contributing to meeting the Borough's and London's economic needs in a sustainable location. Nevertheless, the then London Plan and the adopted Lewisham Local Plan did not support residential development on SIL, a position that has subsequently changed. Furthermore, the Council has subsequently commissioned an Employment Land Review which concludes that the site is poor quality and could be redeveloped.	Mixed-use development is not suitable or deliverable on this designated SIL, as there has been no comprehensive approach to warrant the release of this SIL and no compensatory SIL is being provided elsewhere. Residential use on this site would also compromise the operational use of the adjacent bus garage. The Council is supportive of redeveloping the site for non-residential uses, appropriate to its SIL designation.	allocation has been removed from the Plan.
(Avison Young obo)	- -	General LCA SA 25	**Planning Policy Context** *National Planning Policy Framework (NPPF) (2019)* The NPPF (2019) sets out the purpose of the planning system, that is to contribute to the achievement of sustainable development. This will be met through three overarching objectives, which are interdependent of each other:	The supplementary information is noted. Our response is set out above.	No change.

			a. *"**an economic objective –** to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;* b. ***a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and* c. ***an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."* Chapter 3 of the NPPF states that the planning system should be genuinely plan-led and that up-to-date development plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic social and environmental priorities; and a platform for local people to shape their surroundings. Paragraph 31 confirms that the preparation and review of all planning policies should be underpinned by relevant and up-to-date evidence: *"This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."* Paragraph 35 confirms the examination tests which will be applied to new Local Plans and spatial development strategies to ensure they have been prepared in accordance with legal and procedural requirements. Plans will be found 'sound' if they are: • ***"Positively prepared** – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;* • ***Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;* • ***Effective –** deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and* • ***Consistent with national policy –** enabling the delivery of sustainable development in accordance with the policies in this Framework."* Paragraph 36 confirms that these tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area. Chapter 5 of the NPPF (2019) supports the Government's objective of significantly boosting the supply of homes. It confirms, that in order to do this *"it is important that a sufficient amount and variety of land can come forward where it is needed"* (Paragraph 59). Further, Paragraph 67 confirms that *"Strategic*		

			policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking account of their availability, suitability and likely economic viability." Chapter 6 of the NPPF (2019) supports planning policies and decisions that help create the conditions in which businesses can invest, expand and adapt. Chapter 8 supports the promotion of sustainable transport, noting that *"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:* *a. Appropriate opportunities to promote sustainable transport modes can be – or have been taken up, given the type of development and its location;* *b. Safe and suitable access to the site can be achieved for all users; and* *c. Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable level."* Chapter 11 considers how to make the most efficient use of land. Paragraph 118 confirms that policies should give sustainable weight to the value of using suitable brownfield land within settlements for homes and other identified needs. It also promotes the development of underutilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively. Paragraph 120 states that policies *"need to reflect changes in the demand for land. Inter alia, where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:* *a. They should as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate deallocate a site which is underdeveloped);* *and* *b. In the interim, prior to updating the plan, applications for alternative uses on the land should be supported where the proposed use would contribute to meeting an unmet need for development in the area."*		
(Avison Young obo)	- 3	General LCA SA 25	*Planning Practice Guidance* The NPPF (2019) is underpinned by the Planning Practice Guidance (PPG). It was first published in 2012 as an online resource and has been updated in line with recent iterations of the adopted Framework. Paragraph 34 of the 'Plan-making' Guidance (Reference ID: 61-039-20190315) confirms that authorities should prepare their local plans to address future needs and opportunities for their area, explore and identify options for addressing growth and then set out a preferred approach. The 'Plan-making' Guidance provides further direction on assessing the suitability, availability and achievability of potential developments sites so as to	The supplementary information is noted. Our response is set out above.	No change.

			understand whether it can be considered for allocation and would be deliverable over the Plan period. This is expanded within the 'Housing and economic land availability assessment' Guidance. This sets out the criteria for making a judgement as to whether a site can be considered deliverable within the next five years, or developable over a longer period. The PPG is important when considering site specific allocations, as we discuss in our representations below.		
(Avison Young obo)	- 3	General LCA SA 25	*Strategic Policy - London Plan 2021* The London Plan was adopted in March 2021 and provides the strategic planning framework for development within London and the Greater London Area. The Plan considers good growth; spatial development patterns; design; housing; social infrastructure; economy; heritage and culture; green infrastructure and natural environment; sustainable infrastructure; and transport. With regards to employment and commercial land (including industrial, logistics and other services to support London's economic function), the London Plan confirms at Policy E4 the three tiers for these uses which Local Authority's should bear in mind during the plan making process. These include: • Strategic Industrial Locations (SIL) • Locally Significant Industrial Sites (LSIS) • Non-Designated Industrial Sites Policy E5 confirms Strategic Industrial Locations (SILs) should be "managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy." Furthermore, the policy wording confirms that opportunities through the plan-making process for the intensification of SIL and co-location of alternative uses should be explored. Policy E7 provides the policy support for the intensification of SIL, noting that Development Plans should encourage the intensification of business uses. The policy wording confirms that *"Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal."* The London Plan therefore promotes and supports the intensification of alternative uses at SIL locations across the Boroughs. It is noted that the intensification of uses should not compromise the industrial and related activities on-site and in surrounding part of the SIL. Figure 6.2 provides a simplified illustration of the approach to the intensification and co-location of alternative uses at SIL (see overleaf). The "After Intensification" section demonstrates how residential uses can be introduced alongside Class B uses such as commercial, B1c and B8 uses.	The supplementary information is noted. Our response is set out above.	No change.

			LB Lewisham officer note: Figure 1: London Plan 2021 approaches to SIL Intensification is included in the original representation. The diagrams show how to intensify sites.		
(Avison Young obo)	- 3	General LCA SA 25	*Local Plan: Main Issues Document 2021* Lewisham's Draft Local Plan sets out a shared vision for the future of Lewisham, together with the planning and investment framework to support its delivery through to 2040. The main objective of the Plan is to achieve 'An Open Lewisham as part of an Open London', reflecting the Council's commitment to positively manage growth. The aspirations of the new Local Plan are to respond to significant changes to the wider planning context, including the adopted of the NPPF (2019) and London Plan (2021); respond to the climate change emergency; realise the objective of an Open Lewisham; meet local needs for genuinely affordable housing, jobs and community facilities; and secure the delivery of the Bakerloo Line extension. Part Two of the Local Plan forms a key part of the Council's approach to managing new development across the Borough. It includes policies that will help to facilitate the delivery of Good Growth whilst ensuring Lewisham's distinctness is recognised.	Comments noted. Our response is set out above.	No change.
(Avison Young obo)	3	LCA SA 25	The proposed development site comprises Allocation 25: Land at Randlesdown Road and Bromley Road. This encompasses only part of the wider Bromley Road SIL. The allocation wording confirms the indicative development capacity as being 0 residential units, 3,780sqm gross employment non residential floorspace and 945sqm gross main town centre uses floorspace. The policy wording confirms the current use of the site as being industrial and does not acknowledge the existing residential use on the site, nor the detail of the uses on each of the plots. The supporting text confirms that development must not result in the net loss of industrial capacity, or compromise the functional integrity of the employment location in line with Policy EC2; commercial and industrial uses must be the principal use, supported by ancillary main town centre uses appropriate to the industrial location; development must be delivered in accordance with the A21 Corridor Intensification and Development SPD; form positive frontage along Bromley Road and Randlesdown Road; and deliver new and improved public realm in accordance with a site-wide public realm strategy, including public realm enhancements along Bromley Road and Randlesdown Road.	Comments noted. Our response is set out above.	No change.
(Avison Young obo)	3	LCA SA 25	In the first instance, the Allocation must detail the current uses on site including the 4no. C3 residential units. Furthermore, the draft wording of Policy EC2 is out of date, having been superseded by the omission of the 'no net loss' principle from the adopted London Plan (2021).	Comments noted. Our response is set out above.	No change.
(Avison Young obo)	- 3	General LCA SA 25	*Lewisham's 5 Year Housing Land Position* The Council's 5 Year Housing land Supply position is confirmed in the Council's Authority Monitoring Report (January 2021). Paragraph 2.7.7 identifies the Council's committed housing supply that is likely to come forward in the next five years and assesses whether this will be sufficient to meet Lewisham's identified house requirement. Major and strategic sites, together with small windfalls are likely to provide 7,359 dwellings. Table 6 considers whether this is sufficient to meet the adopted London Plan (2016) targets of 6,925 over five years (1,385 per annum). Table 6 is replicated	Despite an increase in the London Plan housing target, the Regulation 19 Local Plan identifies specific deliverable and developable sites with capacity to meet the Borough's strategic housing target over the plan period. The council	Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been amended to remove references to

			below for ease of reference and demonstrates that the Council's land supply reduces as the proposed buffers (set out in the NPPF, in line with previous delivery) increase. *LB Lewisham officer note: Figure 3: Lewisham AMR Housing Supply against London Plan (2016) target is included in the original representation. It shows the number of deliverable years against varying buffers.* The Council's land supply position is assessed against the previous version of the London Plan. The new London Plan (2021) confirms the Council's 10-year housing delivery targets as being 16,670 dwellings. This equates to 1,667 dwellings per year, an increase of 282 dwellings against the previous target. This will therefore reduce the Council's land supply position below the figures stated. In addition, we note that the Housing Delivery Test measurements indicate a score of 88% for Lewisham over the past 3 years. As a result of this score the Council are required to prepare an Action Plan. Our analysis of the Council's draft housing policies and current 5 year housing land supply position confirms, there is a significant need to identify further sites for housing delivery within the emerging policy context, supported by the intensification of existing sites and co-location of uses.	can demonstrate a five year housing land supply and has included a Housing Trajectory within the Plan. A Housing Delivery Test Action Plan was published in July 2021 and will be updated during Summer 2022.	the Local Housing Need (LHN) figure and the standard methodology. Local Plan amended to include an up-to-date Housing Trajectory and five year housing land supply.
(Avison Young obo)	- 3	General LCA SA 25	We would like to thank the Borough Council for the opportunity to comment of the Regulation 18 version of the Local Plan and would welcome continued engagement with the Council in respect of the proposed development site and plan-making process. Please could you confirm receipt of these representations at the earliest opportunity. Should you required any further information in relation to the site and / or the comments made in these representations then please do not hesitate to contact me	Comments noted. Our response is set out above.	No change.
(Avison Young obo)	3	LCA SA 25	*Conclusions* The sites planning history and discussions with our client confirm the existing uses on site range from those included with Class B supported by appropriate Sui Generis uses, together with existing residential (Class C3) uses. The principle of co-locating commercial uses and residential uses as set out in the London Plan 2021 (see below) is therefore already established and are a material consideration in any future Allocation. Our review of the site's planning history, namely the appeal decision relevant to the site, demonstrate that: • Given the existing land values and development costs refurbishment of the existing buildings or re-development solely for industrial or storage purposes is not viable. • The principle of intensified Class C development would not compromise the principle future re-development of the adjoining Catford Bus Garage. In this regard, intensified Class C development would not stymie development of the adjoining site.	The supplementary information is noted. Our response is set out above.	No change.

			In addition to the above, it should be noted that the strategic policy has been updated since the consideration and determination of these applications, which were decided at a time when the colocation of uses was not permitted. The London Plan 2021 strongly supports these principles in order to deliver the identified growth required across the London Borough's.		
(Avison Young obo)	3	LCA SA 25	*Site Allocation – Main Town Centre Uses* The Council includes town centre uses within the draft Site Allocation and has suggested that these are necessary for a 'continuous commercial / shopping frontage at the Bellingham station approach'. It is assumed that the inclusion of main town centre uses refers to 'other compatible uses' as explained in Policy EC2 D. The inclusion of town centre uses in the draft Site Allocation is consistent with the requirements of Policies E5 and E7 of the London Plan. However, the inclusions of residential uses are given the same weight as main town centre uses in the aforementioned policies. Given that there is no differentiation in principle, the draft Site Allocation should be revised to include the potential for main town centre uses and / or residential uses on this site. Notwithstanding this, the inclusion of main town centre uses in the Allocation is inconsistent with the Employment Land Review conclusions which itself is inconsistent with its commentary and conclusions for the site.	Comments noted. Our response is set out above.	No change.
(Avison Young obo)	3	LCA SA 25	**Site Allocation Methodology** In combination with the Site Allocations background paper (2021), the PPG (Plan-making and Housing and economic land availability assessment) provides the basis for examining the proposed development site's suitability for inclusion within the draft policy wording. The Site Allocations background paper (2021) provides further 'screening criteria' in Table 5.1 and the criteria are integrated below *Existing site allocation or consented scheme* The site does not have an existing allocation nor a consented scheme. *Site Size* The site is at least 0.25 hectares and is considered strategic in size. The Allocation area is currently incorrectly drafted and should be amended to include 4 Randlesdown Road. For clarification, the extent of the site boundary is included in **Appendix I**. <u>Suitability</u> Paragraph 18 of the PPG states that: *"A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated."* The guidance goes on to state that the following can inform plan-making decisions for allocating sites, including: • National planning policy; • Appropriateness and likely market attractiveness for the type of development proposed; • Contribution to regeneration priority areas;	The supplementary information is noted. Our response is set out above.	No change.

			• Potential impacts including the effect upon landscape features, nature and heritage conservation. In the first instance, the proposed approach to development at the land north of Randlesdown Road (our client's site) is compliant with the NPPF with regard to sustainable development, namely the re-use of brownfield sites to meet future development needs. As we set out in the planning policy context section of these representations, the Framework identifies a holistic approach to sustainable development as a core purpose of the planning system. It requires the system to perform three distinct and interrelated roles: economic, social and environmental. Our planning policy assessment further identifies the NPPF's aspiration to support sustainable development which seeks to provide a choice of high-quality homes, support the continued growth of the economy, and improve the conditions in which people live and enjoy leisure through high quality design. Section 11 states that it is a core planning principle to efficiently reuse land which has previously been developed, promote an effective use of land in meeting the identified growth needs of an authority area. *Employment Land* The continued employment and commercial uses at our client's site are no longer suitable, given their size, viability and condition. They are considered to be of poor-quality stock to the remainder of the Bromley Road SIL (see the conclusions drawn in the Employment Land Study, 2019). Para. 5.32 of the Employment Land Review states that a masterplanned approach to the site could see a carefully planned mixed use development safeguarding this area for employment. However, there are no reasonable option for refurbishing or redevelopment the employment uses on site as this is unviable (as demonstrated in the relevant appeals (APP/C5690/A/13/2192356 and APP/C5690/A/14/2223342). To secure the re-development of the site for employment generating use, the appropriate policy wording drafted in the emerging Local Plan (Policy EC2 and Allocation 25) would need to be updated to positively reflect the co-location of residential uses at this site. This is directed by the London Plan. Indeed, the approach to the intensification and co-location of alternative uses at SIL, as demonstrated in Figure 6.2 of the recently adopted London Plan is entirely characteristic of the development site, given the proximity to other non-employment uses, at the edge of a wider SIL designation and in close proximity to a public transport link, i.e. Bellingham rail station. The reference to the 'net loss of industrial capacity' has been removed from the adopted London Plan and instead the direction of the Allocation should be towards ensuring the functional integrity of the SIL is maintained with compatible residential accommodation. This principle can be achieved through the protection afforded the SIL area not within the Site Allocation, i.e. this can come forward for intensification throughout the plan period, but for the Site Allocation to consolidate industrial uses within a mixed-use redevelopment.		

			Furthermore, the principle of these uses has already been established by virtue of 4 residential dwelling forming part of the existing permitted uses at the site. Our client is amenable to securing continued employment opportunities on the site through alternative, more suitable and employment uses, akin to those underpinning SIL designations, rather than those currently there. This however would have to be underpinned by the co-location of residential development, The proximity to neighbouring employment sites does not preclude the co-location on this site. It has been previously demonstrated at appeal that non-industrial uses can be located adjacent to retained SIL land. In this instance, the site bounds a 24-hour bus garage, however any noise and disturbance can be mitigated through design. The statement in para. 5.32 of the Employment Land Review is entirely disputed. Furthermore, if this adjacent site were to come forward at a future date for redevelopment, any residential scheme within the Allocation would be designed to ensure that the development potential of the bus garage site is not extinguished. In either scenario, the residential use and development would be accommodated in a manner which accords with Policy E5 D of the London Plan. As we demonstrate above (Planning Policy Context) support for residential land is provided within the NPPF. The London Plan further recognises the land capacity issues across the London Boroughs in relation to both employment and housing growth. Indeed, the Mayoral introduction confirms that *"dealing with such levels of growth is undoubtedly one of the biggest challenges of our times, putting pressure on land, housing and infrastructure and the environment."* Support for the co-location of uses therefore forms one of the fundamental elements of delivering "Good Growth" in the London Plan. Proposals for the co-location of employment and other compatible uses is therefore supported at a strategic and national level. More broadly, the proposed redevelopment of the site to provide improved commercial and industrial facilities, supported by residential development would be consistent with the Council's strategic policies for delivering housing and employment growth within Lewisham, and the strategic direction in Policy E5 of the London Plan. Point D of Policy EC2 which confirms general support for co-locating uses, but the principles must be extended to include this part of the Bromley Road SIL and the proposed Site Allocation. Ultimately, the revision of the Site Allocation to include residential development is entirely consistent with the strategic policy for such SIL designations, would achieve the objectives of the Site Allocation, i.e. the intensification and modernisation of the commercial activities on site, would align with the Employment Land Review direction to intensify and safeguard the employment use of the site and would maintain the employment capacity within the Borough.		
(Avison Young obo)	3	LCA SA 25	The below commentary considers in detail the potential impacts of co-locating residential uses at our client's site, together with the re-provision of existing commercial uses. This indicates that there are no physical or environmental constraints that would preclude the proposed development. We have considered	The detailed assessment of the use of the site for co-location, including viability considerations, is	No change.

			12 criteria to which the suitability of the site should be considered. Taking each in turn. *Flood Zone* The site is located in Flood Zone The site is located in Flood Zone 2 and is therefore subject to a medium probability of flooding. Less vulnerable uses are defined in the PPG (Paragraph 66 Reference ID: 7-066-20140306) as follows: buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure. The proposed development would provide commercial and industrial uses on the lower floors with more vulnerable uses (residential) located above. Any subsequent planning application would be accompanied by a Flood Risk Assessment which will demonstrate no increase in flood risk onsite or within the vicinity. *Open space* The site does not comprise protected open space. *Community infrastructure* The site does not include any strategic community infrastructure. *Cultural institutions* The site does not include any strategic cultural institutions. *Heritage Designations* There are no statutory listed historic assets within, or adjacent, to the site boundary. The nearest heritage assets are approximately 100m to the west and include the Fellowship Inn Pub and attached hall (Grade II), together with a number of residential dwellings to the south east (Grade II). Given the poor visual and townscape quality of the existing structures on site, the proposed development is unlikely to result in adverse impacts on these heritage assets. A subsequent planning application would be accompanied by a Heritage Assessment which will demonstrate that the development will maintain, and wherever possible enhance the setting of the identified heritage asset(s). *Strategic infrastructure* The site does not include any strategic infrastructure, or any such safeguarded land use designations. *Air Quality* The Council' s Air Quality Action Plan 2016 confirms the Bromley Road as being located in AQMA 5. This is one of 5 focus areas, although it is noted that this relates solely to Bromley Road and not the surrounding areas (see screenshot below). AQMA 1-6 cover much broader assessment areas.	acknowledged. Our response is set out above.	

			Any redevelopment of the site would be accompanied by an Air Quality Assessment which will demonstrate that the future occupier of the development will be protected from existing poor air quality in the Borough and the new development satisfactorily minimises further contributions to existing concentrations of particulates and NO2. *Health and Safety* Our review of the Council's Proposals Map does not indicate that the site falls with any relevant health and safety related zones. *Social housing estates* The site does not form part of a social housing estate. *Other housing* The sites does not include HMOs. *Biodiversity* The Council's Proposals Map and the Greenspace Information for Greater London website2 have been accessed. The former does not indicate that there are any policy constraints associated with biodiversity. Whilst the Greenspace Information website does not provide guidance on biodiversity matter, it does indicate that the site falls within the broader Inner London National Character Area. The associated profile states that *"Overall the biodiversity resource is fragmented. Large part of the NCA are deficient in access to nature."* It suggests that this situation is not specific to the site and is equally applicable to the all of the sites located identified for development within the Borough. Given the nature of existing development, the site is considered to be in an area of low biodiversity sensitive. The site is in close proximity to Bellingham Leisure Centre (0.48km to the west) and associated open space, together with Bellingham Children's Park (0.48km to the west). Forster Memorial Park is located 1.23km to the east. Any future development of the site will be supplemented by a desk-based study and ecological site walkover as part of a Preliminary Ecological Assessment which will include consultation with non-statutory wildlife organisations. This will determine whether there are any records of protected species or important habitats on site, or within a 2km radius which may be impacted by the proposals. In the event that any impacts are identified, an appropriate scheme of mitigation will be identified. The current landowner is happy to enhance the ecological quality of the site by virtue of the scheme's redevelopment. *Contamination* The use of the site for existing commercial uses would suggest the potential for there to be a level of contamination risk. Any future development would be supported by a desk-based contamination study, which would provide future recommendations and feed into a full remediation strategy to ensure future occupiers would not be subject to harmful contamination. *Accessibility (PTAL)*		

			The TfL PTAL Calculator3 confirms the site has a PTAL rating of 4. This demonstrates the site is highly sustainable with good access to Bellingham Train Station (400m to the east of the site frontage) and 7 bus stops within close proximity of the site. The site on this basis is in a highly accessible location and could support a low-car development supporting the aspirations of the emerging Local Plan with regard to the introduction of low emission vehicles and the targets attributed to reducing carbon emissions. These aspirations are also supported by both the strategic policy context (London Plan) and national policy context (NPPF). *Other Matters* In addition to the above, we conclude that the site is within a sustainable location and set in a wider residential context. It is highly accessible with regards to public transport, together with existing amenity. The redevelopment of the site for industrial and commercial uses is unlikely to be achievable without the support of other uses, namely residential. This would be provided through a collocated scheme with ground floor uses designated for employment purposes and upper floors designated for residential uses. The precedent for tall buildings in this location has been tested at appeal (Ref: 13/2192356), with Paragraph 36 of the decision notices confirming that the previous proposals were of a comparable height to the existing buildings to the south of Randisbourne Garden and Delamare Court. Future proposals would take this into consideration and demonstrate a building of suitable scale and massing to the surrounding context. As demonstrated above, the future development of our client's site would not undermine development proposals associated with the adjacent bus garage. This would be further supported by careful and sensitive masterplanning. Furthermore, the development would accord with the principles A21 Corridor Intensification and Development SPD (when consulted upon and adopted), would align with the Council's strategic principles for development within an Area of Regeneration (Policy LSA2), and through a design-led approach, would provide a positive frontage along Bromley Road and Randlesdown Road and deliver new and improved public realm in accordance with a site-wide public realm strategy, including public realm enhancements along Bromley Road and Randlesdown Road. We must also reiterate that the principle of residential uses has already been established at the site and thus co-location with commercial and industrial uses, by virtue of 4 existing residential flats contained within the existing site boundary. Availability Paragraph 19 of the Guidance (Reference ID: 3-019-20190722) states that: *"A site can be considered available for development, when, on the best information available (confirmed by the Call for Sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled*		

			by a developer or landowner who has expressed an intention to develop may be considered available." The site is being promoted through this iteration of the Local Plan consultation for the co-location of alternative uses, including residential, on a SIL designated site. Frank Griffiths is the existing landowner and is actively seeking the site's redevelopment. As demonstrated in the commentary contained within these representations, there are no constraints relating to availability which would preclude the proposed redevelopment of the site to include residential use. The landowner has no intention of redeveloping the site in the manner proposed within the draft Allocation and as currently proposed, the site is not available. In the event that the allocation is carried through without residential use included within the accepted use, the Plan is unsound. *Safeguarded for Alternative Uses* The consultation documentation confirms the site is not within or adjacent to any existing or potential safeguarded sites. *Ownership* The site, as demonstrated in **Appendix I** and as requested to be amended within the Allocation, is within the single ownership of Frank Griffiths and there are no legal or ownership issues which would prevent the site from being delivered within the first five years of the Plan period. *Existing Uses* The site is currently in active use, as set out in the introductory sections of this letter. Notwithstanding this, these uses do not make a substantial or valuable contribution to the SIL and could be re-provided elsewhere within the Borough to more appropriate locations. *Planning Status* We have assessed the Council's online planning records and understand that there are no live or permitted planning applications associated with the site. *Potential Delivery Dates* Assuming the proposed redevelopment opportunities were to be permitted no later than Q1 of 2022, it is expected that the site would have a potential commencement date no later than Q1 of 2023. This would be within the first five years of the Development Plan and within a timeframe which would help the Council address their give year housing land supply position. Achievability Paragraph 20 of the PPG states that: *"A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period of time."*		

			Site Capacity The Site Allocation background paper proposes a 80% : 20% land use mix between employment and main town centre uses in Table A.2 and this ratio is reflected in the proposed Allocation. The Council has no methodology for this ratio, nor does it appear to have been tested via any viability method. In Table A.1, the Council states that the site development capacity has been calculated using the SHLAA methodology, but no such assessment for sites retained in industrial use is included within the SHLAA. In this respect, the Council is Allocating the site without any understanding of the economic viability specifics of the site over the plan period, nor is it based upon any sound methodology. Notwithstanding the above, the Council's general assumptions for capacity of sites requiring the re-provision of employment floorspace within a SIL co-location site is 67% residential and 33% employment. Clearly, this ratio would need to be tested on this site to ensure that the quantum of relevant floorspaces are viable. Furthermore, much of the existing site is open without any existing floorspace to benchmark against. The Council refers to the 65% plot ratio and the inclusion of floorspace and service yards being included for the purposes of existing employment capacity, however this principle has been omitted from the adopted London Plan. It is instead suggested that the quantum of employment floorspace in any re-development co-location scenario provides the same or more employment opportunities currently provided for on-site, in order to achieve the intensification that is required by the London Plan Policy E7. In assessing the capacity of the site, the Council considers that a density of 225 dwellings per hectare is assumed for a site with a PTAL 4-6 in an urban setting – where there are no sensitives to consider. This figure is contradicted by the average residential density on schemes permitted by the Council within 400m of Bellingham railway station which, according to the Council's Residential Density Technical Paper (2021) was 396 dwellings. Given the proximity to the railway station, and the local context and character, any residential density would be expected to be significantly higher than 225 units per hectare, and we consider that the stringent application of the Council's indicative development capacity in a co-location scenario would result in a capacity significantly lower than what could reasonably be delivered through the redevelopment of the site taking a design-led approach to site optimisation. In any event, any indicative residential and non-residential development capacity must be clear in that the figure provided is in no way a cap on development potential. *Viability Considerations* The site has been tested at appeal (APP/C5690/A/13/2192356 and APP/C5690/A/14/2223342), the conclusions of which confirm that given the existing land values and development costs associated with the refurbishment or redevelopment of the existing buildings would not be viable.		

			Any proposals including residential development would be subject to the same viability process as other, similar development proposals. There are no known potential or significant viability constraints on the site associated with co-locating residential uses.		
(Avison Young obo)	3	LCA SA 25	**Planning Benefits** A range of planning benefits would accrue as a result of the proposed redevelopment of the site. In the context of the three objectives underpinning sustainable development set out in the NPPF, these benefits will include: **Objective Planning Benefits** Economic • The redevelopment of the site would seek to re-provide the same level of commercial and industrial opportunities currently existing on site. • The redevelopment of existing stock would create betterment in terms of quality and enhance the SIL designation associated with the site. • An improvement in the quality of commercial building stock would increase the opportunity for new businesses to relocate to the area bringing new jobs for existing residents. • The co-location of residential uses would provide an opportunity to increase spending within the local economy that would support existing and future business. Social • The site has the capacity to deliver a high proportion of housing in the early phases of the emerging Plan Period which will make an important contribution to meeting the Council's and the GLA housing figures. • A broad mix and size of units will be incorporated into the final proposals which reflect local needs and provide choice for future residents. Environmental • The are no known biodiversity related constraints associated with the site. • The site's redevelopment provides an opportunity to remediate potentially contaminated land and support and increase in access to amenity areas such as terrace areas and private balconies. As we have demonstrated, the redevelopment of the site for employment uses, together with the co-location of alternative uses such as residential would be an effective and efficient use of land and would represent a form of sustainable development which aligns with the principles and objective of the NPPF and London Plan. There are a number of tangible economic, social and environmental benefits associated with the proposed development site. It further provides an appropriate and sustainable opportunity to deliver a balanced approach to housing and employment infrastructure provision that is a betterment to the existing provision currently provided on site. In addition, there is a significant opportunity to provide employment uses that align better with the objectives of the SIL designation.	The planning benefits associated with redeveloping this site are acknowledged. Our response is set out above.	No change.
(Avison Young obo)	3	LCA SA 25	**Conclusions** For the above reasons, we conclude that the site is suitable for the redevelopment of commercial uses, supported by the co-location of residential uses. The latter would underpin the former, which as noted would not be otherwise deliverable due to viability constraints.	Comments noted. Our response is set out above.	No change.

			The site allocation should therefore be updated the reflect our conclusions and the principle of co-locating residential uses within the SIL designation.		
(Avison Young obo)	3	LCA SA 25	In addition, we are of the view that the draft allocation wording for Allocation 25: Land at Randlesdown Road and Bromley Road should be updated to reflect the co-location of residential. At present and as demonstrated, the current Allocation renders the Local Plan unsound. As demonstrated in these representations, the site is suitable, achievable and available within the Plan period for the proposed mix of uses, inclusive of residential, and therefore meets the criteria tests test out in the Planning Practice Guidance. The Council has erred in both the principles of future uses on the site and the ratios of uses. The site presents an important opportunity in meeting the Council's identified housing needs for the Plan period. By making the suggested changes, the intensification of the SIL is achieved via a plan-led process and is entirely consistent with national and strategic policies.	Comments noted. Our response is set out above.	No change.
Millwall Football Club (CBRE Ltd obo)	3 3	LNA Spatial Objective 3	*Relates to Part 3, LNA SA 08* Our overriding comment is one of support for the principle of what the allocation seeks to achieve. There are, however, amendments that we consider are required to the site allocation to ensure that the key spatial objectives of the Draft Plan are met. Specifically, we refer to Page 561 of the Draft Plan which states that a key spatial objective (3) is to: *'Secure the future of Millwall Football Club in the Borough with a modern stadium as part of a new leisure and community destination, supported by a new Overground station.'*	Comments noted.	No change.
Fifth State and (Avison Young obo)	3	LNA Vision and Spatial Objectives	*Relates to Part 3, LNA SA 16* **Comments on Lewisham's North Area** ***Draft North Area Vision and Spatial Objectives*** The Council's vision for Lewisham North Area is strongly supported by the Owners and Developer of 5-9 Creekside. The vision re-imagines Deptford Creek to provide a well integrated employment area and mixed-use neighbourhood. In addition the Creative Enterprise Zone will cement Lewisham's position as a leader in the creative and cultural industries which will feature modern and affordable workspace, including artist studio space, building on the presence of Goldsmith's College, Trinity Laban and Albany Theatre. The objective to establish a Creative Enterprise Zone at Deptford Creekside fits well with the development aspirations Fifth State have for 5-9 Creekside. We note that Lower Creekside (Site Allocation 16) is incorrectly labelled as a Strategic Industrial Location in Figure 15.2. This should be amended to reflect the correct designation: Locally Significant Industrial Site.	Support noted. Agree that the site is not SIL and should be relabelled accordingly.	Local Plan Figure 15.2 amended by relabelling the site as LSIS.
Artworks Creekside (Avison Young obo)	3	LNA Vision	*Relates to Part 3, LNA SA 16* **Comments on Lewisham's North Area** ***Draft North Area Vision and Spatial Objectives*** The vision for the North Area explains that this area will benefit from continue renewal of older employment sites which will influence the areas evolving	Support noted.	No change.

			character whilst helping to improve its environmental qualities. Deptford Creek to provide a well integrated employment area and mixed use neighbourhood. In addition the Creative Enterprise Zone (CEZ), and that the Deptford Creekside Cultural Quarter will grow, and will cement the Borough's position as one of London's leaders in the creative, cultural and digital industries the renewal of industrial sites such as 2 and 3 Creekside. Artworks Creekside have long since supported these principles in their current operations at the two sites and continue to support the Council's ambitions.		
Fifth State and (Avison Young obo)	3	LNA 01	*Relates to Part 3, LNA SA 16* ***Draft Policy LNA1 – North Area place principles*** The Owners and Developer of 5-9 Creekside support Part A of the draft policy which seeks to facilitate Good Growth, regeneration and intensification and renewal of industrial sites in order to promote cultural and creative industries. Whilst Fifth State agree that heritage-led regeneration will be important within the North Area, particularly for areas identified in Part E(a) to (c) (including Royal Naval Dockyard, Grand Surry Canal and Deptford High Street and New Cross High Street), where sites are identified to accommodate growth to support the Council's objectively assessed needs, heritage considerations must be considered alongside public benefits as part of the overall planning balance (this has already been mentioned in response to draft Policies HE2 and HE3).	Agree that heritage considerations should form part of the overall planning balance.	Local Plan amended to include the need for a balanced judgement to be taken.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA 01	*Relates to Part 3, LNA SA 14* **Lewisham's North Area and Creative Enterprise Zone (CEZ)** We note the thrust of Policy LNA1 (North Area place principles) and Policy LNA3 (Creative Enterprise Zone) seeks to deliver regeneration benefits for the locality, including the delivery of creative uses which is supported by our Client.	Support noted.	No change.
Cockpit Arts (The Planning Lab obo)	3	LNA 01	*Relates to Part 3, LNA SA 14* • CA is generally supportive of these principles which reflect aspects of other Plan policies in their application to the North Area, especially those concerning delivery of new employment floorspace and the promotion of creative industries within the Lewisham North Creative Enterprise Zone (see below).	Support noted.	No change.
Artworks Creekside (Avison Young obo)	3	LNA 01	*Relates to Part 3, LNA SA 16* ***Draft Policy LNA1 – North Area place principles*** Artworks Creekside support Part A of the draft policy which seeks to facilitate Good Growth, regeneration and intensification and renewal of industrial sites in order to promote cultural and creative industries. Part A (c) of Policy LNA1 is strongly supported, whereby the opportunities to provide new and improved workspace through intensification of sites and renewal of employment land is encouraged. The over-arching requirement for comprehensive regeneration of strategic sites to deliver new urban localities, bringing a significant amount of new housing and workspace will ensure that the regeneration potential of the Opportunity Area within which 2 and 3 Creekside are location, will occur. Having met with Council Officers in pre-application discussion, we can appreciate the Council's desire for heritage-led regeneration however this requires a clear	Agree that there should be a balance between heritage led regeneration and other policy objectives.	Local Plan amended to include the need for a balanced judgement to be taken.

			balance against other Policies and objectives contained with the development plan, and ultimately, the planning balance for any redevelopment proposals.		
Fifth State and (Avison Young obo)	3	LNA 03	*Relates to Part 3, LNA SA 16* ***Draft Policy LNA3 – Creative Enterprise Zone*** The creation of a new Creative Enterprise Zone (CEZ) covering the Lower Creekside area is strongly supported by the Owners and Developer of 5-9 Creekside.	Support noted.	No change.
L&Q Group	3	LNA 03	*Relates to Call for site* 4.8 North Character Area The North Character Area, as described in Chapter 15 of the Local Plan, is one undergoing change. Containing much of the Borough's employment stock, several larger industrial sites have undergone regeneration, and contemporary mixed use residential and employment schemes have been introduced, including larger tower blocks with taller elements situated on landmark sites. L&Q supports LBL's vision that regeneration of larger brownfield sites in the area will deliver a significant amount of new housing. L&Q supports North Deptford being included in the Creative Enterprise Zone (Policy LNA3).	Support noted.	No change.
SEGRO (CBRE Limited obo)	3	LNA 03	*Relates to Part 3, LNA SA 04* • Revising the Creative Enterprise Zone Policy to not apply, or to be applied flexibly, within the SILs to ensure that these locations can continue to accommodate businesses that are not necessarily 'creative' but which play an essential role in servicing the borough's other businesses and communities.	Noted	No change.
SEGRO (CBRE Limited obo)	3	LNA 03	*Relates to Part 3, LNA SA 04* 7. Cultural Enterprise Zone The points made in part 6. above regarding low cost and affordable workspace apply equally to Policy LNA3 (Lewisham North Creative Enterprise Zone). Part D of Policy LNA3 resists development proposals involving the loss of B1 Use Class workspace that is currently occupied by, or suitable for, uses in the creative and cultural industries, including artists' workspace. Whilst we support 'creative' industries and consider a number of our customers to be defined as such, we are concerned that this requirement in SILs will limit the amount of land that is available for warehousing/logistics facilitates that are more difficult to incorporate into mixed use development and so rely heavily on SILs to provide sufficient supply. As such, we recommend that a further test is added to part D to allow this policy to be applied flexibly in SILs where new development is meeting the needs of occupiers who play an essential role in servicing the borough's other businesses and communities, and who cannot be easily accommodated in existing available premises in the borough or emerging mixed use developments.	Disagree as the Local Plan seeks the continued growth and evolution of the creative and cultural industries in the north of the borough. SIL will only being released where compensatory provision of SIL can be delivered elsewhere.	No change.
Cockpit Arts (The Planning Lab obo)	3	LNA 03	*Relates to Part 3, LNA SA 14* • Cockpit Arts enjoys an international profile and reputation in its field, which we suggest should be recognised in the plan (alongside other listed organisations). We regularly deliver overseas programmes and welcome visitors from around the globe wanting to learn from our model.	Support noted. Agree that maker space has different requirements from digitally driven creative businesses but this does not need to be specified in policy. Also	Local Plan amended by clarifying the requirement of maker space in LNA 03 and by clarifying that masterplanning must

			• We endorse this policy, specifically the protection and enhancement of workspace provision at Deptford Creekside and the commitment to ensure a wide range of creative workspaces and affordable employment floorspace comes forward (not just 'arts'). • We query how this policy will be applied to applications already under consideration in the CEZ which do not meet the policy requirements, with specific reference to the Sun Wharf scheme under consideration, which does not appear to deliver on this policy's expectations around employment floorspace. • How will this policy be retrospectively applied to applications already under consideration in the CEZ which have the potential to limit the growth of specific creative workspaces e.g. the Sun Wharf scheme/Cockpit Arts. • We query what is meant by 'high quality' in relation to new workspace and would emphasise that, whilst there are minimum requirements for all types of spaces (proper heating, facilities, etc.) this differs for maker space vs. office space for creative businesses.	agree with the points made about masterplanning and co-ordination of applications.	ensure that initial phases of development do not hinder the latter phases.
Artworks Creekside (Avison Young obo)	3	LNA 03	*Relates to Part 3, LNA SA 16* ***Draft Policy LNA3 – Creative Enterprise Zone*** Artwork Creekside support the principles within draft Policy LNA3 for the designation of a Creative Enterprise Zone. The client reserves the right to comment further upon '*an appropriate range of rents*', in the same manner that it awaits guidance in an Affordable Workspace SPD.	Support and comments noted.	No change.
The Renewal Group (Carney Sweeney obo)	3	LNA 03	*Relates to Part 3, LNA SA 08* **Policy LNA3 Creative Enterprise Zone** This policy needs to be updated to have regard to the changes to the London Plan prior to its final adoption and publication. It also needs to be updated to have regard to the changes to the Use Classes Order, in particular new Use Class E and the imminent amended permitted development rights later this year. The Inspector considering the Westminster Local Plan in 2020 made clear the importance of this.	Agree that the Local Plan needs to align with national and regional policy.	Local plan amended to make consistent references to new use classes and permitted development rights, and to align with the adopted version of the London Plan.
Artworks Creekside (Avison Young obo)	3	LNA 04	*Relates to Part 3, LNA SA 16* ***Draft Policy LNA4 – Thames Policy Area and Deptford Creekside*** The pre-application discussions to date in relation to 2 Creekside have considered the relationship to Deptford Creek. Artwork Creekside appreciate the benefit of a positive relationship with the Creek; however it must not be an explicit requirement to provide public access to the Creek within a development site. The caveat to ensure accessible public space, '*where possible*', must be maintained throughout the Plan process. Furthermore, it appears unnecessary to ensure that special regard is paid to the significance of heritage assets and their setting under this Policy. The impact upon designated and non-designated assets are appropriately dealt with under the respective Policies.	Disagree, public access along Deptford Creek and the maritime and industrial heritage of the area are important features of this riverfront area and it is important that this policy makes reference to these attributes.	No change.
SEGRO (CBRE Limited obo)	- 3	General LNA SA 04	SEGRO RESPONSE - REGULATION 18 DRAFT LOCAL PLAN CONSULTATION CBRE Limited is instructed by SEGRO to make representations to the London Borough of Lewisham Local Plan (Main Issues and Preferred Approaches) Regulation 18 consultation (hereafter "draft plan"). We set out below our overarching comments on the draft plan and our specific comments relating to the Deptford Trading Estate, which SEGRO owns and manages.	Comments noted.	No change.

SEGRO (CBRE Limited obo)	- 3	General LNA SA 04	SEGRO SEGRO is a UK Real Estate Investment Trust (REIT), and a leading owner, manager and developer of modern warehouses and light industrial property. It owns or manages 6.4 million square metres (69 million square feet) of space, serving customers from a wide range of industry sectors. In Greater London, its portfolio extends to over 12.5 million square feet of light industrial and urban logistics space and is home to over 420 customers operating from 55 estates across the capital. These customers, which include major businesses such as Rolls Royce, Brompton Bike, British Airways, Ocado, John Lewis, DHL, employ over 20,000 people and operate in a range of sectors from e-retailing to manufacturing, TV and media to aerospace and automotive to food production. In February 2017, SEGRO launched its 'Keep London Working' report to highlight the importance of industrial land to London's economy and productivity, the structural changes the sector is experiencing and the challenges it faces with the excessive release of industrial land for high value uses, such as housing. The report focussed in particular on urban logistics, which involves the movement of goods and services across the City. Urban logistics is a key element of London's industrial sector, including in LB Lewisham, where such facilities are needed to ensure that the borough's residents and businesses have timely access to the goods they need to thrive. Demand for these facilities will increase with the growth in the population and business that is planned for the next 15 years. The report can be accessed here.	The supplementary information is noted.	No change.
Lendlease (Lichfields obo)	- 3	General LNA SA 02	**Lewisham Local Plan Regulation 18 Consultation- April 2021** We write on behalf of our client, Lendlease, in response to the above consultation. Lendlease welcome the opportunity to engage with London Borough of Lewisham (LBL) on the new Local Plan. Lendlease is committed to bringing forward a high quality and deliverable scheme on the Deptford Landings development site (formerly known as Timber Yard/Deptford Wharves) which was granted Hybrid Planning Permission in March 2016 (ref. DC/15/92295). This site is allocated within the draft Local Plan as North Area Site Allocation 2, Timberyard, Deptford Wharves. This letter sets out Lendlease's response to the Regulation 18 stage 'Main Issues and Preferred Approaches' version of Lewisham's draft Local Plan dated January 2021. Following some general comments, the response will be organised in accordance with the themes set out on the consultation webpage. **Background** On 23 March 2016, hybrid planning permission was granted by LBL for the comprehensive mixed use redevelopment of land bounded by Oxestalls Road, Grove Street, Dragoon Road and Evelyn Street (excluding Scott House, 185 Grove Street) formerly known as The Timberyard and now named Deptford Landings. The scheme comprises six Plots, including detailed planning permission for the first phase of development, Plots 1, 2 and 3 (ref. DC/15/92295).	Support, comments and supplementary information are noted.	No change.

			This permission was granted for up to 10,413sqm of non-residential floorspace (A1/A2/A3/A4/A5/B1/D1/D2 and an energy centre) and up to 1,132 residential units in buildings ranging from 3 storeys to 24 storeys in height, including detailed planning permission for up to 562 residential units and up to 5,692sqm of non-residential floorspace (A1/A2/A3/A4/A5/B1/D1/D2) in buildings ranging 3 storeys to 24 storeys in height. The detailed part of the hybrid planning permission covers Plots 1, 2 and 3. The planning permission has subsequently been amended by several non-material amendment (NMA) applications. Lendlease is currently proposing a number of amendments to the approved masterplan for the site and has engaged in pre-application discussions with the Council in relation to optimisation of the site. Lendlease therefore welcome the opportunity to engage in the local plan process and are supportive of LBL's aspirations for the Borough. Below is a summary of the key areas which Lendlease would like to comment on.		
Lendlease (Lichfields obo)	- 3	General LNA SA 02	**Ease of use** Overall, at 870 pages in length, the draft Local Plan contains a huge breadth of detailed guidance and in some places is repetitive or duplicates existing London Plan 2021 or national policy. National Planning Practice Guidance states that *'all plans need to be as focused, concise and accessible as possible'* (para. 002 ref. 61-002-20190315). The plan would form a more usable and accessible document if it was more concise and did not seek to unnecessarily repeat information provided elsewhere. The National Planning Policy Framework (2019) states that plans should *'serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area'* (para. 16). The London Plan 2021 and NPPF form part of Lewisham's Development Plan, therefore, it is not necessary to repeat the requirements contained in these documents in the Local Plan. To give one example, much of Local Plan Policy QD2 (Inclusive and Safe Design) replicates existing London Plan 2021 policies D5 (Inclusive Design) and D7 (Accessible Housing). More examples are highlighted in the following response; however, this is not a comprehensive list and we recommend a thorough review of the plan to remove unnecessarily duplicated policy. The aspirations of the White Paper 'Planning for the Future' (August 2020) should also be taken into consideration when preparing the Lewisham Local Plan. One of these aspirations being that local plans significantly reduce in size, by at least two thirds, following a defined template, with the NPPF becoming the primary source of policies for Development Management and local plan policies restricted to clear and necessary site or area specific requirements.	Policies have been included within the Local Plan where they provide useful local interpretation, to aid the implementation of national policy or London Plan policies. However, agree to review the plan to identify unnecessary duplication.	Local Plan amended to reduce repetition thereby shortening the length of the Local Plan.
Lendlease (Lichfields obo)	- 3	General LNA SA 02	**Summary** Lendlease welcome the opportunity to comment on the emerging Lewisham Local Plan and are keen to continue to engage especially in relation to the Deptford Landings site. Lendlease's views and comments should be carefully considered and addressed, to ensure that the delivery of high-quality development at Deptford Landings continues smoothly.	Comments noted.	No change.

			Lendlease is supportive of Lewisham's aspirations in the Local Plan, particularly in relation to design quality, inclusive design, placemaking and public realm, and driving sustainability standards. However, changes to the document are necessary to ensure it is concise and accessible, avoiding unnecessary repetition of existing policies. Furthermore, Lendlease's comments with the site allocation for the Deptford Landings site have been detailed above and need to be addressed. Should you wish to discuss comments within these representations further please do not hesitate to contact us.		
Lendlease (Lichfields obo)	3	LNA SA 02	**Lewisham's North Area** **North Area Site allocation 2 – Timber Yard, Deptford Wharves** This policy refers to the site owned by Lendlease where development is ongoing in accordance with the approved masterplan Catford1 (DC/15/092295). Overall Lendlease support the development guidelines and requirements, and these reflect Lendlease's objectives for the site. However, it is questioned whether this site allocation is necessary considering the site has an extant planning permission secured by the Hybrid Planning Permission which contains the development parameters and masterplan for the site. Therefore, the site allocation is duplicating this information. This should be reviewed in due course as part of the Local Plan preparation in the context of the amended proposals coming forward for the site and the timing of their delivery. Assuming the allocation remains, Lendlease request that the Local Plan refers to the site as 'Deptford Landings' for clarity and consistency with the name of the development currently being used. It could be added that the site was previously referred to as Oxestalls Road in the Core Strategy. Other comments on this policy: 1 The 'Site Details' section refers to the current use of the site as Industrial. However, the planning permission has been implemented and is partly in residential use. The policy should therefore also note that the current use of the site is therefore partly in residential use. 2 The 'Planning Status' section should be updated to note that Hybrid rather than Outline Planning Permission has been secured, construction has commenced, and Plot 2 is completed and occupied. 3 The policy should clearly state that the Hybrid Planning Permission provides the approved masterplan for this site allocation. 4 Due to the applications that are coming forward it should be noted that the total non-residential floorspace for the site is up to 10,840 sqm (including currently proposed alterations that are coming forward). 5 The remaining Plots will be delivered between 2021-2026. 6 Paragraph 15.24 is incomplete and needs to be completed with reference to the Reserved Matters approval for Plot 4 and Plot 6. 7 Paragraph 15.27 states that 'development must be in accordance with a masterplan to ensure coordination of uses across the site'. It should be noted that the Hybrid Planning Permission secured the masterplan for this site and therefore this should be referred to.	Support is noted. Agree that the site be called Deptford Landings (previously known as Oxestalls Road). Disagree that the site allocation should be removed from the Local Plan as it will be delivered in phases over the Plan period and forms one of the most important strategic development sites in the borough. Agree with the other comments that seek updates to the text to align with the current position.	Local Plan amended by changing the name of the site allocation to Deptford Landings and to provide updates regarding the site's planning, masterplan and delivery status.
SEGRO	-	General	Conclusion	Comments noted.	No change.

(CBRE Limited obo)	3	LNA SA 04	We believe there will be sustainable solutions to addressing these comments and welcome the opportunity to discuss these matters with you. We trust that these representations are clear and would be grateful if you could confirm receipt. If there is any queries or point of clarification, please contact me		
SEGRO (CBRE Limited obo)	3	LNA SA 04	With regards to Evelyn Court specifically, we note that the Lewisham Employment Land Study 2019 recommends that this site is not released for housing and continues to be protected for industrial capacity. The allocation of this site for residential uses is therefore not justified.	The site has an extant prior approval for conversion of office to residential. It is therefore deemed that the SIL is compromised and that a site allocation that supports co-location of uses can help bring about a high quality, mixed use development that will be preferable to a prior approval scheme.	No change.
Vision Develop (Q Square obo)	3	General LNA SA 04	**Draft Lewisham Local Plan – Regulation 18 Stage Representations on behalf of Vision Develop** We write to you on behalf of Vision Develop in respect of the Regulation 18 Stage of the Draft Lewisham Local Plan. Vision Develop specifically has an interest in land identified as Site Allocation 4 (Evelyn Court), within the Lewisham North Area. They are working collaboratively with Lewisham Homes, who also have an interest in the Site, to deliver a masterplan scheme across the Site Allocation. Comments specifically relating to this Draft Site Allocation are provided and some further comments in relation to specific planning policies are also included. In general, Vision Develop support the emergence of the new Local Plan and support the Council in progressing the document towards adoption.	Support noted. Responses to further detailed representations set out elsewhere in this Consultation Statement.	No change.
Vision Develop (Q Square obo)	3	LNA SA 04	**Site Allocation 4 – Evelyn Court at Surrey Canal Road Strategic Industrial Location** Vision Develop support the release of the site for co-location development, including employment and residential uses. However, our comments relate to some of the specific wording within the draft designation, including: • We are supportive of the proposed removal of the Site from the Surrey Canal Strategic Industrial Land (SIL) designation, as identified on the Draft Local Plan "Proposed Changes to the adopted Policies Map"; • On the basis that the Site is proposed to be removed from the Surrey Canal SIL designation, we consider that the title of the draft Site Allocation should remove reference to the current SIL designation; • In terms of the indicative capacity from a residential units perspective, we consider that this should be a range which better reflects the development potential of the site (i.e. from 80 to 130 new homes). We have been undertaking pre-application discussions with the Council which have informed this range; • The draft Site Allocation also states that the redevelopment of the site should be 'employment led'. We consider that it should be clarified that the redevelopment should be employment led from "…a design perspective…" to ensure that any proposal reflects this;	~~Is this a landowner?~~ Support noted. Agree that the site title and policy reference needs amending. The council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including that it has been re-designated from SIL to LSIS, taking account of the	Name of site allocation amended to remove SIL and to refer instead to LSIS. Evelyn Court LSIS site allocation amended to refer to LSIS policy and tall buildings. Site capacity amended with residential increased to 102 units and employment floorspace increased to 2,381m^2.

			• We consider that reference to the potential for a taller or tall building could be included within the draft Site Allocation. This is on the basis that the Site is within the context of taller buildings at the adjacent Timberyard site. In addition, Figure 5.1 of the Draft Local Plan indicates that the Site is within a 'more suitable' location for a tall / taller building and Figure 5.2 indicates that it is within a 'less sensitive' location for a tall / taller building. The Site is also not within any strategic or local views. In this context, we consider that the wording of the draft Site Allocation could be updated to indicate this potential; • Under the 'Development Requirements' section of the draft Site Allocation, there is cross reference to Draft Policy EC2. However, we consider that, with the de-designation of the Site from SIL, that the reference should instead be made to draft Policy EC7.	existing character of the area and pre-application discussions for this site. Based on these considerations, the land use mix and residential units have been amended. Disagree that the words "a design perspective" should be included as optimal capacity for the site will be established at planning application stage through a design led approach. Agree that tall buildings should be referenced and that the site allocation should refer to the LSIS policy, not SIL policy.	
Tribe Student Housing (Avison Young obo)	- 3	General LNA SA 06	**Representation on Lewisham Local Plan: Main Issues and Preferred Approaches and Proposed Changes to the Adopted Policies Map (Regulation 18 Consultation).** We write on behalf of our client, Tribe Student Housing Ltd, to submit a representation to the London Borough of Lewisham (LBL) in response to the following consultation documents: • Local Plan: Main Issues and Preferred Approaches; and • Proposed Changes to the Adopted Policies Map. The consultation period on both of these documents closes on 11th April 2021. This letter contains an overview of the Site being promoted by Tribe Student Housing Ltd before making representations on the Local Plan and Proposed Changes to the Adopted Policies Map in relation to the proposed site allocation.	Comments noted.	No change.
Tribe Student Housing (Avison Young obo)	- 3	General LNA SA 06	**Site Context and Background** The Site is located at 164-196 Trundley's Road and 1-9 Sanford Street, Deptford SE8 5JE. The site lies southwest of Deptford Park, adjacent to Folkestone Gardens and extends to approximately 0.38ha. The site is bound by Trundley's Road to the east, Sanford Street to the south, railway lines and a TfL operations building (substation) to the west and Juno Way to the north. The site benefits from a long frontage to Folkestone Gardens. A planning application was submitted for the Site in August 2020 and is pending determined by LBL (ref 20/117866) for the following description of development: *"Demolition of existing buildings and redevelopment of the site for two new buildings comprising flexible commercial floorspace (Use Class B1c/B2/B8) at ground and mezzanine floors and residential units (Use Class C3) and purpose-built student accommodation bedspaces (Use Class Sui Generis) above, with associated access and highway works, amenity areas, cycle, car parking and*	The supplementary information is noted.	No change.

			refuse/recycling stores at 164-196 Trundleys Road and 1-9 Sanford Street, SE8 5JE." The determination of this application has been delayed until the LBL regulation 18 draft Local Plan is published. Within the adopted LBL Local Plan, the Site falls within the wider Surrey Canal Strategic Industrial Location (SIL) which protects industrial uses. However, it was confirmed by LBL that the Site would be allocated for co-location of commercial and residential uses in the emerging Local Plan, rendering the development proposals acceptable in principle. This is now reflected in the draft Local Plan (as discussed in this letter) as the site is allocated for comprehensive employment-led redevelopment and co-location of compatible commercial, residential and complementary main town centre uses and de-designated from SIL. The planning application includes conventional residential as well as Purpose-Built Student Accommodation (PBSA). The Site is located within proximity of surrounding Higher Education Institutions and there is an increasing need for PBSA in the Borough and in London generally. In particular, the site is well located to serve Goldsmiths College, University of London, Trinity Laban Conservatoire of Music and Dance and Ravensbourne University London. The redevelopment of this site for employment-led mixed-use development will generate a number of key public benefits: • Redevelopment of an underused brownfield site (in line with the NPPF); • An increase in industrial capacity through the provision of new high quality flexible industrial floorspace; • Provision of conventional residential units, including affordable housing, contributing towards borough and London-wide housing targets; • New student bedspaces, contributing to a local and national need for student accommodation and freeing-up the conventional housing stock for local people; • Creation of new jobs associated with the commercial floorspace, plus additional jobs during the construction phase of the development and within the wider economy; • Improvements to the public realm and pedestrian environment near Folkestone Gardens; • A sustainable scheme including connection to SELCHP; and • CIL and s106 contributions towards local infrastructure improvements.		
Tribe Student Housing (Avison Young obo)	- 3	General LNA SA 06	We understand that the comments received as part of this consultation will inform the 'Proposed Submission' version of the Local Plan, which will be published for public consultation (Regulation 19 stage). We look forward to continued engagement with the Council through the Local Plan preparation process. We look forward to confirmation of receipt of these representations at the earliest opportunity. If you have any queries, please do not hesitate to contact us.	Comments noted.	No change.

Trundley's Road Ltd (Avison Young obo)	- 3	General LNA SA 06	**Representation on Lewisham Local Plan: Main Issues and Preferred Approaches and Proposed Changes to the Adopted Policies Map (Regulation 18 Consultation)** We write on behalf of our client, Trundley's Road Ltd, to submit a representation to the London Borough of Lewisham (LBL) in response to the following consultation documents: • Local Plan: Main Issues and Preferred Approaches; and • Proposed Changes to the Adopted Policies Map. The consultation period on both of these documents closes on 11th April 2021. This letter contains an overview of the Site being promoted by Trundley's Road Ltd before making representations on the Local Plan and Proposed Changes to the Adopted Policies Map in relation to the proposed site allocation.	Comments noted.	No change.
Trundley's Road Ltd (Avison Young obo)	- 3	General LNA SA 06	**Site Context and Background** The Site is located at 164-196 Trundley's Road and 1-9 Sanford Street, Deptford SE8 5JE. The site lies southwest of Deptford Park, adjacent to Folkestone Gardens and extends to approximately 0.38ha. The site is bound by Trundley's Road to the east, Sanford Street to the south, railway lines and a TfL operations building (substation) to the west and Juno Way to the north. The site benefits from a long frontage to Folkestone Gardens. A planning application was submitted for the Site in May 2018 on behalf of Trundley's Road Ltd and is pending determined by LBL (ref DC/18/106941) for the following description of development: "*Demolition of the existing buildings and construction of a basement, double height commercial plinth at ground floor and two buildings, one of part 6, part 9 storeys and one of part 11, part 15 storeys to provide 2,220 sqm (GIA) of flexible commercial space (use classes B1c/B2/B8) at ground and mezzanine floors with 189 residential dwellings above, together with provision of associated access and highway works, amenity areas, cycle, disabled and commercial car parking (within the basement), and refuse/recycling stores.*" The determination of this application has been delayed until the LBL regulation 18 draft Local Plan is published. At the time of submission, the Site fell within the wider Surrey Canal Strategic Industrial Location (SIL) which protects industrial uses. However, it was confirmed by LBL that the Site would be allocated for co-location of commercial and residential uses in the emerging Local Plan, rendering the development proposals acceptable in principle. This is now reflected in the draft Local Plan (as discussed in this letter) as the site is allocated for comprehensive employment-led redevelopment and co-location of compatible commercial, residential and complementary main town centre uses and de-designated from SIL. The redevelopment of this site for employment-led mixed-use development will generate a number of key public benefits: • Redevelopment of an underused brownfield site (in line with the NPPF);	The supplementary information is noted.	No change.

			• An increase in industrial capacity through the provision of new high quality flexible industrial floorspace; • Provision of conventional residential units, including affordable housing, contributing towards borough and London-wide housing targets; • The creation of new jobs associated with the commercial floorspace, plus additional jobs during the construction phase of the development and within the wider economy; • Improvements to the public realm and pedestrian environment near Folkestone Gardens; • A sustainable scheme including connection to SELCHP; and • CIL and s106 contributions towards local infrastructure improvements.		
Trundley's Road Ltd (Avison Young obo)	- 3	General LNA SA 06	We understand that the comments received as part of this consultation will inform the 'Proposed Submission' version of the Local Plan, which will be published for public consultation (Regulation 19 stage). We look forward to continued engagement with the Council through the Local Plan preparation process. We look forward to confirmation of receipt of these representations at the earliest opportunity. If you have any queries, please do not hesitate to contact us.	Comments noted.	No change.
	3	General LNA SA 06	I write with regard to the site 164-196 Trundleys Road and 1-9 Sanford Street, Deptford SE8 5JE which I am the landowner to submit a representation to the London Borough of Lewisham (LBL) in response to the following consultation documents: - Local Plan: Main Issues and Preferred Approaches; and - Proposed Changes to the Adopted Policies Map This letter contains an overview of the site currently being promoted, which currently has two planning applications pending determination (due to be heard at the Strategic Planning Committee March 23rd 2021) before making representations on the Local Plan and Proposed Changes to the Policies Map in relation to the proposed site allocation.	Comments noted.	No change.
	3	General LNA SA06	I understand that the comments received as part of this consultation will inform the 'Proposed Submission Version' of the Local Plan, which will be published for public consultation (Regulation 19 stage). I look forward to engagement with the Council through the Local Plan preparation process. I look forward to confirmation of receipt of these representations at the earliest opportunity. If you have any queries please do not hesitate to contact myself.	Comments noted.	No change.
Tribe Student Housing (Avison Young obo)	3	LNA SA 06	As above, Trundley's Road is the subject of a draft site allocation (no. 6 – Strategic Industrial Land (SIL) at Surrey Canal Road and Trundley's Road). This draft allocation is for "Comprehensive employment-led redevelopment. Co-location of compatible commercial, residential and complementary main town centre uses". The draft site allocation sets out the following: *"The site is situated within the Surrey Canal Road Strategic Industrial Location, on the south side of Surrey Canal Road and adjacent to Folkestone Gardens. The site functions in isolation of the remaining SIL land by virtue of a railway line that creates a physical barrier at the western edge. It is occupied by a mix of industrial*	Co-location is generally not appropriate within SIL. However, the Employment Land Study identifies this site as appropriate for co-location. Therefore de-designation of the SIL is being sought so as to help with the delivery of	Surrey Canal Road and Trundleys Road site allocation amended by de-designating SIL and re-designating as LSIS, where co-location is allowed. A new site allocation has been added for Bermondsey

			units and associated yard space, a scrap yard, and a small terrace of retail and residential uses at the southernmost end along Trundley's Road. Redevelopment and site intensification, along with the co-location of commercial and other uses, will deliver high quality workspace that forms part of a new employment-led mixed use quarter, together with the Apollo Business Centre SIL and Neptune Wharf MEL sites. Replacement provision of SIL land will be made at the Bermondsey Dive Under site. Development will also enable public realm enhancements to improve the walking and cycle environment as well as the amenity of Folkestone Gardens and neighbouring residential areas." Overall, the client is supportive of the de-designation of the Trundley's Road site from SIL. However, in the first instance, we maintain our position that a mixed-use development including residential use could come forward on the site even without the de-designation from SIL. This is on the basis that the site is not a typical SIL site in terms of its existing land uses, location and context. Firstly, the site is currently occupied by a range of uses, including a row of vacant terraced shops with residential accommodation above. Moreover, this part of the SIL designation has been identified to be amongst the poorest quality in terms of environment and functionality. Therefore, the principle of mixed-use development including residential on the site should be considered acceptable given the site's current characteristics. Notwithstanding this, the client is supportive of the draft site allocation and overall approach to industrial land, including the designation of compensatory SIL land at the Bermondsey Dive Under.	employment-led mixed uses on this site. To compensate Bermondsey Dive Under will be designated as SIL.	Dive Under, designated as both SIL and LSIS.
Tribe Student Housing (Avison Young obo)	3	LNA SA 06	There are multiple ownerships within site allocation no. 6. As such, it is likely that development on the site will come forward in phases. Therefore, we consider the site allocation should explicitly acknowledge that individual sites within the allocation can come forward within their ownership restrictions, provided that they have the necessary regard to potential future development on adjacent sites.	Noted. Policy DM3 already deals with multiple ownerships and phasing of sites.	Surrey Canal Road and Trundleys Road site allocation amended by referring to partnership working, phasing and policy DM3.
Tribe Student Housing (Avison Young obo)	3	LNA SA 06	In summary, we are supportive of the draft site allocation no. 6 and aspiration for the Trundley's Road site to deliver a comprehensive employment-led redevelopment and co-location of compatible commercial, residential and complementary town centre uses. However, as set out in this representation, we consider a number of amendments could be made to ensure that the development capacity of the site is optimised and a suitable mix of uses is sought in order to enhance and deliver growth in this key location whilst helping the borough meet its housing targets.	Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the de-designation from SIL and the introduction of co-location on this site. Based on these considerations, the capacities have been amended to reflect planning consent granted for the site and the pre-application for the remainder of the site. Optimal capacity for the Juno Way part of the site	Surrey Canal Road and Trundleys Road site allocation capacities amended to increase residential to 274 (using ratio of 2.5:1 for PBSA) and increase employment to 2,890m^2.

				will be established at planning application stage through a design led approach.	
Trundley's Road Ltd (Avison Young obo)	3	LNA SA 06	As above, Trundley's Road is the subject of a draft site allocation (no. 6 – Strategic Industrial Land (SIL) at Surrey Canal Road and Trundley's Road). This draft allocation is for "Comprehensive employment-led redevelopment. Co-location of compatible commercial, residential and complementary main town centre uses". The draft site allocation sets out the following: *"The site is situated within the Surrey Canal Road Strategic Industrial Location, on the south side of Surrey Canal Road and adjacent to Folkestone Gardens. The site functions in isolation of the remaining SIL land by virtue of a railway line that creates a physical barrier at the western edge. It is occupied by a mix of industrial units and associated yard space, a scrap yard, and a small terrace of retail and residential uses at the southernmost end along Trundley's Road. Redevelopment and site intensification, along with the co-location of commercial and other uses, will deliver high quality workspace that forms part of a new employment-led mixed use quarter, together with the Apollo Business Centre SIL and Neptune Wharf MEL sites. Replacement provision of SIL land will be made at the Bermondsey Dive Under site. Development will also enable public realm enhancements to improve the walking and cycle environment as well as the amenity of Folkestone Gardens and neighbouring residential areas."* Overall, the client is supportive of the de-designation of the Trundley's Road site from SIL. However, in the first instance, we maintain our position that a mixed-use development including residential use could come forward on the site even without the de-designation from SIL. This is on the basis that the site is not a typical SIL site in terms of its existing land uses, location and context. Firstly, the site is currently occupied by a range of uses, including a row of vacant terraced shops with residential accommodation above. Moreover, this part of the SIL designation has been identified to be amongst the poorest quality in terms of environment and functionality. Therefore, the principle of mixed-use development including residential on the site should be considered acceptable given the site's current characteristics. Notwithstanding this, the client is supportive of the draft site allocation and overall approach to industrial land, including the designation of compensatory SIL land at the Bermondsey Dive Under.	Disagree. Co-location is generally not appropriate within SIL. However, the Employment Land Study identifies this site as appropriate for co-location. Therefore de-designation of the SIL is being sought so as to help with the delivery of employment-led mixed uses on this site. To compensate Bermondsey Dive Under will be designated as SIL.	Surrey Canal Road and Trundleys Road site allocation amended by de-designating SIL and re-designating as LSIS, where co-location is allowed. A new site allocation has been added for Bermondsey Dive Under, designated as both SIL and LSIS.
Trundley's Road Ltd (Avison Young obo)	3	LNA SA 06	The draft site allocation is for comprehensive employment-led redevelopment. Co-location of compatible commercial, residential and complementary main town centre uses. We consider there should be greater flexibility in the site allocation to reflect the suitability of other uses on the site, including PBSA. The site is a good location for student accommodation due to the proximity and accessibility of the site to higher education institutions such as Goldsmiths College and the University of London. The provision of PBSA on the site would free-up conventional housing stock for local people whilst contributing towards London-wide targets for PBSA bedspaces and overall housing need in the borough. There is an unmet demand for student accommodation which is expected to increase due to COVID-19 and therefore the provision of PBSA will become more important in order to protect the existing conventional housing stock in the borough for family accommodation. We therefore consider the draft	Agree that the site is a suitable location for purpose built student accommodation.	Surrey Canal Road and Trundleys Road site allocation amended to make reference to purpose built student accommodation and to reflect planning consent granted for the site.

			site allocation should be amended to include PBSA as an acceptable use on the site.		
Trundley's Road Ltd (Avison Young obo)	3	LNA SA 06	There are multiple ownerships within site allocation no. 6. As such, it is likely that development on the site will come forward in phases. Therefore, we consider the site allocation should explicitly acknowledge that individual sites within the allocation can come forward within their ownership restrictions, provided that they have the necessary regard to potential future development on adjacent sites.	Noted. Policy DM3 already deals with multiple ownerships and phasing of sites.	Surrey Canal Road and Trundleys Road site allocation amended by referring to partnership working, phasing and policy DM3.
Trundley's Road Ltd (Avison Young obo)	3	LNA SA 06	In summary, we are supportive of the draft site allocation no. 6 and aspiration for the Trundley's Road site to deliver a comprehensive employment-led redevelopment and co-location of compatible commercial, residential and complementary town centre uses. However, as set out in this representation, we consider a number of amendments could be made to ensure that the development capacity of the site is optimised and a suitable mix of uses is sought in order to enhance and deliver growth in this key location whilst helping the borough meet its housing targets.	Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the de-designation from SIL and the introduction of co-location on this site. Based on these considerations, the capacities have been amended to reflect planning consent granted for the site and the pre-application for the remainder of the site. Optimal capacity for the Juno Way part of the site will be established at planning application stage through a design led approach.	Surrey Canal Road and Trundleys Road site allocation capacities amended to increase residential to 274 (using ratio of 2.5:1 for PBSA) and increase employment to 2,890m^2.
	3	LNA SA06	As above, Trundley's Road is the subject of a draft site allocation (no. 6 Strategic Industrial Land (SIL) at Surrey Canal Road and Trundely's Road). The draft allocation is for "Comprehensive employment-led development. Co-location of compatible commercial, residential and complementary main town centre uses". The draft site allocation sets out the following: *The site is situated within the Surrey Canal Road Strategic Industrial Location, on the south side of Surrey Canal Road and adjacent to Folkestone Gardens. The site functions in isolation of the remaining SIL land by virtue of a railway line that creates a physical barrier at the western edge. It is occupied by a mix of industrial units and associated yard space, a scrap yard, and a small terrace of retail and residential uses at the southernmost end along Trundleys Road. Redevelopment and site intensification, along with the co-location of commercial and other uses, will deliver high quality workspace that forms part of a new employment-led mixed use quarter, together with the Apollo Business Centre SIL and Neptune Wharf MEL sites. Replacement provision of SIL land will be made at the Bermondsey Dive Under site. Development will also enable public realm enhancements to improve the walking and cycle environment as well as the amenity of Folkestone Gardens and neighbouring residential areas.*	Comments are noted. Mixed use development is deemed acceptable on this co-location site. Support for de-designation of SIL and re-designation as LSIS at Trundleys Road is noted. Support for compensatory SIL at Bermondsey Dive Under is noted.	Site allocation has been amended to state: co-location of compatible commercial, residential and purpose built student accommodation – to reflect the granted permission for the site.

			Overall I am supporting of the de-designation of the Trundley's Road site from SIL. However in the first instance I maintain the position that a mixed-use development including residential could come forward on the site even without the de-designation from SIL. This is on the basis that the site is not a typical SIL site in terms of its existing land uses, location and context. Firstly, the site is currently occupied by a range of uses, including a row of vacant terraced shops with residential accommodation above. Moreover, this part of the SIL designation has been identified to be amongst the poorest quality in terms of environment and functionality. Therefore the principle of mixed-use development including residential on the site should be considered acceptable given the site's current characteristics. Notwithstanding this, I am supportive of the draft site allocation and overall approach to industrial land, including the designation of compensatory SIL at Bermondsey Dive Under. The draft site allocation is for comprehensive employment-led redevelopment. Co-location of compatible commercial, residential and complementary main town centre uses. I consider there should…[The remaining text to this representation could not be located at the time this document was published]		
Millwall Football Club (CBRE Ltd obo)	- 3	General LNA SA 08	**LEWISHAM LOCAL PLAN - REGULATION 18 STAGE "MAIN ISSUES AND PREFERRED APPROACHES" (JAN 2021)** CBRE is appointed by Millwall Football Club ('MFC'), in respect of their land interest which falls within the adopted Surrey Canal Triangle Mixed-use Employment Location, to submit representations to the Lewisham Local Plan - Regulation 18 stage "Main Issues and Preferred Approaches" (Jan 2021) – hereafter 'the Draft Plan.' We appreciate that the Draft Plan is at a relatively early stage in respect of the formulation of detailed policy requirements for individual site allocations. We trust that the comments set out in this response will be taken into consideration as the detail of the site allocation evolves, and we look forward to working with Officers to achieve this. At this stage of the plan-making process we have not provided a detailed response on the individual Development Management policies within the Draft Plan but reserve the right to comment on these as they are further refined at the Regulation 19 stage.	Support and comments noted.	No change.
Millwall Football Club (CBRE Ltd obo)	- 3	General LNA SA 08	As stated above, the principal response from MFC is one of support for the Draft Plan insofar as assisting in providing guidance and direction on a complex regeneration project. The overriding theme of the comments below is to ensure that the development potential of the site is maximised whilst ensuring that this does not compromise the ability for MFC to continue to operate at the site.	Comments noted.	No change.
Millwall Football Club (CBRE Ltd obo)	- 3	General LNA SA 08	We trust that the comments set out in this response are useful for evolving the detail of the site allocation. We would be grateful if you could confirm receipt of these representations and, as a major stakeholder within the Draft Plan area, would welcome further discussion with you to address the comments raised in these representations ahead of the next iteration of the Draft Plan.	Comments noted.	No change.

Millwall Football Club (CBRE Ltd obo)	- 3	General LNA SA 08	**Background to MFC** MFC currently competes in The Championship, the second tier of English football. MFC has a long and established history, set up in 1885. From 1910 until 1993 MFC played at what is now known as 'The Old Den' in New Cross, before moving to its current home stadium, 'The Den', in South Bermondsey. Since their move to The Den over 25 years ago, MFC has played most of their competitive football between The Championship and League 1. The last few seasons have brought continued success for MFC, securing promotion to the Championship in 2016/17 and finishing just outside of the playoffs in two of the last three seasons. MFC's aspirations on the pitch are met with aspirations off the pitch with plans to expand, enhance and improve the existing stadium. At the time of writing, MFC is sitting in 10th place in the Championship and once again is pushing for promotion to the Premier League. In its current condition, The Den would not meet the requirements set by the Premier League Regulators and in this sense the aspiration of MFC on the pitch could be potentially stunted due to the current stadium infrastructure. To ensure that MFC remains competitive it is essential that it is able to expand and improve facilities to meet its growth potential and ambitions. Beyond the stadium itself, MFC has a long-established presence in the area and with the community, and strongly supports the principle of regeneration where this supports the needs of the football club and the local community.	The supplementary information is noted.	No change.
The Renewal Group (Carney Sweeney obo)	- 3	General LNA SA 08	**Representations on behalf of The Renewal Group** We act on behalf of The Renewal Group who are the developers of the New Bermondsey site (part of the Surrey Canal Triangle site) in the northern part of the London Borough of Lewisham. The representations below are made having regard to the development of this site.	Comments noted.	No change.
The Renewal Group (Carney Sweeney obo)	- 3	General LNA SA 08	We are very happy to liaise with you further in relation to the above representations as part of the evolution of the Local Plan.	Comments noted.	No change.
Millwall Football Club (CBRE Ltd obo)	3 3	LNA SA 08 Paras 15.54 and 15.55	**Principal Comments on the Draft Plan** (1) Importance of Enabling Development Bullet Point 2 of Paragraph 15.55 states *'development must capitalise on the opportunities presented by Millwall FC Stadium, including options for its re-provision and expansion, helping to secure the long-term future of the football club in the Borough'.* Whilst we fully support this principle, further clarity is required in the Draft Plan policy to guide how this will be achieved. For the avoidance of doubt, 'in the Borough' needs to be replaced with 'on this site', to avoid any ambiguity as to the location of the Club. A key part of the viable future for MFC is its ability to use its site to help drive additional income and revenue to support the required upgrades needed to the stadium. It thus is a fundamental aspect of the deliverability of the allocation (in terms of realising the long term future of the MFC) to ensure that as part of any stadium-led redevelopment MFC is able to also promote other uses (such as	Support is noted. Agree that the future location of the club should be clarified. The Local Plan already provides indicative site capacities that does not artificially constrain development. Optimal capacity for the site will be established at planning application stage through a design led approach. Disagree that Opportunities should	Surrey Canal Triangle site allocation amended by replacing "in the borough" with "on this site".

			residential and commercial) that act as *'enabling development'*. At present, the Draft Plan (and the site-specific SPD) provide no indication of how the indicative housing figure of 3,600 would be distributed across the allocation. The principle of 'enabling development' is common in developments such as this, particularly for football teams outside of the top tier of English football. The GLA Stage II report1 into the expansion of the Brentford Football Stadium refers to enabling development no fewer than 29 times, with the Stage II Report summarising *'the fact remains that the quantum and nature of the enabling housing development is required in the form proposed in order to create the level of revenue required to subsidise the cost of the stadium'*. Left unaddressed (i.e. if the Draft Plan remains silent on the distribution of housing across the allocation), the potential consequence is that the available capacity for other uses on the site (i.e. residential, commercial) is absorbed within the wider allocation, on land outside the control (and benefit) of MFC. This in turn introduces a risk of diluting MFC's ability to pursue its own enabling development works to subsidise and release the capital required to deliver the stadium works. MFC requires enabling development to fund the proposed works. A key requirement of the allocation is to support the long-term future of the Club, and it is therefore essential for the Draft Plan to expressly deal with the distribution of housing (and other uses) across the allocation, to provide for the enabling development. If development is not appropriately distributed across the landownerships in the allocation the required improvements to the stadium, itself a key centre piece of the wider regeneration, will not materialise. It is likely that the ambitions for the whole site will be secured by two or more schemes, so the distribution of land use and quantum needs to be considered carefully. Fundamentally, the residential quantum should be seen as indicative so as to not artificially constrain development across the whole site. In addition to being a benefit to MFC this is also required to provide clarity to other landowners within the allocation. The clarity provided through this revision will also be of benefit to Lewisham in assessing applications that come forward on the site and be consistent with Paragraph 16d of the NPPF (2019) which states: *'plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.'* The need for enabling development is inferred in Paragraph 15.54 in which it is stated *'with the creation of a new high-quality mixed-use quarter and leisure destination that will help to secure a viable future for Millwall FC within the Borough.'* However, a much more direct reference is required in the site allocation policy to ensure that the development capacity in the allocation can be utilised, at least in part, on the land interests held by MFC. We look forward to working with Officers to agree the exact wording to capture this but suggest that as a minimum, the text included below would represent an appropriate starting point. *15.54: Comprehensive redevelopment of the site is integral to supporting regeneration in the area, with the creation of a new high-quality mixed-use*	specifically mention enabling development. Disagree that the redevelopment of the site should not seek to provide a policy compliant tenure split.	

			quarter and leisure destination that will help to secure a viable future for Millwall FC within the Borough. The delivery, distribution, tenure and quantum of land uses in the site allocation will facilitate enabling development to support works to the stadium. In respect of soundness tests the change is required to ensure that the policy is effective in meeting the strategic priorities of the Plan. The emphasis in the allocation on the need for enabling development to facilitate delivery of the required works to the stadium also allows for this to be considered, alongside competing policy requirements, as part of the overall planning balance. For example, in delivering the objectives to improve the stadium it may be difficult to viably do this whilst simultaneously providing a policy compliant tenure split. The reference to tenure as suggested above would allow considerations such as this to be considered in the overall planning balance and against the objectives of what the allocation (and Draft Plan more broadly) seeks to achieve.		
Millwall Football Club (CBRE Ltd obo)	3	LNA SA 08	In addition, as a strategic site allocation the need to be clear on the viability position for the policy (through express reference to the need for enabling development) is consistent with the approach taken in the Planning Practice Guidance2: *Why should strategic sites be assessed for viability in plan making?* *It is important to consider the specific circumstances of strategic sites. Plan makers can undertake site specific viability assessment for sites that are critical to delivering the strategic priorities of the plan. This could include, for example, large sites, sites that provide a significant proportion of planned supply, sites that enable or unlock other development sites or sites within priority regeneration areas.* Initial viability work that has been undertaken to support the proposed works to the site has emphasised the criticality of a required quantum of development to be associated with the MFC proposals if it is to be viable. Ahead of the publication of the Regulation 19 version of the Local Plan we would welcome the opportunity to further test this with Officers so that the wording used in the strategic allocation can be informed by the specific circumstances of this strategic site, consistent with the PPG.	Prior to the Regulation 19 version of the Local Plan the council has met with the landowners to discuss potential development of the site.	No change.
Millwall Football Club (CBRE Ltd obo)	3 3	LNA SA 08 Para 15.55	**1) Relationship to the SPD** MFC has previously submitted representations to the Surrey Canal Triangle SPD. Bullet Point 1 of Paragraph 15.55 of the Draft Plan states that development '*must be delivered through a site wide masterplan, in accordance with the Surrey Canal Triangle SPD.'* Whilst we support the principle of the SPD to guide the development proposals on site, it in itself is not a Development Plan document. However, the language used in the Draft Plan (itself a Development Plan document) elevates the level of conformity expected in the SPD with it stated that the masterplan must be delivered in accordance with the SPD. The Planning Practice Guidance (PPG) is clear on the relationship between SPDs and Local Plans. As stated: *'Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not*	Agree that clarity is needed in relation to the SPD.	Surrey Canal Road MEL site allocation amended by referring to proposals having regard to the overarching vision and development principles set out in the SPD, instead of stating they must be in accordance with it.

			form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.' Additional flexibility should be introduced in the text to state that the relationship between the Development Plan policy and SPD guidance is clear. The policy can refer to the need for any proposals to have regard to the principles/ overarching vision of the SPD but should stop short of requiring that they 'must be' in accordance with it.		
Millwall Football Club (CBRE Ltd obo)	3 3	LNA SA 08 Para 15.56	**(3) Club's Future** We welcome reference within the site allocation that *'the layout of the site should ensure that Millwall FC Stadium can continue to function as a large spectator destination on a long-term basis. This includes appropriate arrangements for access, servicing and evacuation'.* We suggest that in the next iteration of the Draft Plan that this is expanded upon to provide further context on this point. The ability for MFC to operate safely and securely is paramount. The need for safe operations at the stadium has been heightened following proactive and conscious efforts recently to reduce terrorism risk associated with large spectator events. In addition, the current Covid-19 pandemic has further heightened the need for additional measures to be introduced in order to ensure the safe operations of football stadiums. Both of these components are integral parts for how development is progressed at New Bermondsey. It will be essential that forthcoming applications in the site allocation are considered in respect of these issues to ensure that MFC can continue to function as a large spectator destination on a long-term basis. The nuances of planning development around a football stadium are unique and not typically captured in more general planning policies or development management policies; this highlights the need for the site allocation to be clear on the operational needs of MFC from the outset to ensure that development is brought forward in a manner that preserves the key objective to ensure that MFC can continue to function as a large spectator sport on a long term-basis. As drafted the policy could be misinterpreted as simply requiring the current functions in respect of access, servicing and evacuation to be maintained on a longer-term basis. In reality the policy needs to address (if it is to deliver upon its objective) the need for appropriate land/routes to be safeguarded to ensure that the longer-term expansion and improvements to The Den are not precluded or prejudiced in any way. This primarily centres around ensuring that the stadium has the ability to become 'Premier League Compliant' (which it is not currently). Given that this is core to policy and its implementation, the policy should include reference in its supporting text to the need to ensure that proposals brought forward in response to the site allocation must not prejudice the ability of any future stadium expansion to be realised. In addition to providing clarity in respect of access, servicing and evacuation, it is important that the policy provides clear direction as to what will be considered through the development management process. Whilst tall buildings are	Agree that that the longer-term expansion of the stadium should not be prejudiced and that construction and delivery on the site should assume the ongoing, continuous operation of the football club. No need to reference excessive shadowing and/or the wind tunnelling effects of tall buildings, as these will be assessed as part of planning applications.	Surrey Canal Road MEL site allocation amended by ensuring development must not prejudice the ability the f stadium to expand and to allow for the ongoing operation of the stadium during construction of the surrounding land.

			supported in principle on site (see 'Development Quantum' below) at the application stage evidence should be provided to demonstrate that excessive shadowing and/or the wind tunnelling effects of tall buildings will not affect the operation of the football stadium/ football pitch. These are items that are not expressly covered in the adopted SPD and warrant inclusion in the site allocation given their strategic importance to how development on the site is progressed. It should also be written into the policy that the approach to the construction and delivery on the site should assume the ongoing, continuous operation of MFC at The Den with no requirement for them to relocate during the works. This is currently missing from the wording of the site allocation.		
Millwall Football Club (CBRE Ltd obo)	3 2	LNA SA 08 Paras 15.53 and 15.55	**(4) Consistency of Proposals** The future Draft Plan should be clear on what is anticipated for the stadium. At Paragraph 15.55 the expansion of the stadium is appropriately noted, whereas 15.53 simply refers to *'retention or re-provision of the football stadium.'* The site allocation should be clear that its aspiration is for the retention, enhancement and expansion of the football stadium in this location.	Agree that the site allocation should refer to retention, enhancement and expansion of the football stadium.	Surrey Canal Triangle MEL site allocation amended by referring to retention, enhancement and expansion of the stadium.
Millwall Football Club (CBRE Ltd obo)	3 3 2 2	LNA SA 08 Para 15.56 QD 04 QD 06	**(5) Development Quantum** We support the inclusion in the site allocation that the proposed development quantum is indicative. This ensures consistency with draft policy DQD6 Optimising Site Capacity. We would, however, suggest that the text is amended as it relates to tall buildings. Whilst we agree that it is for the design-led process to inform the location of taller buildings on the site, the principle of tall buildings as a component of how the allocation is to be delivered must be acknowledged. Strategic Site Allocation 3 within the adopted Core Strategy (2011) provides for a strategic scale development that suggests the principle of tall buildings is acceptable in this location. Core Strategy Policy 18 identifies the location and design of tall buildings, and states (inter alia) that these may be appropriate in specific locations identified by the Lewisham Tall Buildings Study, and these locations include Surrey Canal Triangle. The principle of tall buildings is established within the adopted site-specific SPD (2020) which states on Page 52 that *'given its location within a Regeneration and Growth Area tall buildings are suitable within the SPD Area'.* The principle of height is also established through Renewal New Bermondsey Two Limited's consent. In December 2020, the Secretary of State issued (further) Directions to the Mayor in respect of the London Plan, which included to strengthen the need for Policy D9 (Tall Buildings) to ensure such developments are only brought forward in appropriate and clearly defined areas, as determined by the boroughs. The Mayor has now adopted the New London Plan (2021), including the requisite amendments, to reflect the principle that boroughs should determine the location of tall buildings (as defined locally), and identify these on maps in Development Plans. At present, Paragraph 15.56 states *'the potential for tall buildings should be explored through the design-led process, taking into account protected views and vistas, including the panorama of the Bridge over the Serpentine'.* For the avoidance of doubt, the site allocation needs to expressly confirm that it is an	Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Local Plan.	Local Plan amended to reflect Tall Buildings Study. Surrey Canal Triangle MEL site allocation amended to specifically refer to the site being a suitable location for tall buildings.

			appropriate location for tall buildings, and this is essential in order to achieve the strategic ambitions specific to this location, particularly taking into account the need to accommodate open space provision, stadium expansion, leisure development and so forth. This will help to ensure consistency with the New London Plan policy on tall buildings, and in the interests of ensuring a justified policy and one that is clear (consistent with Paragraph 16d of the NPPF 2019).		
Millwall Football Club (CBRE Ltd obo)	3 3	LNA SA 08 Para 15.55	**(6) Infrastructure** We suggest that the 3rd from last bullet point of 15.55 is updated to set out that it is expected, as per CIL 122 Tests, that reasonable and proportionate contributions will be made to this infrastructure project. At present the text currently reads *'Provision for the new transport infrastructure, including a new Overground station at Surrey Canal Road and accompanying walking and cycle bridge.'* We assume that the text is referring to the fact that the provision of this infrastructure will be made for within the red line of the site allocation as opposed to a requirement for the site allocation to deliver this project (including its funding). This clarification should be provided for in the revised site allocation wording.	PROVIDE CLARIFICATION Agree that the current wording relating to contributions is ambiguous.	Surrey Canal Triangle MEL site allocation amended to clarify the transport infrastructure required on-site and that this is subject to partnership working with other providers.
Millwall Football Club (CBRE Ltd obo)	3 3	LNA SA 08 Para 15.55	**(8) Millwall Community Trust** The site allocation as drafted is silent on the Millwall Community Trust (MCT). The adopted SPD includes provisions for this use to be retained on site. Given the importance of the MCT to the local area we suggest that the requirement to safeguard this use is included as one of the key development requirements as set out under 15.55. At present the text states *'Development proposals must demonstrate a comprehensive and coordinated approach to supporting healthy communities by integrating new and enhanced publicly accessible sports, leisure and recreation opportunities, including open spaces and community facilities, in line with Policy CI 1 (Safeguarding and securing community infrastructure)'*. We suggest that this is expanded to state that the development on site should demonstrably support the longer-term future of the MCT within the allocation. The need to provide for the long term future of the Millwall Community Scheme is included in the existing Core Strategy and should be brought forward into the New Local Plan.	Agree that Millwall Community Scheme should be referenced in the Local Plan.	Surrey Canal Triangle MEL site allocation amended by making reference to the long term future of the Millwall Community Scheme.
The Renewal Group (Carney Sweeney obo)	3	LNA SA 08	**Site Allocation 8: Surrey Canal Triangle Mixed Use Employment Location** The details in the allocation need to be updated, for example in relation to the following: • The current use of the site is far more than just a football stadium and industrial uses. The full extent of uses on the New Bermondsey site is provided in Renewal's recent planning application. • A Section 73 application was granted in 2013. • Renewal's planning application is for 3,500 residential units plus a variety of employment floorspace. Development on the Millwall Football Club land and on the Lions Centre would be additional to this. The indicative development capacity figures need to be updated to reflect this. • A "*clear north-south route linking South Bermondsey Station to Bridgehouse Meadows and the new Overground Station"* can only be fully achieved with land beyond the control of Renewal, MFC and the Council. The policy needs to clarify this and not require the developers of the site to provide it in full.	Where no advanced pre-application has taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Site Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the scale of	Surrey Canal Triangle MEL site allocation amended to increase the residential capacity beyond the 3,500 already consented to 4,089 units, (i.e. 589 for LBL land surrounding the stadium), to reduce employment floorspace to 14,253m^2 and to increase main town centre floorspace to 46,469m^2. Surrey Canal Triangle MEL site allocation

			Finally, following final changes to the London Plan prior to its eventual adoption and publication, the allocation text needs to be very clear that this is a suitable location for tall buildings.	development resulting from the planning consent granted for the part of the site owned by Renewal and the need to have regard to the development principles set out in the Surrey Canal Triangle SPD. Based on these considerations, the capacity has been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. Agree that Bridgehouse Meadows is located outside of the site. Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Local Plan.	amended to reference existing site uses, the Section 73 application and improved connectivity to surrounding areas.
WSP (Sainsbury's Supermarkets Ltd obo)	General LNA SA 09	1. We write on behalf of Sainsbury's Supermarkets Ltd (SSL) in response to the consultation of the new "Lewisham Local Plan: Main Issues and Preferred Approaches", under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. 2. SSL owns the Sainsbury's store and petrol filling station at New Cross Gate, as well as the retail warehousing and associated car parking. SSL objects to the proposed current allocation in the new Local Plan as safeguarded land to accommodate the Bakerloo line Extension (BLE), including a new station. SSL have previously strongly objected to Transport for London's (TfL) consultations on the use of their site for the BLE, including the site's identification as a tunnelling worksite. 3. We have reviewed the Regulation 18 "Lewisham Local Plan: Main Issues and Preferred Approaches" document and evidence base and have set out our comments below.	The objection to this site being safeguarded to accommodate the BLE is noted.	No change.
WSP (Sainsbury's Supermarkets Ltd obo)	LNA SA 09	**The Allocation of the Site** 4. The SSL site, referred to in the new Local Plan as the 'Former Hatcham Works, New Cross Road', is currently allocated for 912 residential units, 4,560sqm of employment floorspace and 18,240sqm of 'main town centre' floorspace. The	The supplementary information is noted. The routing of the BLE, and the location of stations and required works sites associated with	No change.

		site is also allocated for *"new and improved transport infrastructure, including land and facilities required to accommodate the Bakerloo line extension"*. 5. The identification of the site as the 'Former Hatcham Works' site is misleading as it does not reflect the current use of the site. The naming of the site appears to be a deliberate attempt to obfuscate the impact of the allocation on the retail that is fundamental to New Cross/New Cross Gate District Centre. We suggest that the site is renamed to the 'New Cross Gate Retail Park' in later versions of the Local Plan. For clarity, we refer to the site as New Cross Gate Retail Park in these representations. 6. The proposed BLE has been promoted by TfL since 2017. The proposals have undergone three rounds of consultation. SSL has submitted representations to each of these consultations (dated April 2017, December 2018 and December 2019). 7. Based on the published consultation information and supporting evidence, SSL strongly objected to the location of the new BLE station at New Cross Gate Retail Park and the use of the site for tunnel launching and as a works site. This objection still stands. 8. SSL is deeply concerned at TfL's lack of genuine consideration of the concerns raised and the rights of Sainsbury's as the landowner and long-standing employer and business within the community. SSL has engaged with TfL at each formal consultation opportunity to identify issues and concerns regarding the BLE plans in respect of New Cross Gate Retail Park. Detailed objections have been submitted, supported by extensive technical evidence set out as follows: ▪ A Socio-economic Assessment, prepared by WSP (formerly WSP | Indigo) (**Appendix A**); ▪ A Retail Impact Assessment, prepared by WSP (formerly WSP | Indigo) (**Appendix B**); ▪ Tunnel engineering advice provided by Dr Sauer and Partners (**Appendix C**); and ▪ A Transport Appraisal prepared by Intermodality (**Appendix D**). 9. In making detailed representations, SSL has previously identified fundamental short, medium and long-term adverse impacts that will affect their site at New Cross Gate and the New Cross/New Cross Gate District Centre and the credibility of the BLE proposals. 10. The December 2019 consultation was the first time the location of the New Cross Gate station was explicitly included in the public consultation and TfL acknowledges that the store will have to close as a result of the BLE proposals. In previous public consultations, TfL indicated that the store could continue to trade. 11. SSL remains firmly of the view that the previous TfL consultation responses were made based on misleading and incomplete information which failed to fully convey the impact of the new station being located at New Cross Gate Retail Park. It appears that the allocation in the new Local Plan reflects TfL's preferred	constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	

		strategy and has not considered the impacts of the permanent closure of the Sainsbury's store on (inter alia) the vitality and viability of New Cross/New Cross Gate District Centre and the socio-economic impacts of the associated job losses. 12. The BLE is central to the new Local Plan and its spatial strategy. Therefore, in order for the Local Plan to meet the soundness tests required, the Council needs to be certain on the deliverability of the BLE and the sites TfL has chosen for stations and tunnelling. 13. SSL has provided clear evidence which demonstrates, not only that there is no robust business case for the BLE, but that the choice of the New Cross Gate Retail Park for a station and as a tunnelling site will result in adverse impacts on the local community and area.		
WSP (Sainsbury's Supermarkets Ltd obo)	LNA SA 09	14. In summary, SSL's concerns are as follows: ▪There is no evidence of a robust and transparent business case for a capital intensive and disruptive infrastructure project such as the BLE. The project should be halted pending the publication of a robust business case; ▪Since it is acknowledged that the delivery of a station at New Cross Gate Retail Park will force the closure of Sainsbury's store, the location of the station at New Cross Gate must be re-consulted upon. Previous consultations assumed that Sainsbury's could continue to trade; ▪The selection of New Cross Gate Retail Park as a station and tunnelling worksite location has not been robustly justified and there has not been proper consideration of alternatives which will have less impact; ▪The selection of New Cross Gate Retail Park as a station and tunnelling worksite has many disadvantages which have not been properly considered or articulated. For example, the closure of the Sainsbury's store will have significant socio-economic consequences for the future of the New Cross/New Cross Gate District Centre which have not been considered; ▪TfL has not appropriately and robustly considered the consequential impact upon the regeneration/development potential of New Cross Gate Retail Park to provide over 1,000 new homes and a new Sainsbury's foodstore, maintaining the continuity of trading during construction and supporting the vitality and viability of New Cross Gate/New Cross District Centre; ▪TfL does not appear to have fully considered other potentially viable options for locating New Cross Gate station, closer to the rest of the New Cross/New Cross Gate District Centre, including on the Goodwood Road site; ▪TfL does not appear to have seriously considered alternative tunnelling worksites to New Cross Gate Retail Park. For example, the Wearside Road Depot is a more appropriate tunnelling worksite; ▪The impact of the tunnelling worksite on a Site of Importance for Nature Conservation (SINC) has not been assessed;	The reasons for objecting to the BLE station and tunnelling works site being located on this site are noted. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.

		▪ There is no evidence that a Strategic Environmental Assessment (SEA) has been prepared to holistically evaluate the effects of the BLE proposals on the environment and social, cultural and economic circumstances; and ▪ There is no evidence that TfL has undertaken a robust cost benefit analysis of the BLE proposal, or indeed that there is a robust business case that justifies the significant public expenditure.		
WSP (Sainsbury's Supermarkets Ltd obo)	LNA SA 09	**Safeguarding of the Site for the BLE** 15. Through their ongoing engagement in the consultation process for the proposed BLE, SSL have reiterated their support in principle for the BLE, **provided the business case is proven**. However, SSL strongly object to their site being identified as a tunnelling worksite by TfL and the site's selection as the location for New Cross Gate Station. 16. As explained, the allocation of the New Cross Gate Retail Park to accommodate the BLE will have significant and unacceptable consequences for the existing Sainsbury's store, its employees and the community which it serves. The allocation results in the loss of the regeneration opportunity presented by the site and the loss of any positive impact on the wider New Cross/New Cross Gate District Centre. 17. The extent of this lost opportunity is demonstrated by the joint planning application that SSL submitted with London Property Developers, Mount Anvil in 2019. The planning application sought to deliver 1,161 homes on the site across two phases, as well as a replacement supermarket, commercial space, placemaking and infrastructure. The Council validated the planning application on 24 January 2020 (LPA Ref: DC/19/114283). However, the application was subsequently withdrawn on 27 February 2020 due to the ongoing uncertainty around the BLE which has blighted the site. 18. Despite this, SSL remains committed to delivering new housing and investment immediately if the allocation for a new station and tunnelling worksite is lifted. 19. As a substantial and highly accessible site, with a PTAL rating of 6, New Cross Gate Retail Park offers a valuable regeneration opportunity with excellent potential for contributing to the delivery of much-needed high quality housing. This is recognised in the emerging Local Plan through its allocation for approximately 912 units alongside employment and main town centre uses. SSL is confident that the site could accommodate more housing than the allocation proposes, given its experience elsewhere where densities in excess of 350 units per hectare have been achieved on sites with a lower PTAL than the New Cross Gate Retail Park site. SSL's proposals can deliver significant beneficial development and investment which will be lost should the site be safeguarded for BLE works.	Comments are noted. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.
WSP (Sainsbury's Supermarkets Ltd obo)	LNA SA 09	**The Lack of a Business Case for the BLE** 20. SSL is concerned that TfL and Lewisham Council are using the new Local Plan to promote a major capital-intensive and disruptive infrastructure project, when no evidence has been provided to demonstrate a robust and transparent business case. SSL has repeatedly asked for information about overall	Comments are noted. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have	No change.

		development costs, including the costs of land acquisition and the wider socio-economic impacts on the community and New Cross/New Cross Gate District Centre, but TfL remains unwilling to discuss or disclose this. If the site is to be allocated and safeguarded in the new Local Plan, it is incumbent on the Council (with the support of TfL) to address this failing. 21. Given that HS2 and Crossrail 1 are both significantly over budget and behind schedule, and Crossrail 2 has been removed as a spending priority for the next decade, it is difficult to understand why TfL continues to press ahead with the BLE without clear evidence of a business case. Indeed, now it is acknowledged that the Sainsbury's store will be forced to close, the effect this will have on the 'business case' should be open to scrutiny. 22. As a result of the COVID-19 pandemic over the past 12 months, there has been a dramatic reduction in journeys on the TfL network which has caused a huge drop in revenue. The Mayor of London has had to request several emergency grants from Central Government in order to keep the capital's transport network running. 23. The Comprehensive Spending Review, submitted to TfL's Finance Committee on 30 September 2020, notes that passenger income fell by more than 90% compared to the previous year. A total of £1.9 billion was given by the Government to help keep the transport network running up until October 2020. The Mayor then sought a commitment of at least £5.65 billion over the remainder of 2020/21 and 2021/22, with £4.9 billion needed to allow the network to keep running and £750 million for the delivery of Crossrail, however this was not granted. 24. On 1 November 2020, TfL received a £1.8 billion bailout from the Government which secured funding until 31 March 2021. On 22 March 2021 an additional £485 million was secured up until 18 May 20211. 25. As such, it is clear that TfL is currently living a "hand-to-mouth" existence, without the ability to secure funding for huge investment projects including the BLE. 26. As part of this Spending Review, TfL has decided that the BLE will not form part of its spending priorities in the next decade. Therefore, there is still no funding secured for the construction of the BLE and the emerging Local Plan needs to account for this uncertainty. 27. If the BLE is not to be delivered for at least the next 10 years (and with the best will, it is likely to be at least 15 years before it is under construction) then a large number of sites within Lewisham Borough will become sterile and will not be able to deliver much needed housing and regeneration in the Borough. 28. Further, there is no guarantee that the BLE will progress after 10 years so development on these sites may be pushed back for 20 or more years which will severely inhibit investment and growth. 29. Since the onset of the pandemic, there has been a significant change in travel patterns, with many people working from home. As normality returns, there will be a need to reassess public transport investment in light of reduced passenger	already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	

		numbers and less pressure on peak travel as people are more flexible with commuting times. 30. The December 2019 TfL consultation stated that an application to the Secretary of State for a TWAO (Transport and Works Act Order) will not be made before 2023. However, on 1 March 2021 the Department for Transport issued a safeguarding direction for the proposed route of the BLE. This includes 'Area of Surface Interest', which includes the whole of the Sainsbury's site and 'Area of Subsurface Interest' which includes the southwest corner of the site. 31. The safeguarding direction does not contain any review or expiry date which creates great uncertainty for landowners, staff employed on the site and the local community, particularly when there is still uncertainty about funding for the BLE and its delivery, even in the long term. 32. To prevent the redevelopment of an available and deliverable brownfield site is unacceptable. There is no certainty that the BLE will ever be delivered. It has no timescale for delivery and no funding. 33. In short, the allocation for the BLE station should be removed until the business case is proven. The desire to accommodate the BLE should not prohibit the significant and immediate redevelopment of the site which would bring substantial benefits to the local community and the Borough as a whole.		
WSP (Sainsbury's Supermarkets Ltd obo)	LNA SA 09	**The Location of New Cross Gate Station** 34. At paragraph 15.58 it is noted that the site can accommodate a new station for the BLE. There is simply no evidence or justification as to why the New Cross Gate Retail Park site is an appropriate site for a new station. 35. The choice of New Cross Gate Retail Park is referred to in TfL's Stations Overview consultation document (2019) as follows: *"In the 2017 consultation we consulted on our proposed site for the station being the site of the retail park lying on the west side of the existing New Cross Gate Rail station. A majority of respondents expressed support for this proposal."* 36. We can find no further or fuller explanation as to why New Cross Gate Retail Park has been chosen by TfL. There does not appear to be any strategic environmental assessment (SEA) undertaken by TfL or any in-depth evidence based analysis, including a cost/benefit analysis to justify this selection. 37. Furthermore, it is misleading to state that a majority of respondents expressed support for the proposal. At that time, TfL did not acknowledge that the existing Sainsbury's store will need to close as a result. 38. Several stakeholders including local councillors (Cllr Charlie Davis and Cllr Liz Johnston-Franklin) have expressed concern over the loss of the Sainsbury's store, particularly in conjunction with the Tesco store in Old Kent Road, including the increased journeys to other supermarkets and the impacts of the closures as local employers. 39. London First, who represent a number of businesses, and Goldsmiths University have also expressed concern over the plans at New Cross Gate. The Civil Service Pensioners Alliance is concerned over the loss of the Sainsbury's	Comments are noted. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.

		store and the impact of a lack of large supermarkets in the area which would result from the works at this site. 40. Finally, none of the TfL consultations have provided any information on how the buses which currently use the Sainsbury's site would be relocated during the construction period of the station. This is a matter about which local people will want to be informed. 41. SSL does not believe that there has been adequate and effective consultation on the location of the station by TfL and the significant socio-economic and retail impacts of the loss of the Sainsbury's store have not been addressed. If the new Local Plan allocates the site for a new station, it will be incumbent upon the Council to undertake this work. 42. The location of the station at New Cross Gate Retail Park as an interchange would be inefficient compared to the Goodwood Road site which is better located in relation to New Cross District Centre and Goldsmiths University, so reducing travel distances and journey times when changing trains.		
WSP (Sainsbury's Supermarkets Ltd obo)	LNA SA 09	**A Tunnelling Worksite at New Cross Gate Retail Park** 46. TfL's preferred location for a tunnelling work site is the New Cross Gate Retail Park site. The new Local Plan does not mention this, only that the site is allocated for 'land and facilities required to accommodate' the BLE. If the intention is that the site is to be a tunnelling work site, this should be made clear in the new Local Plan. There has not been an objective and transparent assessment of the tunnelling worksite location alternatives. 47. Leaving aside the socio-economic impacts of the site being used as a tunnelling work site, SSL also have technical concerns about the appropriateness of the New Cross Gate Retail Park site. 48. A technical note from Dr Sauer and Partners (DSP) is provided at **Appendix C**. This addresses the tunnelling worksite proposals within the current consultation. It confirms that there is no over-riding technical reason as to why the worksite is 'best' located at New Cross Gate Retail Park. Indeed, the opposite is true as the opportunity to move spoil by rail from New Cross Gate Retail Park is very limited. 49. However, DSP confirm that there is an option to accommodate the tunnelling worksite at the Wearside Road Depot, which has been dismissed by TfL due to its size (based upon an arbitrary size of 2.4ha). DSP demonstrate that the site could be expanded beyond the area considered by TfL to provide a suitably sized site, based on TfL's criteria. Indeed, due to the availability of more trains in this location, DSP also identify that the required site size at the Wearside Road Depot could be smaller than that proposed at New Cross Gate Retail Park, as the requirement for spoil stockpiling and storage of tunnel segments would be less with the enhanced accessibility by rail of the Wearside Road Depot site. 50. DSP also confirm that the location of a tunnel launching site at the Wearside Road Depot could significantly reduce the tunnel boring construction programme as it provides far greater locational efficiencies in terms of the requirements for assembly and disassembly of tunnel boring machines.	Comments are noted. Disagree that Wearside Road Depot should be safeguarded and allocated as a tunnelling site. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.

		51. Further technical work has been undertaken by Intermodality. Intermodality have had regard to the implications on the rail network of the associated freight movements required to remove spoil and allow for the loading and unloading of materials. The Intermodality Assessment is provided in full at **Appendix D.** 52. In summary, Intermodality have identified critical gaps in the consideration of worksite options by TfL which undermine the selection of New Cross Gate Retail Park as the primary preferred tunnelling worksite option and raise serious questions over the robustness of TfL's approach. 53. The New Cross Gate Retail Park site sits within a heavily congested part of the London rail network, with very limited slack in the daily scheduling. Heavy freight movements are necessarily slow and have the potential to severely disrupt passenger services. 54. Intermodality confirm that both Wearside Road Depot and Hither Green sites have the potential to be better worksite options because they are located where there is greater network capacity to accommodate freight movements and onward connections to facilitate the disposal of spoil. 55. Furthermore, the capacity of the site to accommodate storage of spoil and other materials is not confirmed; and the risk of interruption to passenger services is far greater, with the associated implications for the surrounding network far more severe. 56. Finally, the tunnelling worksite at New Cross Gate Retail Park will require development of a Site of Importance for Nature Conservation (SINC). The impact on this protected site has not been assessed. 57. It is clear from this work that there are at least two more appropriate sites at Hither Green and Wearside Road. Both represent better alternatives with respect to surrounding rail network capacity and opportunity to overcome constraints. 58. Wearside Road Depot is currently not allocated in the new Local Plan. 59. The analysis by DSP and Intermodality confirms that the Wearside Depot is a better tunnelling worksite than the New Cross Gate site because: ▪ it is located at the southern end of the BLE and thereby allowing the tunnel boring machines to have two drives rather than four if the tunnels were launched from New Cross Gate Retail Park. This has significant construction programme implications; ▪ it is better located to facilitate the removal of spoil by rail, being on a less congested part of the network; ▪ it would have fewer environmental impacts as trains would not be restricted to night-time movements only, and ▪ it would not sterilise a valuable regeneration site with advanced redevelopment plans. 60. For these reasons, if the new Local Plan does make allowance for the BLE, the Wearside Road Depot should be safeguarded and allocated as a tunnelling site.		
WSP (Sainsbury's	LNA SA 09	**The Economic Impact of Closure of Sainsbury's**	Comments and supplementary information	No change.

Supermarkets Ltd obo)		61. The Stations Overview consultation document which formed part of the December 2019 TfL consultation, confirms that TfL is proposing a new station at New Cross Gate Retail Park. It goes on to confirm that: *"At the last consultation we stated that there could be a potential loss of the Sainsbury's supermarket during the construction period. As we have developed our plans for the site to incorporate the primary tunnelling worksite, it has become clearer that the current supermarket, other retailers and petrol station would not be able to remain operational on the site during construction."* 62. It is clear that the allocation of this site for land and facilities to accommodate the BLE will mean that the businesses at New Cross Gate Retail Park will be forced to close. This will have significant negative impact on: Sainsbury's business; the people currently employed on the site; the regeneration of the area in the short term; the wider community; and New Cross/New Cross Gate District Centre. 63. The socio-economic implications of the loss of the Sainsbury's store are explained in full technical detail at **Appendix A.** 64. The socio-economic analysis confirms that the Sainsbury's store and the area surrounding it is within Lewisham's lower super-output areas (LSOAs) that have been assessed as some of the most deprived in England. The existing Sainsbury's store is found to contribute positively to each of the seven domains which constitute the English Indices of Deprivation, including: ▪ Income deprivation; ▪ Employment deprivation; ▪ Education, skills and training deprivation; ▪ Health deprivation and disability; ▪ Crime; ▪ Barriers to housing and services; and ▪ Living environment deprivation. 65. Given the level of deprivation experienced within the New Cross Gate area, it is apparent that the removal of the Sainsbury's store in its current format will detrimentally impact the community and potentially worsen its relative deprivation. 66. It is further estimated that the employment created by the existing Sainsbury's store generates gross value added (GVA) of some £8.7million per annum. This is a permanent economic benefit which will be enjoyed in perpetuity if the store continues to trade and to employ the same number of staff members. This significant figure demonstrates the major contribution of the Sainsbury's store to Lewisham's economy. 67. The analysis also estimates the additional value generated beyond labour productivity. This is referred to as social value, which represents a holistic evaluation of social, environmental and economic effects. Using a national	are noted. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	

		framework for measuring social value, the socio-economic analysis estimates the social value of the store to be £4.8million per annum. 68. These figures are noteworthy given the evident deprivation experienced in the immediate New Cross Gate area, demonstrating the positive contribution of the store to the local community. The removal of the Sainsbury's store in its current format at New Cross Gate will be detrimental and undoubtedly lead to negative socio-economic impacts within the local community. 69. The importance of local retail and access to food has become even more stark during the COVID-19 pandemic. Whilst the pandemic has altered the way people shop and the demand for online retail is growing, we consider that the provision of a supermarket in this location is vitally important for the area and local community. 70. The socio-economic analysis further identifies that there would be an opportunity cost of not delivering redevelopment proposals at the New Cross Gate Retail Park site which will be delayed indefinitely if the site is allocated for the BLE station. It quantifies this as follows: ▪ Gross Added Value of £10.9million per annum, representing an increase of £2.2million per year compared to current operations. Consequently, the cessation of the redevelopment plans and removal of the current store operations would see a loss of over £11 million each year. This is a conservative figure as it fails to account for other jobs that would be lost from other businesses operating in the immediate area who rely on the Sainsbury's store as an 'anchor store' for the New Cross/New Cross Gate District Centre; ▪ The important contribution of the proposals to local housing need targets and the boost to local population which would generate circa £3.6 million for convenience expenditure and £6.5 million in comparison expenditure available to be spent within the New Cross/New Cross Gate District Centre; ▪ The boost to the New Cross/New Cross Gate District Centre turnover through an enhanced store, expanded Groceries Online (GOL) services and improved links with the adjoining District Centre. The enhanced GOL services (which have now been consented under LPA ref. DC/20/118401) are estimated to improve store turnover by £11m as well as having considerable sustainability benefits, including the reduction in car use and the flow on impacts of this on traffic, road incidents and air quality in the local area; ▪ Improvement in the shopping environment allowing for positive impacts on the New Cross/New Cross Gate District Centre; ▪ Continued promotion of active transport through the convenience offered by an accessible supermarket located within the surrounding neighbourhood; and ▪ Additional job creation through the construction required for the scheme. 71. In summary, the benefits associated with the regeneration of the New Cross Gate Retail Park site are extensive and would directly benefit the local economy,		

		increase the housing stock and enhance community accessibility to vital services and infrastructure. 72. Following consideration of the published information relating to options assessments, including station site selection undertaken by TfL, the socio-economic assessment concludes that although work has been undertaken by TfL to assess the costs and benefits of the BLE project and the location of the New Cross Gate station, the research and subsequent analysis does not account for the wider value and contribution to the local community of the existing Sainsbury's store. In particular, it fails to capture the potential benefits of the Sainsbury's redevelopment proposals which seek to drive additional value to the local community as explained above.		
WSP (Sainsbury's Supermarkets Ltd obo)	LNA SA 09	**The Retail Impact of Closure of Sainsbury's Store** 73. Concern over the loss of the retail facilities at the Sainsbury's site in New Cross Gate have been raised in previous TfL consultations, not only from SSL, but from members of public in response to the consultation process. 74. This issue has been examined in greater technical detail by WSP (formerly WSP | Indigo), who have undertaken a detailed Retail Impact Assessment (RIA) in October 2019. The RIA is appended in full at **Appendix B.** 75. Assessing the impact of a number of scenarios, the RIA determines that the worst-case scenario for the New Cross/New Cross Gate District Centre is the loss of the Sainsbury's store for ten plus years. **This would result in the reduction of the District Centre's turnover by some £55m, an impact of -73%.** This is undoubtedly a significant adverse impact in terms of the performance of the District Centre that will fundamentally undermine its role and function within the retail hierarchy and seriously impact on its health, vitality and viability. 76. Furthermore, the RIA identifies that the loss of the Sainsbury's store will have significant implications in terms of access to essential grocery needs for many local residents, particularly those who rely on public transport; loss of jobs, which will also largely be felt by local residents; the unsustainable shopping patterns it will create, and the adverse highways impacts as a consequence of the closure of a popular store, diverting demand and trips to more distant stores; and the loss of in-store facilities and opportunities, including the pharmacy, Explore Learning and the local charitable benefits that are delivered through Sainsbury's commitment to supporting their local communities. 77. The pandemic has shown how important it is for the community to have access to affordable food and essential products, in close proximity to where they live. Stores such as the New Cross Gate Sainsbury's are more important than ever as they provide a huge range of products and are situated at the heart of the community, within the District Centre. 78. The range and extent of quantitative and qualitative impacts identified represent a fundamental conflict with national and local planning policy (including the NPPF and the adopted London Plan) to support town centres, facilitating their growth, diversification and adaptation to meet the needs of their local communities.	Comments and supplementary information are noted. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.

		79. The Council's retail evidence base, the Lewisham Retail Capacity Study 2019 Update supports the findings of the RIA at Appendix B. The Retail Study Update recognises the importance of the existing Sainsbury's store in New Cross/New Cross Gate District Centre. Paragraph 2.20 of the Retail Study Update states that the household survey found that the Sainsbury's store was one of the most popular destinations for convenience goods shopping for residents in the survey area, recognising that it is a well-used store helping to meet the shopping needs of local residents. As such, the redevelopment of the site would mean that those residents who currently shop at the store would have to travel to stores further afield to undertake their main food shopping. 80. Furthermore, Table 5 of the Retail Study Update highlights the importance of the Sainsbury's store to the vitality and viability of the New Cross/New Cross Gate District Centre. Table 5 shows that the current Sainsbury's store accounts for approximately 70% of the District Centre's convenience turnover. As such, the loss of the Sainsbury's store will significantly reduce the turnover of the District Centre and have a significant adverse impact upon it.		
WSP (Sainsbury's Supermarkets Ltd obo)	LNA SA 09	**Former Hatcham Works, New Cross Road** 85. The site should be identified as New Cross Gate Retail Park, or the Sainsbury's site. The reference to the Former Hatcham Works is misleading for the reasons set out above. 86. The reference to the BLE should be removed from the allocation. The site should be allocated for mixed use development to provide a new Sainsbury's store, a minimum of 912 new homes and employment and 'main town centre' floorspace for delivery in the first five years of the new Plan period.	Disagree. Hatcham is well recognised by the local community and is part of the heritage of the area, being reflected in the name of the nearby Conservation Area. Disagree that reference to the BLE should be removed from the Local Plan. Whilst the planned growth within the Local Plan is not predicated solely on the delivery of the BLE, the Council fully supports this important transport infrastructure project that will be critical to the borough in the future. Furthermore the routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government.	No change.
WSP (Sainsbury's Supermarkets Ltd obo)	General LNA SA 09	89. We trust that these representations will be fully considered by the Council, and that the next iteration of the new Local Plan amended accordingly to ensure that SSL's New Cross Gate Retail Park site can be brought forward for much needed regeneration in the short term.	Comments noted.	No change.

WSP (Sainsbury's Supermarkets Ltd obo)	General LNA SA 09	*LB Lewisham officer note: The submitted response is also accompanied by four appendices.* - *Appendix A: Cost benefit Analysis for Bakerloo Line Extension.* - *Appendix B: Sainsbury's New Cross Gate, New Cross, Lewisham Retail Statement including Appendices 1, 2 and 3.* - *Appendix C: Review of tunnelling aspects presented in TFL's public consultation documents with a focus on New Cross Gate.* - *Appendix D: Review of proposed work sites for construction: rail accessibility.*		The supplementary information is noted.	No change.
WSP (Sainsbury's Supermarkets Ltd obo)	3	LNA SA 10	**Goodwood Road and New Cross Road** 87. If reference to the BLE is to be retained in the new Local Plan, the Goodwood Road and New Cross Road site should be allocated to accommodate a new station to serve the BLE. Wearside Road Depot. 88. If reference to the BLE is to be retained in the new Local Plan, the Wearside Road Depot site should be safeguarded or allocated as a tunnelling work site for the BLE.	Comments are noted. Disagree that Wearside Road Depot should be safeguarded and allocated as a tunnelling site. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.
WSP (Sainsbury's Supermarkets Ltd obo)	3	LNA SA 10	**The Goodwood Road Site** 43. Goodwood Road is allocated for a mixed-use scheme including 112 new houses. SSL are firmly of the view that this is a more appropriate and suitable site for a station for the BLE. 44. Not only will the Goodwood Road site allow for a better interchange between the BLE and rail and bus services, it is a more appropriate station location because: - it will have significantly less social and economic impacts, and less cost; - it has been vacant for many years and is deliverable; - it has better access to other services within the New Cross/New Cross Gate District Centre; - it will, through Goodwood Road, have an acceptable access route which would not undermine the surrounding highways network; - it will have the least impact in terms of job losses; - it will have the least impact on the local community because there will be no loss of key shopping facilities; - it will have the least impact in terms of the loss of delivery of new homes; - it will have the least impact upon the vitality and viability New Cross/New Cross Gate District Centre; and - it will allow a vital regeneration scheme to come forward at New Cross Gate Retail Park which will deliver a new Sainsbury's store (with no	Comments are noted. Disagree that Wearside Road Depot should be safeguarded and allocated as a tunnelling site. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.

			closure during the development phase). SSL's site will deliver at least 912 new homes compared to 112 at Goodwood Road. 45. In short, the most sustainable and appropriate location for a new station for the BLE is the Goodwood Road site. This site should be identified as the preferred location for a new BLE station.		
Cockpit Arts (The Planning Lab obo)	- 3	General LNA SA 14	**Lewisham Local Plan January 2021 | Consultation response from Cockpit Arts, 18-22 Creekside, Deptford SE8 3DZ** Cockpit Arts, Creekside, Deptford, is pleased to respond to the consultation on Lewisham's new Local Plan (main issues and preferred options). We are a charity that provides studio spaces and business development support for makers at affordable rent levels. We have two principal sites; one in Holborn, and one in Deptford. We have occupied our Deptford site since 2001, where we accommodate more than 60 makers in our small workshop spaces. Cockpit Arts is a leading resident of the creative community of Lewisham, enjoying an international profile and reputation which sees us regularly delivering overseas programmes and welcoming visitors from around the globe who want to learn from our model.	The supplementary information is noted.	No change.
Cockpit Arts (The Planning Lab obo)	- 3	General LNA SA 14	Overall, Cockpit Arts is supportive of the aims of the plan and many of the specific policies, including those that aim to protect and enhance a wide range of creative and cultural uses in the borough. We have provided our responses in relation to individual topic areas/policies in a table, below.	Support noted.	No change.
Cockpit Arts (The Planning Lab obo)	- 3	General LNA SA 14	Notwithstanding this key concern, we suggest some ways – below - in which this and related policies in the new Plan could be strengthened to support the development of sites in line with policies in the Plan where different developers are involved on different timescales. We would be very happy to discuss any of the issues we have raised here further with Officers at LB Lewisham as the new Plan is progressed to the next stage.	Comments noted.	No change.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	- 3	General LNA SA 14	**LEWISHAM LOCAL PLAN REGULATION 18 STAGE MAIN ISSUES AND PREFERRED APPROACHES DOCUMENT FORMAL CONSULTATION** **REPRESENTATIONS SUBMITTED ON BEHALF OF BELLWAY HOMES LTD AND PEABODY DEVELOPMENTS LTD** We are instructed by Bellway Homes Ltd ("Bellway") and Peabody Developments Ltd ("Peabody") to submit representations to the Lewisham Local Plan Regulation 18 'Main Issues and Preferred Approaches Document' January 2021 ("the draft Local Plan") in the context of their landownership and live planning application at Sun Wharf, Creekside, Deptford, London, SE8 3DZ ("the site"), located within the London Borough of Lewisham (LBL).	Comments noted.	No change.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA SA 14	These representations relate to the site at Sun Wharf which forms part of the proposed site allocation **'14: Sun Wharf Mixed-use Employment Location'** within the draft Local Plan. *LB Lewisham officer note: A site plan is included in the original representation. The plan shows the site outlined in red.* (Drawing No. 3336A-PL(90)_00_P01). These representations also relate to the wider policies of the draft Local Plan.	Support and comments noted.	No change.

			The site has significant redevelopment potential and we support the site allocation and the principle of development to deliver a mixed use redevelopment comprising new residential uses, including affordable housing and provision of high quality employment floorspace. We have set out our detailed comments in this letter.		
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	- 3	General LNA SA 14	**Background** *Bellway Homes Ltd and Peabody Developments Ltd* Bellway is a major national house-builder, with considerable expertise in delivering homes that people want to live in. Bellway is committed to developing the site who have a track record of working in some of London's key regeneration areas. Bellway has delivered high quality mixed use redevelopment schemes within London and the South East. Bellway has established a particularly strong track record in London and deliver over 2,500 units per year across four divisions. Bellway Thames Gateway alone currently has over 30 active development sites. Whilst many in the development sector have been in financial difficulty in recent years, Bellway have emerged as a strong and well-run business with low debt. Peabody Developments Ltd, a wholly owned subsidiary of Peabody Trust, provides homes and services to more than 111,000 residents and 8,000 care and support customers. Peabody helps people make the most of their lives by providing good quality affordable homes, working with communities and promoting wellbeing. Increasing Peabody's organisational capacity means they will have a development pipeline of over 6,000 affordable homes by 2021. Bellway and Peabody formed a joint venture partnership to deliver the proposed redevelopment scheme at Sun Wharf. *Site and Surroundings* The site measures approximately 0.73 hectares and is located in the northern part of Deptford. The site accommodates existing low-rise warehouse buildings currently in commercial use. The site is bound by Creekside (a local vehicle carriageway) and Cockpit Arts (a creative industries business incubator) to the west, railway arches to the south, Deptford Creek to the east, and Kent Wharf to the north. Kent Wharf is a mixed use scheme, also redeveloped by Bellway that has been completed and comprises 143 residential units and circa 1,300sqm of commercial floorspace. The site predominantly has a Public Transport Accessibility Level (PTAL) rating between 3 and 4 (moderate to good). However the site is better than the standard PTAL rating suggests since it is in close proximity to areas of PTAL 6a and is within walking distance to additional station and bus services. The Environment Agency's Flood Map for Planning indicates that the site is situated within Flood Zone 3, within an area benefiting from flood defences. *Planning Policy Context* The site is subject to the following key adopted (current) planning policy designations:	The supplementary information is noted.	No change.

			• Part of Site Allocation SA11 "Sun and Kent Wharf Mixed use Employment Location"; • Deptford Creek/Greenwich Riverside Opportunity Area as designated by the London Plan; • Deptford and New Cross Creative Enterprise Zone as designated by the London Plan; • Deptford Creekside Regeneration and Growth Area; • Air Quality Management Area; and • Archaeological Priority Area. *Current Application* In the latter part of 2020, Bellway and Peabody submitted a full planning application (Ref. DC/20/118229) for a residential-led, mixed use redevelopment at Sun Wharf proposing 251 homes and creative industry uses together with the delivery of new public realm and landscaping which would deliver on a range of planning and public benefits, including a minimum of 35% affordable housing. The description of development is as follows: *"Demolition of all existing buildings and comprehensive redevelopment to provide 3 new buildings ranging in heights of 3 to 20 storeys to provide 251 residential units (C3 Use Class) and approximately 1,233 sqm flexible commercial floorspace (B1/B8 Use Class) plus 311sqm flexible commercial floorspace (B1/A3) in a container building, together with associated wheelchair accessible vehicle parking, cycle parking, landscaping, play areas, public realm, improvements to river wall and public riverside walkway and associated works."* The application remains under consideration and a determination will be issued by LBL in due course.		
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	- 3	General LNA SA 14	**Lewisham Local Plan Regulation 18 Stage Main Issues And Preferred Approaches Document – representations** We note that the key principles of the adopted Site Allocation is being carried over to the draft Site Allocation as set out in the draft Local Plan. We note the site is subject to the following key planning policy designations: • Site Allocation 14: Sun Wharf Mixed-use Employment Location; • Deptford Creek/Greenwich Riverside Opportunity Area (as designated by the London Plan); • Deptford and New Cross Creative Enterprise Zone (as designated by the London Plan); • Deptford Creekside Cultural Quarter; • Waterlink Way; • Archaeological Priority Area; and • Air Quality Management Area. We have noted the national planning context in preparing Local Plans, and have then commented on the draft Local Plan in detail, as set out below.	Comments noted.	No change.
Bellway Homes Ltd and Peabody Developments	- 3	General LNA SA 14	*National Planning Policy Context* Paragraph 35 of the NPPF (National Planning Policy Framework) states that Local Plans and spatial development strategies are examined to assess whether they	Comments noted.	No change.

Ltd (Savills obo)			have been prepared in accordance with legal and procedural requirements and whether they are sound. Plans are 'sound' if they are: *a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs19; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;* *b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;* *c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and* *d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.* These tests of soundness should also be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies of the area.		
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	- 3	General LNA SA 14	**Public Examination** On behalf of our Client we consider it is necessary we attend the oral part of the Examination in Public. We would be grateful if you could keep us updated. **Conclusion** In summary, our Client supports the principle of the Site Allocation 14 for the redevelopment of the site which would provide significant public benefits including employment and new housing. However, with the suggested amendments we consider that the draft Local Plan would be sound. However, some of the items noted above in their current form would constrain potential redevelopment options and would therefore, **not be effective** in their **delivery** and would **not be consistent** with national policy. Therefore, it is considered that the draft Local Plan is not sound. Please do not hesitate to contact me to arrange a meeting and/or you have any further queries. In any event, we would be grateful if you could keep us updated of the progress with the new draft Lewisham Local Plan.	Comments noted.	No change.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA SA 14	**Site Allocation 14: Sun Wharf Mixed-use Employment Location ("Site Allocation 14")** Fundamentally, our Client fully supports the principle of development for residential and employment/commercial uses for draft Site Allocation 14. Compared to the adopted Site Allocation, we note that the draft Site Allocation boundary has been amended to omit Kent Wharf. We have concluded this is likely to be because Kent Wharf has been redeveloped (by Bellway) and is now completed and occupied. On this basis, the boundary update appears reasonable. We note that the updated boundary for the site allocation therefore includes the remaining land parcels: the Site (i.e. Sun Wharf), as well as well as the adjacent Cockpit Arts site and the adjacent Network Rail arches. In the interests of clarity, the red line boundary and site address should be more explicit that the draft Site Allocation includes the area underneath the Network Rail arches.	Support noted. Agree that the site name should be amended.	Local Plan amended to acknowledge Network Rail arches in site name.

Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA SA 14	As part of the "Indicative Development Capacity" section on page 616 of the draft Local Plan, we note that it states 235 net residential units. Under the current submitted application, 251 residential units are proposed and has been developed via a design-led approach, taking into account the guidelines of the aspirations of the adopted Site Allocation and planning policies. We consider that the drafting should be updated to state 251 residential units, and that it is made explicit that the figure for the residential units is a minimum requirement, and/or starting point. This would ensure that the draft Local Plan is **effective** in its delivery of new homes, as well as affordable homes.	Where no advanced pre-application has taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Site Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the scale of development resulting from the planning consent granted for the part of the site and current application as well as the need to protect the heritage setting of the site. Based on these considerations, the capacity has been amended. Optimal capacity for the site will be established at planning application stage through a design led approach.	Sun Wharf MEL site allocation amended to reduce residential capacity to 220 units and reduce employment floorspace to 1,443m^2.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA SA 14	We also note that the draft Site Allocation provides an indicative development capacity of gross-non-residential floorspace as *"Employment 1,933*". The supporting policy text should make it clear that any quantum of commercial floorspace reflects a design-led approach, and/or that consideration will be also be given to employment densities.	The Local Plan provides indicative floorspace. Optimal floorspace for the site will be established at planning application stage through a design led approach.	Local Plan amended at the start of Part 3 to clarify floorspace is indicative and that employment densities should be taken into account.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA SA 14	We note that the PTAL states between 0 to 3. Whilst we consider that the site ranges between 3 and 4 for the Sun Wharf site, we would consider the text be updated to acknowledge that fundamentally the site has a better than the standard PTAL rating, since it is in close proximity to areas of PTAL 6a and is within walking distance to additional station and bus services and also the Deptford Town Centre.	Disagree, as the site's PTAL is already noted.	No change,
Bellway Homes Ltd and Peabody Developments	3	LNA SA 14	Under the "Site allocation" heading on page 617 of the draft Local Plan, it states *"Comprehensive mixed-use employment led redevelopment…"*. We consider that the drafting should be updated to state *"Comprehensive mixed-use residential-led redevelopment including residential and employment/commercial uses…"*. This would ensure it is consistent with the table on page 618 of the draft Local	Disagree. The focus of the site allocation is on employment-led redevelopment, in order to	No change.

Ltd (Savills obo)			Plan. It would also ensure that sufficient levels of new homes together with new creative industries/local commercial floorspace would promote and encourage vibrancy and activity for this locality and the future redevelopment. This will ensure that the draft Local Plan has been **positively prepared** and **effective** so that it can deliver the optimum number of residential units and commercial floorspace, together with associated new jobs.	support the Deptford Creekside Cultural Quarter	
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA SA 14	We note the inclusion of Creative Enterprise Zone and Cultural Quarter. This is indeed reflective of the creative industries locality and would also align with the aspirations to deliver new creative industries floorspace at the site, and is supported by our Client. Our Client is also supportive of the overall development aspirations for the Site Allocation as set out in the supporting policy text on pages 617 and 618 of the draft Local Plan as they are considered that these aspects are important to the overall regeneration of the site.	Support noted.	No change.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA SA 14	As it relates to tall buildings, we note that paragraph 15.83 states there the potential for taller building elements, and that the taller elements should be located in the south west corner of the site. Whilst this is reflective of the current planning application (and that the principle of tall buildings is supported), it is considered that the policy text is overly prescriptive and should be amended to ensure it is more flexibly drafted i.e. it should simply say that tall buildings and their precise location will be a design-led approach. This will ensure there is sufficient flexibility and that the site is **deliverable,** and would therefore be **effective**.	Agree that a design-led approach should be used when determining the location of tall buildings.	Sun Wharf MEL site allocation amended to incorporate "considered as part of a design-led approach".
Cockpit Arts (The Planning Lab obo)	3 2	LNA SA 14 EC 06	In addition to these responses, we are also keen to draw to LB Lewisham's attention to an apparent conflict between the emerging Local Plan and development activity/proposals within Site Allocation 14, Sun Wharf, in which Cockpit Arts' Deptford building sits. The Cockpit site is currently part of the adopted Local Plan (2013) site allocation SA11; and formerly part of a wider 2014 masterplan scheme that is now being progressed (only in part) by Bellway and Peabody. This includes the redevelopment of Kent Wharf (now delivered) and Sun Wharf, that is subject to a current planning application under consideration (ref DC/20/118229). Under various plans considered, prior to the submission of the current Sun Wharf application, provision was to be made for an expanded Cockpit in a larger and taller building on site. Following Bellway's decision to progress without Cockpit, we are now progressing our own plans for the development of the Cockpit Arts site, which accord with the aspirations of the masterplan and Site Allocation, and that we intend to bring forward in the near future. Nonetheless, we are concerned, having reviewed the draft new Local Plan, that the developments progressed (Kent Wharf) and currently under consideration (Sun Wharf, ref. DC/20/118229) do not reflect the aspirations of emerging Site Allocation 14 – Sun Wharf; or draft Policy EC6. Specific comments are set out in the table below. In summary, Cockpit Arts notes that the current Sun Wharf planning application is residential-led, which is fundamentally at odds with the mixed-use employment-led designation of Site Allocation 14 and Policy EC6. It is highly likely that this scheme will have been determined before the new Plan is significantly progressed, meaning that the redevelopment of the significant	Comments noted. Agree with the points made about co-ordination of applications.	Sun Wharf MEL site allocation amended by referring to partnership working, phasing and Policy DM3 (Masterplans and comprehensive development).

			proportion of this site will not meet the aspirations of this site allocation, rendering it out of date before its adoption. The current Sun Wharf planning application is also not in accordance with the 2014 masterplan for the site, which again appears to conflict with the requirements of the emerging policy for development within Site Allocation 14 to be masterplan-led. This raises serious concerns for Cockpit Arts that development will be progressed that does not recognise/respect the potential for all parts of the site allocation, and which has the potential to limit future development within the site allocation by other owners/developers. Cockpit Arts is keen to understand more about how LB Lewisham plans to manage such conflicts, which could render Site Allocation 14 – and potentially others – null and void in advance of the new Plan being adopted.		
Cockpit Arts (The Planning Lab obo)	3	LNA SA 14	• CA endorses the site allocation as mixed-use employment-led. • We are supportive of the requirement for masterplan-led development, but query how LB Lewisham will reconcile applications currently being determined within the site allocation, i.e. the Sun Wharf scheme, that are not in accordance with a masterplan in any meaningful way. • We would suggest that the specified development capacities are not truly reflective of employment-led development; rather, they are more residential-led and appear to be at odds with Policy EC6 for MELs. They are also unambitious, with a low capacity of employment floorspace envisaged (1,933m2), across the site allocation. This is a fraction of the residential development envisaged here. • How will the requirements of this site allocation be reflected in the determination of live planning applications which do not appear to conform, for example the current Sun-Wharf scheme which proposes residential-led development? CA is very concerned that the redevelopment of a large portion of this site is likely to have been delivered that will not meet the aspirations of this site allocation, rendering it out of date before its adoption. • We suggest that where proposals have already been delivered or are already under consideration by planning officers which do not meet the requirements for employment-led development as set out this site allocation, there needs to be more flexibility for other owners/developers within that area to develop in line with the overarching objectives in addition to safeguards to ensure there is not undue pressure on them to meet all of the shortfalls. • How does LB Lewisham define 'positive frontage' (the draft Plan refers to both 'positive' and 'active' frontages – what is the distinction between them?). • CA is supportive of the need for 'compatible' commercial, cultural, main town centre and residential uses and the guidelines for locating tall buildings in the south west corner of the site. • CA would highlight that the guidelines should ensure studio space of all types is provided, not just 'artists' studios', to reflect and meet the need for space for all creative enterprises, including those not solely in the arts sector. This will help to ensure that the true, mixed creative identity of the area is both reflected and preserved.	Support and comments are noted. Agree with the points about co-ordination of applications. Active frontage is already mentioned in the site allocation. Agree that not just artist studios are provided. In terms of employment floorspace capacities, the Local Plan provides indicative site capacities. Optimal capacity for the site will be established at planning application stage through a design led approach.	Sun Wharf MEL site allocation amended by referring to to all types of studio space and Policy DM3 (masterplans and comprehensive development).
Fifth State and (Avison Young obo)	- 3	General LNA SA 16	**Representations to Regulation 18 Consultation on draft Lewisham Local Plan: Main Issues and Preferred Approaches dated January 2021** **Joint Representation on behalf of Laurence Cohen and Melanie Curtis (Freehold Landowners) and Fifth State Ltd (Developer of 5-9 Creekside, Deptford)**	Comments noted.	No change.

			We write on behalf of Laurence Cohen and Melanie Curtis and Fifth State (the Owners and Developer) in representation to the draft Lewisham Local Plan 'Main Issues and Preferred Approaches' document (January 2021) prepared by the London Borough of Lewisham (LBL), under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended. Having reviewed the Regulation 18 version of the draft Local Plan and the accompanying evidence base documents, and attended the online engagement event focused on the North Area (held by LBL on 15 March), this letter provides a summary of the site and background, responses to individual policies as well as further comments on the development potential of the site (Site Allocation 16 Lower Creekside Locally Significant Industrial Site). We hope that the comments on the individual policies within the draft Local Plan provided below will assist the Council during the next round of consultation on the Local Plan.		
Fifth State and (Avison Young obo)	- 3	General LNA SA 16	**Context of the Representation (5-9 Creekside)** This section summarises the site and surrounding area and outlines the emerging scheme proposals at 5-9 Creekside. ***Site and Surrounding Area*** The site comprises an existing two storey building / part warehouse and servicing yard. The buildings are currently occupied by a wholesale alcohol distributor and cash and carry (Use Class B8) and artist studios (Use Class E). The total existing floorspace is 2,460 sqm. 5-9 Creekside is bound to the east and south by Creekside Road. The northern boundary backs on to the Crossfields Estate and to the west of the site is 3 Creekside which comprises the Medina Works building which accommodates a mix of art gallery, studios and creative workspaces. The wider Deptford Creekside area is undergoing change, with nearby developments including The Fuel Tank employment space managed by Workspace, mixed-use commercial and residential developments at Kent Wharf, Sun Wharf and Faircharm Dock and the Trinity Laban Conservatoire of Music and Dance. 1 Creekside has received planning permission for an 8 storey building which will deliver 56 homes and 1,541 sqm of commercial space. In addition 2 and 3 Creekside are also going through the pre-application process and we are working collaboratively to develop the emerging proposals for all three sites. ***Emerging Development Proposals*** Fifth State are currently holding pre-application discussions with planning officers at LBL regarding the emerging proposals at 5-9 Creekside. The emerging scheme proposals seek to respond to the wider vision of the changing character of Creekside and neighbouring sites, as well as the wider Deptford area. The key principles of the emerging design include: • Demolition of existing buildings to create replacement workspace on site which is being designed to respond to local market demand for employment space such as light industrial or creative industries and create an overall increase in jobs; • Delivering an employment-led mixed-use development including the introduction of co-location of student accommodation;	The supplementary information is noted.	No change.

			• Providing high quality student accommodation and complementary facilities which are suitable with the continued employment operation of the site; • Working collaboratively with neighbouring landowners to develop a comprehensive design approach to the regeneration of the area; and Responding positively to the Deptford Creekside Conservation Area. • The above principles have been underpinned by the relevant technical and environmental assessments.		
Fifth State and (Avison Young obo)	- 3	General LNA SA 16	**Comments on Local Plan Main Issues and Preferred Approaches Document** A series of comments are provided below in respect of various sections of the Local Plan Main Issues and Preferred Approaches Document which are of relevance to the proposed redevelopment of 5-9 Creekside. Proposed policy changes or requests for amendments are underlined in the paragraphs below.	Comments noted.	No change.
Fifth State and (Avison Young obo)	- 3	General LNA SA 16	We reserve the right to make further comments in relation to the policy allocation at the next available opportunity. **Next Steps** We thank you for the opportunity to be involved in the on-going preparation of the Lewisham Local Plan and trust that our representations are helpful when preparing the next version of the Local Plan. The Owners and Developer of 5-9 Creekside are very keen to engage with LBL and wish to continue to be involved in subsequent consultations. Please do not hesitate to contact Avison Young should you wish to discuss any of the points raised above.	Comments noted.	No change.
Artworks Creekside (Avison Young obo)	- 3	General LNA SA 16	**LEWISHAM LOCAL PLAN: REGULATION 18 CONSULTATION: WRITTEN REPRESENTATIONS** **OBO Artworks Creekside** These representations are made on behalf of our client, Artworks Creekside, in relation to the Regulation 18 Local Plan Consultation: Main Issues and Preferred Approach to Proposed Changes to the Adopted Policies Map being undertaken by the London Borough of Lewisham. The consultation material comprises: • Local Plan: Main Issues and Preferred Approaches; • Proposed Changes to the Adopted Policies Map; • Integrated Impact Assessment and Non-Technical Summary; • Habitats Regulation Assessment; • Draft Infrastructure Delivery Plan; and • Relevant Evidence Base, including the Employment Land Review (2019), Site Allocations background paper (2021) and Residential Density Technical Paper (2020). Having reviewed the Regulation 18 version of the draft Local Plan and the accompanying evidence base documents, and attended the online engagement event focused on the North Area (held by LBL on 15 March), this letter provides a summary of the site and background, responses to individual policies as well as further comments on the development potential of the site (Site Allocation 16 : Lower Creekside Locally Significant Industrial Site).	Comments noted.	No change.
Artworks Creekside (Avison Young obo)	- 3	General LNA SA 16	Artworks Creekside make comment on the approach to industrial intensification within the LSIS – most particularly the inconsistent approach with the London Plan (2021), and the indicative development capacity of the draft Allocation. Further comment is also made on the draft Policy regarding Public Houses, and	Comments noted.	No change.

			how the Council will assess proposals affected designated and non designated heritage assets. We hope that the comments on the individual policies within the draft Local Plan provided below will assist the Council during the next round of consultation on the Local Plan.		
Artworks Creekside (Avison Young obo)	- 3	General LNA SA 16	**Context of the Representation** This section summarises the site and surrounding area and outlines the emerging scheme proposals at for the sites under the ownership of Artworks Creekside. The extent of these sites are shown in **Appendix I.** *LB Lewisham officer note: Appendix 1: 2 Creekside and 3 Creekside Site Plan is included in the original representation. The plan shows the two site boundaries in red.*	Comments noted.	No change.
Artworks Creekside (Avison Young obo)	- 3	General LNA SA 16	***Site and Surrounding Area*** 2 Creekside 2 Creekside is a 4 storey building, known as The Birds Nest public house and the associated land. The building has a partial basement, and this space alongside the ground floor is used as the public house (Sui Generis). At first and second floor is an ancillary hostel / HMO which is accessed through via an internal stairway from the ground floor. The third floor is occupied by a flat which benefit from an external amenity space. The building is in a poor condition and has suffered from a lack of investment having been through various ownerships in the recent past. The public house trade has suffered from changing national trends and the Birds Nest has been affected by this. The land associated with the building is currently in a mixture of commercial and employment generating uses. The Big Red is a static double-decked bus which last operated as bar and pizzeria, and which made use of external seating between the building and the DLR railway viaduct which runs to the south of the site. The eastern portion of the site is occupied by 8no. shipping containers which accommodate a range of creative business enterprises, and which provide affordable and flexible small commercial premises. 3 Creekside 3 Creekside includes a 2 storey building and associated single storey structures and is locally known as Medina Works. The building and the land associated are current used by a mixture of business as an art gallery, studio, café, creative workspaces and social space for the local community. The building benefits from large internal volumes with open floor plans and floor-to ceiling heights. The site does not include the two-storey warehouse structure topped with a double gabled roof directly to the north of 3 Creekside, and this falls within separate ownership under the postal address of 5-9 Creekside. We are working with the development team on this adjacent site in order to bring forward a masterplan led redevelopment strategy.	The supplementary information is noted.	No change.

			Emerging Development Proposals Artworks Creekside are currently holding pre-application discussions with planning officers at LBL regarding the emerging proposals at both 2 and 3 Creekside. The emerging scheme proposals seek to respond to the wider vision of the changing character of Creekside and neighbouring sites, as well as the wider Deptford area. The key principles of the emerging proposals include: • The creation of creative workspaces which align with their track record and approach to such spaces elsewhere: • The delivery of an employment-led mixed-use development that responds to the Council's emerging policy designation and which deliver significantly more jobs than the existing site: • The integration of the development into the emerging Creative Quarter that the Council has identified for Creekside, and for the wider Deptford Area: • The successful integration of the Birds Nest public house into a development, and the provision of a viable public house which can act as a community hub: • A series of commercial and employment areas which are financially sustainable: • Residential development which assists in creating a vibrant community and achieves a successful mixed use development.		
Artworks Creekside (Avison Young obo)	- 3	General LNA SA 16	We would therefore suggest that the recommendations set out in these representations should be carefully considered and incorporated into the proposed policy wording in order for the allocation policy to be found sound. We reserve the right to make further comments in relation to the policy allocation at the next available opportunity. **Next Steps** We thank you for the opportunity to be involved in the on-going preparation of the Lewisham Local Plan and trust that our representations are helpful when preparing the next version of the Local Plan. Artworks Creekside strongly consider that the viability of redevelopment proposals should be understood by the Council in further drafting of Site Allocation 16, and as such are very keen to engage with Council and wish to continue to be involved in subsequent consultations. Please do not hesitate to contact us.	Comments noted.	No change.
Fifth State and (Avison Young obo)	3	LNA SA 16	**Comments on draft Site Allocation 16 (Lower Creekside Locally Significant Industrial Site)** The following sections assess the soundness of the draft Site Allocation 16 in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF) (2019), which states that a Local Plan should be positively prepared, justified, effective and consistent with national planning policy. *LB Lewisham officer note: Appendix 1 Draft Site Allocation 16 is included in the original representation.* ***Site Allocation (Indicative Development Capacity)*** Site Allocation 16 comprises a number of development sites along Lower Creekside, including 5-9 Creekside which is bound by the road to the south and east.	Comments relating the Site Allocations Background Paper are noted. Where no advanced pre-application has taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Site Allocations Background Paper.	No change.

			The summary page identifies that the whole site allocation comprises 1.1 ha, and has an indicative capacity for 160 residential units and 8,201 sqm of employment floorspace. We note that the site allocation has reduced from the 255 residential units previously identified in the March 2020 draft Local Plan (which was not consulted on). The Site Allocation Background Paper (January 2021) which underpins the draft Local Plan identifies that the indicative capacities should not be read prescriptively and the actual development capacity of a site will need to be established through detailed design. Indicative site capacities are based on either existing planning consents, pre-application stage proposals, masterplan studies or SHLAA density assumptions (taking account of sensitivity assumptions on heritage assets for example). On LSIS co-location sites, a general assumption of 33% employment floorspace and 67% residential uses is suggested. Appendix A of the Site Allocation Background Paper outlines that for Lower Creekside LSIS the standard method (SHLAA) plus sensitivity analysis was undertaken to establish the 160 residential unit capacity. We consider that in accordance with the SHLAA density assumptions, a site within an Opportunity Area with a PTAL of 4-6 could accommodate up to 355 homes (within an Urban location). Whilst we acknowledge that there are heritage sensitivities within Lower Creekside, we consider that the indicative development capacity of 160 new homes is significantly lower than what could reasonably be delivered through the redevelopment of Lower Creekside taking a design-led approach to site optimisation. This position is evidenced through pre-application design development at 5-9 Creekside and neighbouring 2 and 3 Creekside sites which indicates that the site allocation may have a greater site capacity, taking into account heritage, townscape, environmental and technical considerations. In addition given that the development at 1 Creekside (LBL ref; DC/18/106708) was approved at a density of 350 units per hectare (with a site area of 0.1ha), the indicative development capacity of 160 residential units across the 1.1ha is significantly lower than what could reasonably be delivered through the redevelopment of Lower Creekside taking a design led approach. As such it is requested that the indicative development capacity is increased, or it is made clear that the figure provided is in no way a cap on development potential.	Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the scale of development resulting from the planning consent granted for the part of the site and current pre-application discussions as well as the need to protect the heritage setting of the site.. Based on these considerations, the capacity has remained the same. Optimal capacity for the site will be established at planning application stage through a design led approach.	
Fifth State and (Avison Young obo)	3	LNA SA 16 Para 15.88	***Site Allocation (paragraph 15.88)*** The site is allocated for comprehensive employment led redevelopment. Co-location of compatible commercial, residential and complementary uses are supported within the current drafting. Fifth State request that the proposed co-location uses also include PBSA, which is considered to be suitable in this location, subject to complying with London Plan Policy H15 and draft Local Plan Policy HO8.	Support noted. Disagree as the SHMA has identified that Lewisham has already contributed a significant amount of student bed spaces and the greatest need in the Borough is for conventional housing.	No change.
Fifth State and (Avison Young obo)	3	LNA SA 16	***Opportunities (paragraph 15.89)*** The Owners and Developer of 5-9 Creekside support the opportunities provided in draft paragraph 15.89, but also consider that reference to the site being	Support noted. Agree that referencing the Deptford Creek / Greenwich	Lower Creekside LSIS site allocation amended to refer to the Deptford Creek / Greenwich

		Para 15.89	located in the Deptford Creek / Greenwich Riverside Opportunity Area should also be acknowledged, as this is envisaged to provide new jobs and homes through the plan period.	Riverside Opportunity Area will be useful.	Riverside Opportunity Area.
Fifth State and (Avison Young obo)	3	LNA SA 16 Para 15.90	***Development requirements (paragraph 15.90)*** The Owners and Developer of 5-9 Creekside support the development requirements to not reduce industrial capacity or compromise the functional integrity of the employment location. The emerging development proposals seek to deliver new active frontages along Creekside which is also supported in this section of the allocation. We do however question the requirement that development must be delivered in accordance with a masterplan to ensure the appropriate co-location of employment and other uses across the site. We suggest that this point is altered to state that designs for individual sites should demonstrate that they have been co-ordinated with neighbours. The principle of mixed use development on the sites is already secured via the Site Allocation, and we consider the nature of the area and existing uses does not require a masterplan to be approved in order for the aspirations of the site allocation to be realised.	Support noted. Disagree, as masterplans should be used to bring forward a number of sites as part of the wider regeneration of an area. Masterplans are covered in Policy DM3 of the Local Plan.	Lower Creekside LSIS site allocation amended to refer to Policy DM3 (Masterplan and comprehensive development)
Fifth State and (Avison Young obo)	3	LNA SA 16 Para 15.91	***Development guidelines (paragraph 15.91)*** We agree that non-employment uses, including residential uses, must be sensitively integrated into the development through considering operational requirements of future employment uses. Fifth State consider the 5-9 Creekside site is suitable to accommodate new workspace including artist studios and other SME accommodation. We understand that building heights will need to be designed having regard to designated and non-designated heritage assets, including St Paul's Church, Deptford Church Street, the Crossfields Estate and the Deptford Creek Conservation Area (and as such will be assessed against the relevant heritage legislation and policies as considered in further detail earlier in this letter). We support that new developments should be designed having regard to the character and amenity of the Trinity Laban Centre, the Faircharm site, the buildings opposite the Creek in Greenwich, development at the former Tidemill School and the elevated DLR. We request that the development currently under construction at 1 Creekside (which forms part of the site allocation) is also added to the list of buildings which should be considered as part of the emerging character of the area. The development at 1 Creekside establishes a number of design principles which will inform the design approach for other sites within Site Allocation 16, including height and massing.	Comments noted. Agree that the emerging building at 1 Creekside should be taken into account as part of the emerging character of the area.	Lower Creekside LSIS site allocation amended to make reference to the emerging buildings and the changing character of the area at 1 Creekside.
Fifth State and (Avison Young obo)	3	LNA SA 16	***Summary*** The Owners and Developer of 5-9 Creekside are supportive of the draft allocation as a whole, however we request that PBSA is included within the proposed development uses. Notwithstanding this and based on our current assessment, we consider that the proposed indicative site capacity may be overly restrictive and so we question whether the allocation has been positively prepared in accordance with the requirements of the NPPF. We consider that the indicative site capacity is not supported by proportionate evidence and therefore does not seek to meet the area's objectively assessed needs. Indeed the design work that is currently being prepared by Fifth State in conjunction with other landowners and development plots adjacent to 5-9 confirms that the overall capacity of Lower Creekside has potential to be higher than proposed in the policy wording.	Disagree as the SHMA has identified that Lewisham has already contributed a significant amount of student bed spaces and the greatest need in the Borough is for conventional housing. Our response on site capacity is set out above.	No change.

			We would therefore suggest that the recommendations set out in these representations should be carefully considered and incorporated into the proposed policy wording in order for the allocation policy to be found sound.		
Artworks Creekside (Avison Young obo)	3	LNA SA 16	We note that Lower Creekside (Site Allocation 16) is incorrectly labelled as a Strategic Industrial Location in Figure 15.2. This should be amended to reflect the correct designation: Locally Significant Industrial Site.	Agree that this site is not SIL.	Local Plan Figure 15.2 amended to show site as LSIS.
Artworks Creekside (Avison Young obo)	3	LNA SA 16	**Comments on draft Site Allocation 16 (Lower Creekside Locally Significant Industrial Site)** The following sections assess the soundness of the draft Site Allocation 16 in accordance with Paragraph 35 of the NPPF which states that a Local Plan should be positively prepared, justified, effective and consistent with national planning policy. ***Site Allocation (Indicative Development Capacity)*** Site Allocation 16 comprises a number of development sites along Lower Creekside, including 2 Creekside and 3 Creekside. The sites owned by Artworks Creekside and which fall within the Allocation are included in **Appendix I**. The Council identifies that the whole site allocation comprises 1.1 ha, and has an indicative capacity for 160 residential units and 8,201 sqm of employment floorspace. We note that the site allocation has reduced from the 255 residential units previously identified in the March 2020 draft Local Plan. The Site Allocation Background Paper (January 2021) which underpins the draft Local Plan identifies that the indicative capacities should not be read prescriptively, and the actual development capacity of a site will need to be established through detailed design. Indicative site capacities are based on either existing planning consents, pre-application stage proposals, masterplan studies or SHLAA density assumptions (taking account of sensitivity assumptions on heritage assets for example). On LSIS co-location sites, a general assumption of 33% employment floorspace and 67% residential uses is suggested. For the Lower Creekside LSIS, this ratio is 33% : 0% : 20% : 47% for employment : main town centre uses : other : residential uses. This has not been reflected in the Allocation. There is a clear inconsistency and the Council has no methodology for this ratio, nor does it appear to have been tested via any viability method or consider the re-provision of the public house. Whilst Artworks Creekside supports the principles of a co-located mixture of employment and residential uses, the indicative development capacity must include prior engagement with Artworks Creekside in order to demonstrate a viable redevelopment and therefore inform a viable and reasonable indicative development capacity. Furthermore, Appendix A of the Site Allocation Background Paper outlines that for Lower Creekside LSIS the standard method (SHLAA) plus sensitivity analysis was undertaken to establish the 160 residential unit capacity. Without the sensitivity analysis, a site within an Opportunity Area with a PTAL of 4-6 could accommodate up to 355 units (within an Urban location). The Council provides no explanation or methodology on how sensitivity analysis reduces a capacity.	Where no advanced pre-application has taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Site Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the scale of development resulting from the planning consent granted for the part of the site and current pre-application discussions as well as the need to protect the heritage setting of the site. Based on these considerations, the capacity has remained the same. Optimal capacity for the site will be established at planning application stage through a design led approach.	No change.

			Given that the development at 1 Creekside (LBL ref; DC/18/106708) was approved at a density of 350 units per hectare (with a site area of 0.1ha), the indicative development capacity of 160 residential units across the 1.1ha is significantly lower than what could reasonably be delivered through the redevelopment of Lower Creekside taking a design-led approach to site optimisation that reflects the Council's earlier Policies. As such it is requested that the indicative development capacity is increased following engagement with Artworks Creekside that establishes the viable quantum of development for sites within the Allocation, or it is made clear that the figure provided is in no way a cap on development potential.		
Artworks Creekside (Avison Young obo)	3 3	LNA SA 16 Para 15.88	***Site Allocation (paragraph 15.88)*** The site is allocated for comprehensive employment led redevelopment. Co-location of compatible residential and complementary uses are supported by Artworks Creekside within the current drafting. It is requested that '*compatible commercial*' uses are clarified in the Site Allocation.	Disagree, identifying specific commercial uses could limit the development potential of the site. Current wording provides flexibility.	No change.
Artworks Creekside (Avison Young obo)	3 3	LNA SA 16 Para 15.89	***Opportunities (paragraph 15.89)*** Artworks Creekside support the opportunities provided in draft paragraph 15.89, but also consider that reference to the site being located in the Deptford Creek / Greenwich Riverside Opportunity Area should also be acknowledged, as this is envisaged to provide new jobs and homes through the plan period.	Agree.	Lower Creekside LSIS site allocation amended by referencing Deptford Creek / Greenwich Riverside Opportunity Area
Artworks Creekside (Avison Young obo)	3 3	LNA SA 16 Para 15.90	***Development requirements (paragraph 15.90)*** Artworks Creekside note the continued reference to 'no net loss of industrial capacity' and this should be removed as it no longer accords with the London Plan. The emerging development proposals seek to deliver new active frontages along Creekside which is also supported in this section of the allocation. As with the commentary to draft Policy LNA4, '*the new and improved public realm*' should not necessarily be located adjacent to Creek, whilst waterside access and amenity space should not be an explicit necessity, but as an option that should be tested via a design-led process.	Disagree, as our local evidence suggests that there is a need to retain industrial floorspace on sites that are being redeveloped... Disagree, as it is considered that public realm should be located adjacent to the Creek in order to enhance waterfront access.	No change.
Artworks Creekside (Avison Young obo)	3 3	LNA SA 16 Para 15.91	***Development guidelines (paragraph 15.91)*** We agree that non-employment uses, including residential uses, must be sensitively integrated into the development through considering operational requirements of future employment uses. Artworks Creekside will consider whether either sites are suitable to accommodate new workspace including artist studios and other SME accommodation, however we seek to retain the rights to prioritise these workspace over other viable employment uses. We understand that development will need to be consider the impacts on designated heritage assets and understand that any new developments should be designed having regard to the character and amenity of the Trinity Laban Centre, the Faircharm site, the buildings opposite the Creek in Greenwich, development at the former Tidemill School and the elevated DLR.	Comments noted. Agree that the development at 1 Creekside should be acknowledged.	Lower Creekside LSIS site allocation amended to recognise the development at 1 Creekside when considering the context of this site.

			The recently commenced development at 1 Creekside (which forms part of the site allocation) must also be considered as part of the emerging character of the area. The development at 1 Creekside establishes a number of design principles which will inform the design approach for other sites within Site Allocation 16, including density, height and massing.		
Artworks Creekside (Avison Young obo)	3	LNA SA 16	***Summary*** We are supportive of the draft allocation, however Artworks Creekside consider that the proposed indicative site capacity for residential units is significantly lower than what could be reasonable achieved across the Allocation and is unreasonable restrictive. It has not been supported by proportionate evidence and having worked with adjacent landowners, the overall residential capacity of Lower Creekside has potential to be higher than proposed in the policy wording. For those reasons, the Allocation is not justified.	Our response on site capacities is set out above.	No change.
Austringer Capital Ltd (Tetlow King Planning obo)	3 3	LEA Spatial Objectives Para 6.6	*Relates to Call for site* **East Area spatial strategy** 4.9 The provision of Green Infrastructure and open space is a central part of the emerging Local Plan's strategy for the East Area of Lewisham: • Paragraph 6.6 articulates the vision for the East area, stating that "*By 2040 the abundance of high quality parks and green spaces in the East area will make it a distinctive part of Lewisham.*" • Key Spatial Objective 8 seeks to "*Protect and enhance the linear network of open and green spaces, along with improving public access to them.*" • Key Spatial Objective 9 focuses on connectivity by active travel, seeking to "*Deliver a connected network of high quality walking and cycle routes that link open and green spaces, taking advantage of the Green Chain Walk*" and to "*Ensure these routes address existing barriers to movement, such as those caused by railways and major roads."* 4.10 The Key Diagram identifies a Strategic Green Link running north-south through the area parallel to the railway, and passing alongside the former Willow Tree Riding Establishment site.	Comments noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	3	LEA 01	*Relates to Part 3, LEA SA 03* **Part 3 – Neighbourhood and Places (Lewisham's East Area)** GHL welcomes the Council's East Area and the Lee Green District Centre place principles, particularly the emphasis on delivering development to make the best use of land, including through the focused renewal of town centre and street sites. GHL also welcomes the Council's intention to identify and allocate additional sites to meet the increased needs within the borough.	Support noted.	No change.
Austringer Capital Ltd (Tetlow King Planning obo)	3	LEA 01	*Relates to Call for site* 4.11 Policy LEA1 'East Area Place Principles' gives effect to these objectives. Part J seeks the protection and enhancement of the network of Green Infrastructure	Comments noted.	No change.

			and part K seeks better walking and cycling connections including through Green Spaces.		
GHL (Leegate) Limited (Frank Knight obo)	- 3	General LEA SA 03	**Representations to Regulation 18 Main Issues and Preferred Approaches Consultation of the Lewisham Local Plan Review.** On behalf of GHL (Leegate) Limited (hereinafter 'GHL'), Knight Frank hereby submit representations in respect of the Regulation 18 Main Issues and Preferred Approaches Consultation of the Lewisham Local Plan Review, which runs from 15th January 2021 to 11th April 2021. It is understood that the London Borough of Lewisham (hereinafter 'LBL') commenced the Local Plan Review in late 2015, with a consultation on the main issues for the Plan and since then, have carried out various engagement exercises on studies and other documents to help inform the Plan's preparation including the Lewisham Characterisation Study and Call for Sites exercise. These documents form part of the Local Plan evidence base. In addition to the Local Plan: Main Issues and Preferred Approaches Consultation, the Council are carrying out a further 'Call for Sites' exercise, to establish whether there are additional sites that are potentially available in the borough for development for housing, economic development and other uses. It is noted that GHL is not submitting any potential development sites for consideration through this process. GHL strongly supports the preparation of the Lewisham Local Plan Review and this letter provides responses to the Regulation 18 consultation.	Comments noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	- 3	General LEA SA 03	**GHL (Leegate) Limited** GHL has a major land interest within the borough through recently acquiring the Leegate Shopping Centre redevelopment site (hereinafter 'the Site'), which will be affected by those policies and allocations contained within the Lewisham Local Plan Review. The Site is currently allocated under ref. SA23 (Leegate Centre) within the LBL Site Allocations Local Plan (2013) for "*mixed use retail-led with housing, offices and hotel*". The timescales for the delivery of development on the Site is 2021-2026. An indicative housing capacity of 130 dwellings is stated. However, the principle of a greater quantum of residential has been established through a resolution to grant planning permission at the Site in 2016 (ref. DC/14/090032) and the draft emerging site allocation recognises that the current allocation is now out of date and insufficient to maximise the development potential of the Site. The Site has been the subject of on-going planning discussions for some time and the principles of regeneration and housing delivery have been supported by the LBL and the Greater London Authority (hereinafter 'GLA'). Most notably, in 2016 LBL resolved to grant full planning permission, subject to the completion of a Section 106 Agreement for a retail-led, mixed-used development (including 229no. residential units and 36no. affordable housing units) on the Site (ref. DC/14/090032).	The supplementary information is noted.	No change.

			Subsequently, a revised application for an amended retail-led mixed-use proposal, which increased the quantum of residential to 393no. units, of which 64no. were affordable, was submitted to the LPA for consideration in June 2018 (ref. DC/18/107468). This application remains live pending formal decision. Furthermore, post-submission informal discussions between St Modwen, the LPA and the Mayor of Lewisham were undertaken in 2019 regarding potential for an enhanced scheme, with a greater number of units. Since acquiring the site, GHL has reviewed existing proposals to identify opportunities to optimise development proposals for a mixed use scheme that can support an increased affordable housing offer (35%) alongside other wider benefits. GHL is currently engaged in pre-application discussions with LBL, in parallel to on-going consultations with the local community and other stakeholders, regarding the comprehensive redevelopment of the Site. It is in this context that GHL submits this representation. GHL wishes to ensure that the new Lewisham Local Plan, which will shape the future of the borough and more specifically the regeneration of the Leegate Shopping Centre and Lee Green District Centre, is robust, flexible and capable of responding to future economic and demographic change.		
GHL (Leegate) Limited (Frank Knight obo)	- 3	General LEA SA 03	**Main Issues and Preferred Approaches Consultation of the Lewisham Local Plan Review (Regulation 18)** Paragraph 35 of the NPPF (which the Local Plan will be considered against) requires that any Plan submitted to the Secretary of State for Examination must be capable of being found both legally compliant and sound. This places various duties on the Council including, but not limited to, ensuring the Plan is: • Positively prepared – seeking to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and is consistent with achieving sustainable development; • Justified – the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence; • Effective – deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and • Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework. If the Local Plan fails to accord with any of the above requirements, it is incapable of complying with the NPPF, which as a result of Section 19 of the Planning and Compulsory Purchase Act 2004, is a legal requirement.	Comments noted. Agree that the legislative changes need to be taken into account in the Local Plan.	Local plan amended to make consistent references to new use classes.
GHL (Leegate) Limited (Frank Knight obo)	- 3	General LEA SA 03	It is acknowledged that a number of legislative changes were introduced by the Government during August and September 2020. This includes significant changes to the Use Class Order, which allows greater flexibility to change uses within town and district centres through three new broad use classes. We understand that the Council have not specified how these legislative changes will be addressed and how they will inform future stages of the Local Plan Review. As such, we believe further consideration is required, explaining the implications of the legislation changes to the proposed policies and site allocations contained within the Lewisham Local Plan Review.	Agree that the Local Plan should align with the Use Classes that were updated in September 2020.	Local plan amended to make consistent references to new use classes.

GHL (Leegate) Limited (Frank Knight obo)	- 3	General LEA SA 03	Overall, GHL supports the preparation of the Local Plan Review, and this representation sets out a number of observations and recommendations intended to ensure it is capable of delivering the Council's vision for the future regeneration of the Leegate Shopping Centre and Lee Green District Centre, in a rapidly changing economic climate.	Comments noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	- 3	General LEA SA 03	**Conclusion** The objectives and aspirations set out in the Lewisham Local Plan Review document form a sound basis to work from in the preparation of a new Local Plan. We therefore welcome the opportunity to make these representations at this early stage and look forward to working with the Council to progress the draft Plan, whilst also supporting the Council's vision for the comprehensive regeneration of the Leegate Shopping Centre. Should you have any queries or require further information at this stage, please contact us.	Comments noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	3	LEA SA 03	Site Allocation 3 - Leegate Shopping Centre GHL strongly supports the continued allocation of the Leegate Shopping Centre for comprehensive mixed-use redevelopment of the existing shopping centre, comprising compatible main town centre, commercial, community and residential uses. Indeed, the redevelopment of the previously developed site will perform a key role in regenerating this district centre whilst also meeting housing needs within the borough and ease pressure on unallocated sites. GHL supports the allocation within the Lewisham Local Plan Review, where an indicative development capacity of 450 residential units, 805sqm of employment floorspace and 5,449sqm of main town centre floorspace is identified. The NPPF Paragraph 117 promotes the effective and efficient use of land in meeting the need for new homes and other strategic uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. NPPF Paragraph 118 identifies that decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and that decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. Given the Site's District Centre location, it is considered that this Site should be considered for high density residential development, optimising the number of homes delivered in the urban area, in the most sustainable location. The Site and other site allocations in the area, can play a key role in achieving ambitious housing growth during the Plan period. Therefore, it is contended that the Council's proposed indicative development capacity and aspirations on unit numbers, could potentially significantly underestimate the role that the Site could perform in meeting a variety of needs. We feel that there shouldn't be an identified cap on unit numbers, other than recognition of high-density development delivered through high-quality design. Alternatively, we seek clarification on the Council's aspiration and require a justification as to how the proposed development capacity has been set. It is	Support and comments noted. . Where pre-application discussions are likely to evolve, the council has used a previous application to determine indicative site capacities – more details can be found in the Site Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the scale of development considered suitable for the site, based on a previous application and the need to deliver non-residential floorspace appropriate to the District town centre. Based on these considerations, the capacity has remained the same. Optimal capacity for the site will be established at planning application stage through a design led approach.	No change.

			GHL's understanding that no technical feasibility studies have yet been undertaken by the Council to determine these indicative capacity figures. GHL supports the Government's aspiration for the effective and efficient use of highly sustainable previously developed sites and the role that increased densification of urban sites will perform in protecting settlements beyond the boundary. Indeed, as set out within the NPPF the Council should seek to achieve densities that take account of a range of factors. GHL encourages the Council to allow for greater densities within urban areas where appropriate, including within Lee Green District Centre. The quantum of uses should be defined through a design-led process, in collaboration with the LPA and GLA and should ultimately seek to effectively reuse and optimise previously developed land, and assist with the continued improvement, enhanced sustainability and long-term viability of the Lee Green District Centre. The precise number of units, mix of units type, size and affordability is therefore to be determined as part of a design-led exercise. This approach would be consistent with the London Plan Policy D3 (Optimising site capacity through the design-led approach) that requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. GHL is seeking to deliver increased residential units, which would make a significant contribution to the Council's housing and affordable housing targets and will also help to work towards achieving the national objective to provide 300,000 net housing additions each year in England.		
GHL (Leegate) Limited (Frank Knight obo)	3	LEA SA 03	Furthermore, the quantum of employment floorspace and main town centre floorspace needs to be reviewed in light of changes to shopping and potential future of the high street, in response to a post-COVID-19 world, resulting in Government's update to the Use Class Order, whilst ensuring the quantum of floorspace is provided to continue support of the vitality and viability of Lee Green District Centre. GHL assume that the identified quantum of employment and main town centre floorspace has been calculated by the in situ floorspace. However, clarification is sought by GHL as to what evidence the Council have used to inform the site allocation and whether assessment works been carried out to justify that such provisions are sustainable going forward. Furthermore, in light of the current challenges confronting the retail sector nationally, and within Lee Green District Centre more specifically, GHL strongly encourage the site allocation policy to allow sufficient flexibility to ensure that the wider centre area is attractive to potential retailers / occupiers, and do not result in empty and unlettable units. Indeed, it is concluded that the Lewisham Local Plan site allocation policy, must plan positively for those significant opportunities to ensure the vitality and viability of Lee Green District Centre is sustainable into the future.	Comments noted. Our response to site capacities is set out above. Agree that consideration should be given to changing town centres and retail in a post pandemic world.	Local Plan amended to reflect the impact of the pandemic on town centres.
GHL (Leegate) Limited (Frank Knight obo)	3	LEA SA 03	It is therefore requested that the proposed site allocation is reviewed in the context of the latest proposals presented by GHL. In addition, we respectfully request that the site allocation is structured in a way that seeks the optimisation of site capacity through a design-led approach and that the housing target is	Development proposals must make best use of land and establish optimal capacities rather than	No change.

			expressed as a minimum to be achieved on site and also ensures that the quantum of employment and main town centre floorspace is appropriate and informed by evidence of need.	explicitly supporting higher density development. Recognition that site capacities are indicative and that optimal capacity for the site will be established at planning application stage through a design led approach is already included at the start of Part 3 of the Local Plan	
GHL (Leegate) Limited (Frank Knight obo)	3	LEA SA 03	GHL support the Council's aspirations set out in the 'development requirements' and 'development guidelines' supporting paragraphs. Nevertheless, GHL re-emphasise that the proposed designation of the Primary Shopping Area is key and needs to be carefully drawn, to ensure that there is no conflict with the aspirations set in the proposed site allocation.	Support noted. Agree that the primary shopping area boundary should be amended.	Local Plan amended with a revised primary shopping area.
GHL (Leegate) Limited (Frank Knight obo)	3	LEA SA 03	The proposed timeframe for delivery of any redevelopment is between 2020/21 to 2024/25. Subject to pre-planning discussions, GHL are confident that the development can commence in this timeframe with potential scope to be completed as well.	Comments noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	3	LEA SA 03	In light of the above, we would welcome an opportunity to review the proposed site allocation for the Leegate Shopping Centre with the Council as part of the Lewisham Local Plan Review, and in consideration of the emerging proposals at the site.	Comments noted.	No change.
Austringer Capital Ltd (Tetlow King Planning obo)	3 3	LEA 04 LEA 05	*Relates to Call for site* Policies LEA4 'Linear Network of Green Infrastructure' and LEA5 'East Lewisham Links' offer further detailed policy guidance on how these objectives might be achieved. 4.12 Policies LEA4 and LEA5 clearly contemplate development coming forward that supports these broad aims. For example, part A of policy LEA4 requires that "*Development proposals should respond positively to the linear network of green infrastructure as a vital environmental asset within the Borough and defining feature of the Blackheath, Lee and Grove Park neighbourhoods*". Part B sets out a series of criteria that developments should meet, and part C emphasises the role of effective management. 4.13 In this context, policies LEA4 and LEA5 rightly recognise the role of development and the benefits that it can deliver for the wider network of Green Infrastructure and active mode connectivity. This is a pragmatic approach that could secure meaningful improvements in respect of both issues. Yet other policies, particularly GI2 and its 'no net loss' requirement for open space, are more restrictive in their approach. 4.14 Overall, we consider the vision for the East Area is a positive one and is supported. It provides a policy framework that supports deliverable improvements to open space, Green Infrastructure and active travel links. In this	Specific redevelopment proposals to enable improvements to open spaces and help to achieve the vision for the East sub area will be considered on a site by site basis.	No change.

			context, we recommend that the Council gives careful consideration to the role that the Former Willow Tree Riding Establishment can play in achieving these objectives. A restrictive approach risks the continued degradation of the site with no clear opportunities to secure its effective management and maintenance. However, with a site allocation and careful consideration of the opportunities for open space and environmental enhancement, a meaningful improvement in the open space and connectivity of the site can be achieved.		
Transport for London Commercial Development	3	LEA SA 09	Lewisham's East Area: Site Allocation **9 - Sainsbury Local and West of Grove Park Station** Given TfL's existing bus operations at Grove Park Bus Stand, TfL CD note the text in the development guidelines section which states that "*The bus garage is in operational use. Applicants should consult with Transport for London to investigate future options for the garage, including its continued use, which the site masterplan should address*". The part of the site owned by TfL is used as a bus stand and not a bus garage. TfL CD would be open to discussing potential for development which includes this site; this would need to safeguard TfL's operational function either as existing or as part of redevelopment of an accessible brownfield site, subject to meeting operational needs. *LB Lewisham officer note: a map showing TFL's landholdings in the vicinity of the Grove Park station site is included in the original representation.*	Agree.	Sainsbury Local and West of Grove Park Station site allocation amended by referencing a bus stand instead of a bus garage and continued operational function of the bus stand.
Stoken Properties Ltd (Boyer obo)	3	LSA Vision	*Relates to Call for site* *Lewisham's South Area* We are pleased to see that the Council has identified South Lewisham as a key area for regeneration and in particular are supportive of paragraph 17.7 which confirms that the *"regeneration of brownfield sites in Bell Green and Lower Sydenham will deliver a significant amount of new housing, including a high proportion of genuinely affordable housing, workspace and jobs, community facilities and open space. A new mixed-use neighbourhood will be created through the redevelopment of out-of-centre retail buildings, the former gasholders, industrial land around Stanton Way and other sites."* It is encouraging and welcomed to see the Council realise the significant opportunity that the regeneration of brownfield sites in Bell Green and Lower Sydenham have in delivering high-quality, mixed-use neighbourhoods. A primary aim of planning policy is for development proposals to make the best and most efficient use of land. It is therefore welcomed and supported to see that the Council require development proposals to optimise the use of land and capacity of sites. In general we are supportive of the Council's aim and vision for Lewisham's South Area and provide comment on specific policies below.	Support and comments noted.	No change.
Stoken Properties Ltd (Boyer obo)	3	LSA Vision	*Relates to Call for site* Overall, we are supportive of the Council's vision and ambitions for Lewisham's South Area and the fact that they acknowledge the important role it will play in helping to deliver more inclusive and liveable neighbourhoods in the Borough.	Support noted. Comments relating to stakeholder engagement in the masterplan are noted.	No change.

			Whilst Lewisham's South Area, and in particular Bell Green and Lower Sydenham, do have the potential to deliver a significant amount of growth over the plan period, it is encouraging to see that the Council understand that development may have to be phased and it may be the case that parts of some sites come forward in the first instance, which will facilitate the development of the wider site. Whilst we hope for clarity on the points raised above, we are generally in favour of the Council's proposals and in particular the fact that the Council acknowledge that the Bell Green and Lower Sydenham area presents an excellent opportunity for the comprehensive redevelopment and regeneration of sites to deliver new high quality, mixed-use development. It is understood that the Council will be working with interested parties to prepare a masterplan for the regeneration of the Bell Green and Lower Sydenham area. As our client has an established interest in the area, owning part of the site identified as Stanton Square, we would be very interested in being involved in any future discussions concerning the masterplan and look forward to receiving details on how to become involved in this process in due course.		
Tetra Tech Planning (John Lyon's Charity obo)	3	LSA Vision	**Part Three – Lewisham's Neighbourhoods: Chapter 17 - Lewisham's South Area** We respond to each of the questions in turn: **How do you feel about the proposed vision for the (South) area?** The Charity commends the Council for its bold and ambitious vision for the South Area, which provides a clear and detailed synopsis of how the Council envisage the area in 2040. **Do you have any comments on the proposed vision?** The Vision for any new Local Plan should be aspirational but also realistic. The proposed vision sets out an aspirational and positive approach to the regeneration and growth of the South area over the Local Plan period. We note that the Bakerloo Line extension is referred to in the Vision. Notwithstanding the Secretary of State's safeguarding directions for the Bakerloo line in March 2021, the safeguarding directions only pertain to the first stage of the Bakerloo Line – from Elephant & Castle via Old Kent Road and New Cross Gate to Lewisham. TfL's consultation on the Bakerloo Line extension in December 2019 sought "views" on potentially extending the line beyond Lewisham – to Hayes and Beckenham Junction, which could include a new station at Lower Sydenham; we would therefore reiterate that there is a need for pragmatism when discussing the Bakerloo Line, specifically Phase 2 and the development potential that it could offer to the South of the borough. The Vision refers to "a new mixed-use neighbourhood", which will be created through "the redevelopment of out-of-centre retail buildings, the former gasholders, industrial land around Stanton Way and other sites" . The Bell Green Retail Park, and Trade City, and its associated surface car parking is a highly successful and popular destination in south-east London. The Vision correctly recognises the need for a Masterplan to guide these development proposals in	Support and comments noted. Agree that there is a need to be pragmatic when referring to BLE and its development potential in south of the Borough	Local Plan amended to recognise that the BLE safeguarding direction relates only to the first stage of the Bakerloo Line – from Elephant & Castle via Old Kent Road and New Cross Gate to Lewisham and that Phase 2 in the south of the Borough should be considered pragmatic manner.

			and around Bell Green and it is critical that this process starts in earnest as soon as possible with engagement from key stakeholders, including landowners, business owners and the local community. The Charity welcomes the creation of new homes, including genuinely affordable housing, the creation of new employment space and jobs, community facilities and green spaces, all of which are central to the success of mixed-use neighbourhoods.		
Tetra Tech Planning (John Lyon's Charity obo)	3	LSA Key Spatial Objectives	**Do you have any comments on the proposed key objectives?** The 12 key objectives reflect the vision in a clear and robust manner, and they set out how the Local Authority will deal with the key issues. The Charity does however reiterate its comments made in relation to the BLE and the need for a high degree of pragmatism when discussing the objective to "secure the delivery the Bakerloo line extension". The South Area falls within a potential Phase 2 of the BLE, which may not come forward during the Plan period, indeed, it may not come forward at all, however the overall designation as a "Strategic Area for Regeneration" alongside the local "Regeneration and Growth Nodes" should support and encourage transformative growth in the area regardless of Phase 2. The Charity welcomes and fully supports those tangible objectives which seek to "coordinate new investment in the Bell Green and Lower Sydenham area to enable it to become a London Plan Opportunity Area" ; and "deliver the regeneration of the former gasholders, Bell Green Retail Park and other sites nearby to create a new high quality residential-led mixed-use area that is well integrated with existing neighbourhoods and communities". The future designation of an Opportunity Area within the London Plan is for the Mayor of London and the GLA, however the Charity does welcome and support the Council's objective of coordinating new investment in the Bell Green and Lower Sydenham area to "enable" that to happen and would expect the highest levels of public engagement, with effective participation from key stakeholders, from the outset of the process.	The support for an Opportunity Area at Bell Green/Lower Sydenham is noted and agree that public engagement will be a necessary part of this process. The Council is a strong advocate of the BLE and the benefits that this will bring to Lewisham residents. However the planned growth within the Local Plan is not predicated on the delivery of the BLE.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	3 3 3	LSA SA 01 LSA SA 03 LSA SA 04	Site Allocations 1 (Former Bell Green Gas Holders), 3 (Bell Green Sainsbury's) and 4 (Stanton Square) are adjacent to or within close proximity to Site Allocation 2 and this "Regeneration Node" will require an effective strategy to co-ordinate the significant regeneration in an effective manner.	Agree that the four site allocations will need effective co-ordination. All four site allocations already mention "that development must be delivered in accordance with an area framework/masterplan for Bell Green and Lower Sydenham.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	- 3	General LSA	**Conclusions** Overall, the Charity, as a key stakeholder in the South Area, is supportive of the aims and objectives of the Regulation 18 Local Plan. Plans should be prepared positively, in a way that is aspirational but deliverable. The Charity welcomes and supports the borough's aspirational Local Plan, while recognising the pragmatism	Support noted.	No change.

			needed in relation to the Bakerloo Line Extension. In accordance with the NPPF (paragraph 16c), the Charity endorses early and effective engagement with the Council to progress and shape the Plan prior to its Regulation 19 consultation.		
Phoenix Community Housing (BPTW obo)	- 3	General LSA	I am writing on behalf of our client Phoenix Community Housing (PCH) to provide comments in response to the second Regulation 18 stage consultation document *('Main Issues and Preferred Approaches')* for the emerging Local Plan 2020-2040. These comments follow our previous representations on behalf of PCH submitted at the first Regulation 18 stage consultation, back in November 2015. **Introduction** PCH are a not-for-profit, residential-led housing association who own and manage more than 6,000 homes in Lewisham. Their primary areas of operation are Bellingham, Whitefoot and Downham, all within the south Lewisham area. PCH therefore represent a key stakeholder within this part of the borough and have a keen interest in the emerging documentation relation to the draft Local Plan which will have a major impact on the future operations of the association. Having reviewed the documentation, we would like to make comments	Comments noted.	No change.
Phoenix Community Housing (BPTW obo)	- 3	General LSA	**General Strategy** The consolidation of LBL's Core Strategy and various development plan documents into a single plan is welcomed. The delay since the previous Regulation 18 consultation in 2015 has been useful in enabling the Tier 1 New London Plan process to be completed ahead of advancing LBL's Tier 2 plan, noting that Lewisham's contribution to housing has been upped. This also enables the new Lewisham plan to respond to the contemporary matters of the climate crisis declared by the borough, the potentially permanent implications on patterns of living brought about by coronavirus, and to be consistent with the updated NPPF (2019), which placed a greater emphasis on making efficient use of land through sensitive intensification, brownfield sites and small sites. It is less fortunate, however, that since this consultation began TfL have put an indefinite hold on the Bakerloo line extension, casting doubt upon the deliverability of a fulcrum of all the spatial strategy options presented (and indeed the preferred approach) within the plan period. The extension is not cancelled, though, with Grant Shapps issuing safeguarding directions on the land proposed to be used for Stage 1 to Lewisham in order to ensure no other use of land will be permitted within the likely corridor. Making strategic allocations in this plan around future Bakerloo line stations could see major scale growth arrive before the required infrastructure. A more justifiable and effective strategy for this plan would be to focus strategic development around the short-medium term A21 Healthy Streets Corridor ('Lewisham Spine') initiative, existing public transport networks, and promoting to a greater extent sensitive intensification and regeneration in the more deprived areas of the borough. Deprivation in the south of the borough is being exacerbated by the pandemic as noted below and the Bakerloo Line extension would have assisted with regeneration and better employment options for the PCH community. Both need to recognised and addressed in planning.	Comments noted. The planned growth within the Local Plan is not predicated solely on the delivery of the BLE and the A21 Healthy Streets Corridor and sensitive intensification form an important element of the spatial objectives for Lewisham's south area. The vision also seeks to deliver improvements that address the causes of deprivation in the Borough's south.	No change.
Phoenix Community Housing (BPTW obo)	- 3	General LSA	I trust that the above comments will be taken into account as part of the continuing development of the Local Plan and would of course welcome any further engagement on the issues that have been discussed. Should you require any further clarification on the issues discussed in this letter, please do not hesitate to contact me	Comments noted.	No change.
Southern Gas Networks (Carter Jonas obo)	- 3	General LSA SA 01	**LEWISHAM LOCAL PLAN TO 2040 – MAIN ISSUES AND PREFERRED APPROACH REGULATION 18 CONSULTATION – SOUTHERN GAS NETWORKS REPRESENTATIONS** On behalf of our client, Southern Gas Networks (SGN), we enclose representations to the London Borough of Lewisham's ('the Council') "Main	Comments noted.	No change.

			Issues and Preferred Approach" consultation on its emerging Local Plan to 2040. Our client is the sole, freehold owner of the Former Bell Green Gas Holders, Bell Green, SE26 4PX (hereafter known as 'the Site'). The Site is included as a draft allocation in the emerging Local Plan ('1: Former Bell Green Gas Holders) (details provided on Page 698-699). The Council have indicated that the Site has an indicative development capacity of 73-178 net residential units, alongside employment uses (782sqm) and main town centre uses (1,563sqm), with a timescale for delivery within the first 5 years of the plan (2020/21– 2024/25). Should you have any queries, please do not hesitate to contact Cater Jonas.		
SGN (Quod obo)	- 3	General LSA SA 01	**Sydenham Gas Works** **London Borough of Lewisham: Regulation 18 Stage Local Plan "Main Issues and Preferred Approaches** **Representations on behalf of SGN** Please find enclosed representations submitted on behalf of SGN. We would be grateful for confirmation of receipt of these representations. Please do not hesitate to contact me with any queries you may have in relation to the enclosed.	Comments noted.	No change.
SGN (Quod obo)	- 3	General LSA SA 01	**1 Introduction** 1.1 Quod is instructed by Scotia Gas Network (SGN) to submit representations to Lewisham Council in respect of its Regulation 18 – Local Plan "Main Issues and Preferred Approaches". These representations are submitted within the consultation period of 15th January to 11th April 2021. 1.2 SGN supports the Council's ambition for growth and renewal across the borough and particularly towards the Bell Green / Lower Sydenham area. SGN is the owner of the 'Former Bell Green Gas Holders' (the "gas works site") – Site Allocation 1, and to which these representations are principally focussed towards. **The Site** 1.3 SGN is the current owners of the 0.77-hectare gas works site allocated for redevelopment within the Regulation 18 draft Local Plan. The site previously contained two gas holder structures that were removed in 2019 following the grant of prior approval for their removal under application DC/18/107607, which was determined in July 2018. 1.4 SGN has previously engaged with Lewisham Council in promotion of the site for redevelopment as part of the adopted Local Plan – Site Allocations (2013), which identified the gas works site as part of wider Site Allocation SA26 (2013 Site Allocation Local Plan) for the Former Bell Green Gasworks (Phases II & III), Sydenham, SE26, which extends across 9.7 hectares. 1.5 The existing SA26 allocation comprises Phase 2: Mixed use business, industrial or warehouse, non-food retail units and associated garden centre, restaurant and retention of Livesey Memorial Hall as a social club; and Phase 3: Mixed use residential and retail. The site is adjacent to the Sainsbury's supermarket at Bell Green, which was developed as Phase 1.	The supplementary information is noted.	No change.

			1.6 In support of the adopted Local Plan's ambition, the existing site allocation SA26 has been the subject of large levels of development with Phase 2 and Phase 3 of the allocation built out to deliver the Bell Green Retail Park (DC/11/78646) and Pear Tree Court (DC/09/72403). At the time of the Local Plan adoption in 2013, the Gasworks were considered to be operational gas holders, to which the Health and Safety Executive PADHI guidance applied and therefore restricted the site's redevelopment as part of the adjacent Phase 2 and Phase 3 developments. 1.7 The gas works continues to be the subject of a Hazardous Substance Consent. SGN will ensure that this is revoked prior to the site coming forward for development. 1.8 In view of its undeveloped status, the redevelopment of the gas works site continues to be promoted through the Regulation 18 Local Plan under Site Allocation 1, for a comprehensive mixed-use development with an indicative capacity of up to 178 homes, and up to 1,563sqm of non-residential floorspace. SGN remains supportive of the redevelopment ambition for the gas works site albeit believes that the current indicative capacity fails to optimise the residential capacity of this site in line with the adopted London Plan and wish to engage with Lewisham Council as part of the emerging Local Plan to address this. 1.9 SGN worked with the Mayor of London to inform the policies of the adopted London Plan. Policy H1 allocates gasworks sites as a strategic source of housing, and footnote 59 specifically recognises the challenges of bringing forward these sites for development.		
SGN (Quod obo)	- 3	General LSA SA 01	**2 Gasworks Policy - Conformity with National Planning Policy Framework and the London Plan** 2.1 SGN welcomes the opportunity to contribute to the emerging Regulation 18 Local Plan, which shall guide development across Lewisham. The Sydenham Gas Holder site represents a key development site within the wider Lewisham South area. 2.2 Within this section, we identify national policy and London Plan policies that specifically relate to the redevelopment of gas works sites and which will need to be taken into account by Lewisham Council in formulating their site-specific allocation to ensure a sound approach. 2.3 National Policy1 stipulates that plans and decisions should apply a presumption in favour of sustainable development. 2.4 For plan-making this means that plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. 2.5 Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. 2.6 Plans are *'sound'* if they are:	The supplementary information is noted.	No change.

			a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. **b) Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. **c) Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and **d) Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework. 2.7 These tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area. 2.8 To meet the tests of soundness, the Regulation 18 Local Plan must remain in conformity with the London Plan and National Planning Policy. Below, we provide a detailed explanatory note of policy relevant to gasworks sites. **National Planning Policy Framework** 2.9 The National Planning Policy Framework 2019 ("NPPF") sets out the Government's planning policies for England and how these are expected to be applied. It is an important material consideration when considering how to formulate and apply planning policy to planning decisions. 2.10 The NPPF contains national policy on a range of topic areas including decision making, viability, affordable housing, design, open space, heritage, and the economy. The *"presumption in favour of sustainable development"* remains the central tenet of the NPPF. 2.11 Significantly, the NPPF refers specifically to the need to deliver more homes, at a greater density, on brownfield land, especially on land that is contaminated. 2.12 This is, in part, a reflection of the work that gas works companies have undertaken with Government to create a policy framework which supports and promotes the delivery of heavily contaminated sites for homes. This is important due to the *'Do Nothing'* scenario which is a real consideration whereby the revenue generated by development is not sufficient to offset the abnormal costs. In such cases, the gas works site will remain in situ and underdeveloped, as has been evidenced across much of the UK. 2.13 The Government's objective of "*significantly boosting the supply of homes*" is a clear national policy objective as set out in the first paragraph of Chapter 5 of the NPPF, *'Delivering a Sufficient Supply of Homes'*. 2.14 National policy requires strategic policy-making authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability,		

			suitability and likely economic viability. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. 2.15 Chapter 11 of the NPPF sets out policies for '*Making Effective Use of Land*'. Planning policies and decisions should promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or brownfield land. 2.16 National policy sets out the Government's approach to brownfield contaminated land, giving "*substantial weight"* to its redevelopment and remediation at Paragraph 118 Part (c), which is set out below:- *"(c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land"* 2.17 It also promotes and supports the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing, where land supply is constrained, and available sites could be used more effectively. 2.18 Chapter 11 considers the objective of achieving appropriate housing densities. The Government expects planning policies and decisions to support development that makes efficient use of land, taking into account viability. At Paragraph 123, national policy expects the optimal use of a site for housing. *"Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site".* 2.19 National planning policy promotes the redevelopment of gas works site for housing, at optimal densities affording substantial weight to the value of using suitable brownfield land for homes.		
SGN (Quod obo)	- 3	General LSA SA 01	**London Plan** 2.20 The recently adopted London Plan (2021) carries significant weight due to its conformity with the NPPF and recent testing at the examination in public. Importantly specific consideration has been applied to gas works sites, and they are referenced throughout the Plan. The reason for this is that gas utility companies (including SGN) were able to work with the GLA to examine the evidence base behind the challenges of delivering gas works sites. The background evidence base, as well as the determination of live planning applications considered by the GLA has helped to inform these policies, which have been subject to extensive and detailed consultation, review and examination in public. They have been found sound and are now formally adopted.	The supplementary information is noted.	No change.

			2.21 Three principal issues informed the policy debate. We consider these below and in assessing these factors conclude that the development of gas works sites can be treated as an exceptional form of development within London. **Are gas works sites subject to abnormal costs?** 2.22 The evidence base to the London Plan (2021) recognises that remediation costs of gas works sites are significant. The London Industrial Land Demand Study 2017 explicitly recognises the limitation of land contamination at gas works sites, its cost, and the requirement to incentivise development through higher land values. It confirms the following: *"Land contamination can constrain the future of such land (e.g. for former gas holder sites): decontamination works are costly and can require the incentive of higher land values (e.g. from residential developments)".* 2.23 The abnormal costs will be experienced at the very start of the project, which can also result in long lead in times as the environmental planning considerations are addressed (remediation, water sampling etc). 2.24 Decontamination costs were considered at the Tower Hamlets Local Plan 2031 Examination in Public (September 2018). The Council's evidence base to the examination included the Tower Hamlets Local Plan Viability Assessment 2018 Paragraph 7.17. This considered three Gasholder sites within its borough concluding that *"we have included an allowance of £3.2m/ha for the sites, based on our experience of the costs associated with decontamination of similar Gas Works sites in London"*. This is a conservative figure as it relates only to decontamination costs rather than other costs such as the need to relocate gas infrastructure on site to facilitate redevelopment; rationalise high pressure gas mains; the erection of new Pressure Reduction Stations; and the removal of gasholder structures on site. However, it remains a significant cost. 2.25 Notwithstanding this, Tower Hamlet's own viability evidence found that the three gas works sites could not deliver policy compliant levels of affordable housing (an average maximum reasonable affordable housing provision of 20% was evidenced across the three sites). To ensure deliverability for the purposes of the Local Plan Tower Hamlets found it necessary to identify lower levels of affordable housing (flexible tenure mix) or ensure policy flexibility through increased density and a flexible approach to housing mix to achieve a policy compliant level of affordable housing. **Can gas works sites contribute strategically to the delivery of housing in the capital. If they can, should they be subject to affordable housing thresholds and review mechanisms which apply to industrial sites that are brought forward for housing?** 2.26 The London Plan categorises gas works sites as surplus utility sites, and these sites are identified as a strategic source of housing. 2.27 Policy H1 '*Increasing housing supply'* is the principal housing delivery policy of the London Plan (2021) and its purpose, as the policy name suggests is to increase housing supply across London. Part B(2) states that Boroughs should *"optimise the potential for housing delivery on all suitable and available*		

			brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity…". 2.28 The policy lists six strategic sources of housing capacity. Sub paragraph (d) is relevant to gas works sites and identifies them for redevelopment as a strategic source of housing: *"d) the redevelopment of surplus utilities and public sector owned sites."* 2.29 Surplus utilities are distinguished from other categories of sites. For example, industrial sites planned for release under Policies E4, E5, E6 and E7 are a separate sub-category at Policy H1(b)(2)(f). 2.30 Utilities sites are also considered in the Strategic Housing Land Availability Assessment 2017 (SHLAA) which forms part of the evidence base for the adopted London Plan (2021). The SHLAA confirms that *"surplus utilities sites"* have been retained within the 10-year housing target where they have been promoted for redevelopment unlike designated industrial sites. 2.31 To incentivise and de-risk the delivery of surplus utilities sites, the London Plan (2021) exempts gas works sites from the London-wide affordable housing requirement (50%) applied to other industrial sites by Policy H4. Instead, it recognises that gas works sites will have a lower affordable threshold and exempts them from late-stage reviews, where challenges to delivery are evidenced. 2.32 Footnote 59 of the new London Plan specifically sets out what tests surplus utility sites should undertake to demonstrate the challenges of delivery. Footnote 59 recognises the substantial costs of preparing surplus utilities sites for development. It therefore (inter alia) confirms that surplus utility sites can be subject to the 35% affordable housing fast track approach, conditional upon evidence being provided of extraordinary costs. *"It is recognised that some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35 percent affordable housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available".* 2.33 Gasworks sites are therefore capable of having a 35% threshold level of affordable housing applied and follow the Fastrack Route. The Mayor requires the demonstration of decontamination requirements, and that enabling, or remediation costs must be incurred to bring surplus utility sites forward for development. 2.34 In accordance with the approach taken across London to date, evidence will be submitted to demonstrate substantial decontamination, enabling and remediation costs during the pre-application process. **Can gas works sites viably contribute towards London's industrial floorspace capacity?**		

			2.35 The challenges of delivery of gas works sites are reflected in the economic policies of the London Plan. 2.36 Supporting text to Policy E4 (Land for Industry, Logistics and Services to Support London's Economic Function) previously confirmed that the principle of no net loss of industrial floorspace capacity does not apply to sites previously used for utilities infrastructure which are no longer required e.g., surplus utility sites, because of their delivery challenges. *"The principle of no net loss of floorspace capacity does not apply to sites used for utilities infrastructure or land for transport functions which are no longer required".* 2.37 As a result of the Secretary of State's decision to direct the Mayor to remove Policy E4(C) which sought, in overall terms across London, no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS, the supporting text to this policy has also been deleted (former paragraph 6.46-6.4.11). 2.38 Paragraph 6.4.8 was also removed due to the blanket approach. The London Plan objective that gas works should not provide industrial capacity was however a principle tested at through the local plan review and remains an accepted policy principle. **Summary** 2.39 The London Plan allocates gas works sites as a strategic sources of housing supply. The London SHLAA relies upon such sites for its 10-year housing target. Gas works sites are considered separately from industrial sites. The challenges of delivery result in their exceptional consideration within the Plan. They are expected to deliver a lower threshold of affordable housing, exempt from a late-stage review mechanism, and the economic policies of the Plan recognise that gas works should not provide industrial floorspace. 2.40 SGN would welcome working with the Council to ensure that the Reg 18 Local Plan reflects these specific policy requirements - in particular, London Plan Policies H1 and E4, and Footnote 59 of the London Plan should be explicitly referenced.		
SGN (Quod obo)	- 3	General LSA SA 01	**5 Lewisham Local Plan – Regulation 18 – Other Planning Policies** 5.1 The following section considers the draft policies of the Regulation 18 Local Plan and its supplementary text. It is requested that the following commentary is read collectively. 5.2 Our commentary is tailored to the policies that we consider as directly relevant to Site Allocation 1 - Former Bell Green Gas Holders, and its future redevelopment. It should not therefore be assumed that where our representations are silent on certain policies that SGN are supportive. 5.3 Quod on behalf of SGN, therefore reserve the right to make further comments on any draft policies not commented upon as part of these representation, either as a supplementary submission or as part of any future consultation of the Lewisham Local Plan.	Comments noted.	No change.

SGN (Quod obo)	3	LSA SA 01	**6 Conclusion** 6.1 In conclusion, SGN are encouraged by the emerging policies of the Regulation 18 Local Plan and welcome the continued allocation of the Sydenham Gas Works site for a mixed-use development as part of the wider regeneration of South Lewisham. 6.2 SGN remain concerned that the indicative capacities of the site allocation underutilise the site and not reflect its development potential, and the development necessary to bring this site forward for housing. This is contrary to the London Plan, which identified surplus utilities sites as *'strategic sources of housing'*. The site should be optimised to deliver up to 300 new homes. The current under-optimisation also undermines the strategic regeneration objectives of the Local Plan in promoting the Bell Green/Lower Sydenham Opportunity Area. 6.3 To bring forward the site for redevelopment in accordance with the site allocation, suitable allowance for the significant decontamination costs associated with redeveloping gas work sites should be included. 6.4 SGN are supportive of Lewisham's policy objective to deliver 35% affordable housing for all major development, however, to achieve this level, the gas works site should be allocated as an appropriate location for tall buildings. The justification for tall buildings is partly driven by viability but is further supported by: 1) the strategic ambition to promote Bell Green and Lower Sydenham as a new Opportunity Area, which the London Plan supports as an appropriate local for higher density development to optimise development capacities; 2) identification of adjacent site allocations as being appropriate for tall buildings, and 3) acknowledgement that the former gas holder structures which previously rose to a height of 35m in height acted as local landmarks for the area. 6.5 SGN would welcome the opportunity for further engagement with Lewisham Council in respect of the Reg 18 Local Plan, and its future iterations. 6.6 On behalf of SGN, Quod reserves the right to add to or amend these representations. This may be required where the Council issues new guidance or there is a change in policy at a local, regional or national level, or circumstances affecting the Sydenham gas works site.	Support and comments noted. Where pre-application discussions are likely to evolve, the council has used a SHLAA method to determine indicative site capacities – more details can be found in the Site Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the scale of development considered suitable for the site, taking into account the need to preserve the setting of the Livesey Memorial Hall, the need to retain the bowling green and tennis courts as open space and the need to deliver a revised land use mix more suited to the site's location. Based on these considerations, the capacity has been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Local Plan.	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended to increase residential capacity to 100 units (baseline scenario). Should the Bell Green area become an Opportunity Area, the residential capacity could increase u to 442 units. Employment floorspace has reduced to 465m^2 and main town centre uses have increased to 1,859m^2.
LaSalle Investment	3	LSA 01	*Relates to Part 3, LSA SA 10* **Part Three: Lewisham's South Area**	Support noted. Our response to site capacity is set out above.	No change.

Management (Savills obo)			***LSA1 South Area place principles*** LSIM supports the principles for redevelopment of Lewisham's South Area including the direction of new high quality housing and town centre uses to the A21 Corridor (Bromley Road). Whilst the Policy refers to the sensitive intensification of sites to deliver new high quality housing, LSIM would advocate that the Council captures greater potential the optimisation of such sites which will necessarily include encouraging an increase in heights and densities.	Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Local Plan.	
SGN (Quod obo)	3	LSA 01	*Relates to Part 3, LSA SA 01* **Lewisham South Area LSA1 (Chapter 17)** 4.36 Paragraph 17.4 states that there are "*two former gas holders, which are prominent landmarks*". The gas holders have now been demolished and this text should be updated. The reference to the site representing a local landmark is however welcomed and we concur that the site should continue to be used as a wayfinding marker through delivery of tall buildings on the site. 4.37 Paragraph 17.8 outlines the expectation that by 2040, a new neighbourhood at Bell Green retail park will be led through the masterplan, which will change the character of the area and create a new place through delivery of a new town centre and mixed-use residential developments. In achieving this, development at higher density at an urban scale that optimises the use of available land will be supported. 4.38 The Reg 18 Plan allocated a number of sites for development across Lewisham South Area which spans Bell Green, part of Lower Sydenham, Bellingham and Downham. The South Area (land around Grove Park station) is identified as a Strategic Area for Regeneration (LSA2), which will be the focus of public and private investment to deliver regeneration in collaboration with local community. 4.39 Contained within the Strategic Area for Regeneration is Bell Green and Lower Sydenham to which the Reg 18 Local Plan outlines the overarching ambition for this area to be designated as an Opportunity Area (LSA3) within a future review of the London Plan. The supplementary text for LSA3 outlines that development proposals within the Bell Green and Lower Sydenham area shall be guided by a Supplementary Planning Document or Masterplan. 4.40 The vision for the Bell Green retail park and allocation of Bell Green and Lower Sydenham as a future Opportunity Area is fully supported by SGN. However, the existing site allocation for the gas works site, in a prominent location to the entrance of the new neighbourhood does not sufficiently optimise the site potential, and its site allocation should be reviewed to support higher density development at an urban scale. The need to replace the landmarks of the gasholders to help wayfinding of the new settlement should also allow tall buildings to be delivered on the site. 4.41 In view of the above, Policy LSA1 should be updated as follows: *A. Development proposals must make the best use of land in helping to facilitate Good Growth and focussed regeneration, particularly to tackle inequalities and*	Agree that the text on the gas holders needs updating and the point regarding urban scale. Support for Opportunity Area noted. Tall buildings	Local Plan updated to state that the gas holders have been demolished and using the wording proposed.

			the environmental, economic and social barriers that contribute to deprivation locally. This will require that investment is appropriately coordinated within Lewisham's South Area and that: *The out-of-centre Retail Park, former Gas Works and other sites at Bell Green and Lower Sydenham are comprehensively redeveloped at a higher urban density to create a new high quality residential, mixed-use quarter that is well-integrated with its surrounding area.*		
Tetra Tech Planning (John Lyon's Charity obo)	3	LSA 01	**Do you have any comments on the proposed approaches for the area?** **LSA1: South Area Principles** The 14 principles provide a very detailed list, setting out specific economic, social and environmental principles, which are welcomed. The principles reflect the London Plan's (2021) 'Good Growth strategy' in seeking to make the best use of land and the Charity welcomes those specific principles which recognise the importance of delivering affordable housing and supporting inclusive and mixed communities. The comprehensive redevelopment of the out-of-centre Retail Park, former Gas Works and other sites at Bell Green and Lower Sydenham is strongly supported. The Charity notes Principle A(f), "Land is safeguarded to secure the delivery of strategic transport infrastructure, including the Bakerloo line extension south to Hayes". The Charity is supportive of the Council's positive planning; however it does advocate a cautious approach to safeguarding land which may not come forward within the Plan period.	Support noted. Agree that a cautious approach is needed.	Local Plan amended to recognise that the Phase 2 of BLE may not come forward within the Plan period and that development potential of the area should not be solely predicated on it.
Phoenix Community Housing (BPTW obo)	3	LSA 02	**Lewisham's Neighbourhoods and Places** It is pleasing that the various neighbourhood boundaries are viewed as having a degree of overlap with each other, reflecting that communities define themselves around different spatio-functionalities and contexts. We would interpret the indicative capacity figures for each area of the borough being equally fluid. The division of the borough into five areas is a good way of recognising their starkly contrasting contexts, ranging from Deptford riverside to the garden-principled southern estates. The context and character description of South Lewisham is informative and accurate, and we view this as a sufficient acknowledgement of its heritage and prevailing urban form within a Local Plan document, without the need for designating any parts of it as Areas of Special Local Character. As aforementioned, such a designation in Bellingham or Downham would detract from the potential for 'sensitive intensification' in these areas, lessening the effectiveness of the spatial strategy for South Lewisham. Along with North Lewisham (which benefits from an Opportunity Area designation in the New London Plan), the Indices of Multiple Deprivation map identifies South Lewisham in general as the most deprived area of the Borough; save for isolated wards in Catford and Ladywell. Our previous representations expressed strong concerns with the proposed removal of the Local Regeneration Area category in the current Core Strategy which focused on South Lewisham. Therefore we are delighted to see, and wholly support, the re-instatement of a Strategic Area for Regeneration covering all of South Lewisham under policy LSA2. This policy objective will support the regeneration of these areas where this is significant need and potential to deliver much needed affordable and	Support and comments noted. Both LSA2 and LSA4 acknowledge the importance of walking and cycling, as well as the use of public transport. Agree that LSA2 Ca should also recognise the A21 Healthy Streets initiative.	Local Plan amended to acknowledge the A21 Healthy Streets initiative as being as being a significant infrastructure project over the Plan period, in addition to the BLE.

			sheltered housing stock. It will be vital to meeting strategic objectives, and its necessity has only been exacerbated by the higher housing targets set by the New London Plan and the delayed growth-concentration opportunities around the future Bakerloo line extension in the western end of South Lewisham. Sensitive intensification and regeneration will be of utmost importance to this plan period and South Lewisham is primed for it. To that end we would argue that item C(c) of the policy, which seeks incremental but transformational improvement in the quality of housing and living environments, will be the most important and most effective tool in South Lewisham. Further, it would be justified to replace item C(a) – which concerns the Bakerloo line extension – with one that highlights the A21 Bromley Road and Ringway Corridor Healthy Streets initiatives as being the most significant infrastructure projects over this plan period, and directing new development here. We will be commenting separately on the A21 Design Guidance SPD, but support the inclusion of policy LSA4 and its link with policy TR3 (healthy streets). The draft text should more explicitly require provision for walking, cycle, and bus routes as public/active transport along this corridor will be key to unlocking sustainable development in the central area of South Lewisham.		
L&Q Group	3	LSA 02	*Relates to Call for site* 4.9 South Character Area L&Q is supportive of the designation of the South Character Area as a 'Strategic Area for Regeneration' and the publication of further planning SPDs relating to the Bell Green and Lower Sydenham Area Masterplan and Small Sites Guidance.	Support noted.	No change.
Albacore Meeting Room Trust (Lichfields obo)	3	LSA 02	*Relates to Call for site* **(Part 2) Related Policy Areas** **(a) Lewisham's South Area: (LSA2) Strategic Area for Regeneration** The Trust supports the designation of the 'South Area' of the borough, which includes the site at Beckenham Hill Road, as a strategic area for regeneration under Policy LSA2. It is noted that the policy includes ambition to tackle inequalities in the Borough via the contributing environmental, economic and social barriers. This includes though supporting development proposals that seek opportunities to plan positively for social infrastructure that meets meet local needs, particularly community facilities and services catered to children and young people as well as those that remove barrier to movement across the Borough. Removing the Brethren Meeting Hall site from the MOL and allocating it for redevelopment to provide a new flexible community use building would assist and align with this policy aim. For example, the Citygate Church application proposes to make the auditorium available for the adjacent school to use for large events that it cannot accommodate within their own premises. The positioning of the site between the school and school playing fields represents an opportunity for the redevelopment of this site for replacement Community Use development, to incorporate a better access through the site to benefit young people.	Support noted. The comments regarding the site's development contributing to this policy are noted. The Council is undertaken a comprehensive review of all existing MOL and is not proposing to de-designate any.	No change.

			As set out above, allocating the land for redevelopment would create the opportunity to enhance the environmental value and accessibly of the site, which is currently predominantly hard standing and private.		
Stoken Properties Ltd (Boyer obo)	3	LSA 02	*Relates to Call for site* *Response to Draft Policy LSA2 (Strategic Area for Regeneration)* It is encouraging to see the Council recognise the need for the regeneration of this part of the Borough. We are pleased to see that the Council intend to pursue a partnership approach in order to ensure that public and private sector investment is secured within this area so that investment can be coordinated to successfully deliver regeneration in collaboration with local communities. The Policy advises that regeneration should be facilitated through a variety of approaches including the comprehensive redevelopment of strategic sites and renewal of town centres and employment locations. We are supportive of this approach and emphasise the important role that employment locations and their successful redevelopment can have for an area. A successful redevelopment of an employment area with commercial and residential uses can bring substantial and important benefits to both the local area and Borough as a whole by bringing an underutilised or vacant site back into a viable use. Redevelopment of such sites can result in the creation of more jobs in the Borough by making a more appropriate and efficient use of employment floorspace and the residential element will help the Council meet housing targets as well as bringing more inward investment for the Borough. Given the changing nature of the workplace and more people now working from home, it is important to acknowledge that traditional employment space is changing. It is now not uncommon for resident "work hubs" to form part of the commercial/employment offering in mixed-use development. We would encourage the Council to recognise changing working practices and to take a pragmatic view on these when deciding policy and any subsequent planning applications.	Support and comments noted. The changing nature of working practices resulting in the restructuring some employment sites that are more suited to mixed use developments (including some at Lower Sydenham/ Bell Green) have been identified in the Local Plan.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	3	LSA 02	**LSA2: Strategic Area for Regeneration** The Charity firmly supports the designation of a "Strategic Area for Regeneration" for the Southern area of the Local Plan. Notwithstanding the importance of the BLE and its potential delivery from Lewisham southwards, the Charity welcomes the Council's recognition of the need for development to enhance provision of and access to bus services and the network of walking and cycle routes, which will help connect communities. The Charity endorses the Council's commitment to working in partnership with key stakeholders, the comprehensive redevelopment of strategic sites and the sensitive intensification of sites and residential neighbourhoods to improve the quality of housing and living environment.	Support noted.	No change.
Next Plc (Q+A Planning Ltd obo)	3	LSA 03	*Relates to Part 3, LSA SA 02* 7. On this basis our client is concerned to note that the new Local Plan appears to propose the redevelopment of the site. Policy LSA3 C (b) refers to the Council's aim to *'deliver the comprehensive redevelopment of strategic sites in accordance with site allocation policies, including the … Bell Green Retail Park* '; while	Objection to the redevelopment of the Bell Green Retail Park is noted.	No change.

			Allocation 2 specifically identifies the Park as a redevelopment location for *'Comprehensive mixed-use redevelopment of the existing out-of-centre retail park with compatible residential, commercial, main town centre and community uses'.* 8. We accept that, according to LSA3 B, there is still further work to undertake on this proposal, since it is the Council's intention to *'prepare a Supplementary Planning Document and/ or Masterplan...',* which will '*..complement the Local Plan in setting a long-term development and investment framework for the area.'* Nevertheless, the general intent to secure redevelopment of the Park is made very clear in the emerging Local Plan.		
Stoken Properties Ltd (Boyer obo)	3	LSA 03	*Relates to Call for site* *Response to Draft Policy LSA3 (Bell Green and Lower Sydenham)* We generally support the policy objectives of Policy LSA3, which seeks to promote the growth and regeneration of Bell Green and Lower Sydenham. Whilst we are in general agreement with criterion c. of Part C of the Policy which seeks to protect the employment function of the LSIS and are encouraged to see that "other compatible uses" are acceptable in these areas, we feel that this should be expanded to make specific reference to residential development. Mixed-use development comprising commercial at ground with residential above is a well established principle of planning and such developments have been successful, and are prominent, throughout London. The residential element of such schemes can complement and facilitate the commercial element and can bring significant planning benefits such as increasing the Borough's housing supply. *Policy Wording* We set out below our response to specific parts of the policy and how the policy should be worded. For consistency, throughout this letter, anything underlined is our proposed wording to the policy. Part D, criterion c. of the Policy states: *c. Protect the employment function of the Locally Significant Industrial Sites at Stanton Square and Worsley Bridge Road, whilst seeking to deliver new high quality workspace, taking into account opportunities for the co-location of employment and other compatible uses;* We suggest that the criteria is expanded to make specific mention of residential use and reads *"…taking into account opportunities for the co-location of employment and other compatible uses <u>including residential where this is in agreement with other relevant Local Plan policies</u>;".* This inclusion provides certainty that a residential element would be considered acceptable provided it meets with other policies in the Plan and would not result in an overall negative impact on the economic functioning of the LSIS.	Agree that the Local Plan should be amended to include residential use.	Local Plan amended to reflect proposed wording.
Kier Property (Carter Jonas obo)	3	LSA 03	*Relates to Call for site* **Lewisham South Area 3 – Bell Green and Lower Sydenham**	The comments regarding the redevelopment of Bell Green contributing to this policy are noted.	No change.

			Good Growth is a key thread throughout the recently published London Plan and Lewisham is set to play an important role in achieving this key objective. There is no doubt that Lewisham South Area 3 (LSA3) can contribute towards achieving this. LSA3 comprises a number of site allocations to facilitate development in the Bell Green area. Our client's land should be incorporated as part of these site allocations as a result of its central location at the entrance of Bell Green Retail Park. The principle of development on the site should be supported by virtue of its brownfield nature. It can contribute towards the aims for LSA3 to be brought forward early in the plan process as indicated in the information table provided for the allocations, with the earliest timeframe for delivery in 2020/21-2024/25. The inclusion of our client's land will help facilitate cohesive development.		
Tetra Tech Planning (John Lyon's Charity obo)	3	LSA 03	**LSA3: Bell Green and Lower Sydenham** The Charity strongly supports the Council's commitment to enabling the designation of an Opportunity Area at Bell Green and Lower Sydenham in a future review of the London Plan. The Charity strongly supports the preparation of a Supplementary Planning Document and/or Masterplan for the Bell Green and Lower Sydenham area. Noting that this is document is listed within the evidence base in LSA1 South Area Principle N(c), and which states that "development proposals should have regard to and positively engage" with this document, it is imperative that the Council start the masterplanning process sooner rather than later and engage with key stakeholders, including landowners, business owners, developers and local communities to ensure a collaborative and joined-up process from the start. Part C(a) of Policy LSA3 states that development proposals will be required to "safeguard the land required to secure the delivery of the Bakerloo line extension south to Hayes". Three potential BLE Phase 2 stations have been highlighted in the Borough: "Ladywell, Catford and Lower Sydenham", however no formal consultation has been undertaken on these locations. Notwithstanding, clarification should be provided within the Local Plan as to the (provisional) extent of land required for BLE Phase 2; and it should be confirmed if this land should be safeguarded as set out in Policy TR2 (Part C), or whether the safeguarded land will extend further than the required 400m. The Charity understands the importance of comprehensive redevelopment of strategic sites. Those strategic sites could have a number of landowners and leaseholders therefore clear lines of communication should be developed now with all interested parties; and workshops set up to ensure that the comprehensive redevelopment of strategic sites is a realistic and achievable objective for the Council. The Charity supports the Council's consideration of the designation of a new town centre in the Bell Green and Lower Sydenham area. The area is subject to a significant level of proposed regeneration, with a broad mix of uses proposed, including housing, commercial, leisure and community facilities, which could provide a significant opportunity to create a vibrant and diverse new centre	Support noted, including for a new town centre at Lower Sydenham/Bell Green. The comment that the masterplan should engage with key stakeholders at the earliest opportunity is noted. Agree that the provisional extent of the land required for BLE Phase 2 and stations should be identified in the Local Plan.	Local Plan amended to identify provisional extent of land required for BLE Phase 2 and stations.

			which can respond in a more holistic manner to the changing and challenging conditions that existing town centres are experiencing. The Local Plan states that "The centre's role and function (i.e. position within the Borough's town centre hierarchy) will be established having regard to further detailed assessments and public consultation". The Charity welcomes and supports public consultation at the earliest opportunity.		
LaSalle Investment Management (Savills obo)	3	LSA 04	*Relates to Part 3, LSA SA 10* ***LSA4 A21 Corridor / Bromley Road*** LSIM supports the proposals for the transformation of the A21 corridor by making best use of land to deliver high quality, mixed use residential developments. It is noted that the Policy states that development proposals will need to have regard to the A21 Design Guidance SPD which is still yet to be formally published. It is recommended that reference to such a specific document is removed from the wording of the Local Plan to account for the fact that this may not be delivered or replaced by materially different guidance during the plan period.	Support is noted. Disagree as following Regulation 18 consultation, the A21 Development Framework has been endorsed by the council and forms a material consideration to be taken into account when planning for the redevelopment of sites in the A21 corridor.	Local Plan amended to update that the A21 Development Framework has been endorsed by the Council.
HHGL Ltd (G R Planning Consultancy Ltd obo)	3 3 3	LSA 04 LSA SA 10 Para 17.54-17.55	In relation to the Draft Plan, we note that Policy LSA4 and Site Allocation 10 identifies Homebase as part of an opportunity site for a residential led mixed-use scheme with an indicative capacity for 141 residential units and 5,694 square metres of main town centre uses. The latter is not defined in detail, but the supporting text at paragraphs 17.54 – 17.55 suggests that a wider range of uses will be sought with a mixture of "*compatible main town centre, commercial and community uses*." Other than the heading, there is no reference whatsoever to the existing Homebase or the important comparison role it performs in Catford or the large number of local jobs that the store supports, both directly and indirectly. There is also no reference to the implications of the proposed allocation for the future of the Homebase business. The clear inference of the proposed allocation is that Homebase would be forced to close. My clients consider that a planning policy/allocation which would precipitate the closure of its Catford Homebase would be contrary to national policy and specifically paragraph 80 of the National Planning Policy Framework (February 2019) (Framework). This states that planning policies should assist in creating the conditions in which businesses, such as Homebase, can invest, expand and adapt, as well as requiring significant weight to be placed on the need to support economic growth and local business needs. My client's wish to remain on their Beckenham Hill Road site as this is a well-established retail destination and comprises a store that meets their business requirements. As currently worded, they would, therefore, strongly object to Policy LSA4 in so far as it applies to the opportunity sites and Site Allocation 10. We would, of course, be happy to discuss with the Council changes to the policy/allocation that provided the option for my clients to remain on site (the status quo), to be incorporated within any viable redevelopment scheme or to be relocated to a site that was allocated for this purpose in the Draft Plan. Both the	Agree that current retail use should be retained, where possible. The site capacity allow for the re-provision of main town centre floorspace, although this is a matter for the landowner to consider, in consultation with leaseholders.	Homebase/Argos site allocation amended to reference re-provision of existing retail use providing other objectives for redeveloping the site (such as improved layout, walking, cycling, landscaping and alternative use of the surface car park) can be achieved.

			latter two options would be on the proviso that the allocation confirms that any redevelopment or relocation must meet Homebase's business, operational and customer requirements, and involve a development that was commercially viable. In the absence of any such options, as I confirmed, my clients will be left with no other way forward than to formally object to the Proposed Submission version of the Draft Plan and to pursue those objections at the Examination stage. My clients are keen to avoid the latter and their preference is to engage with the Council over its draft proposals and to discuss with Planning Officers changes to the Proposed Submission version of the Plan that would address Homebase's significant concerns with the plan as drafted.		
Southern Gas Networks (Carter Jonas obo)	3	LSA SA 01	SGN strongly support the decision of the Council to allocate the Site for development but their preference is for it to be fully residential. We consider this Site provides a fantastic opportunity to deliver much-needed housing in the Borough on an otherwise vacant and disused site.	Comment noted. The site allocation provides for a mixed use development which is replicated across the whole of the Bell Green masterplan area in order to create a new, sustainable neigbourhood.	No change.
Southern Gas Networks (Carter Jonas obo)	3	LSA SA 01	SGN broadly support the indicative densities provided and, subject to detailed design considerations and viability work, we consider the Site has the potential to deliver affordable housing and a variety of tenures. However, we do advise this could be more simply communicated as an *"up to"* capacity.	Support noted. The Local Plan (para 13.9) already states that the site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies.	No change.
Southern Gas Networks (Carter Jonas obo)	3	LSA SA 01	*LB Lewisham officer note: SGN's land ownership is included in the original representation. The map shows the extent of correct site boundary.* We do note there are some discrepancies between this Site Location Plan and the indicative red line boundary for the allocation. We suggest that the Council can extend the red line boundary of the allocation to include this excess land owned by SGN, thus further increasing its overall capacity. As noted by the Council, we also recognise the potential for capacity to be even further increased, subject to the outcome of the proposals to extend the Bakerloo Line beyond Lewisham to Beckenham Junction.	Boundary discrepancies are noted.	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended to show correct boundaries.
Southern Gas Networks (Carter Jonas obo)	3	LSA SA 01	We recognise the objective of the Council to transform the Bell Green and Lower Sydenham area into a potential Opportunity Area in a future review of the London Plan, as well as its intentions to deliver a Bell Green and Lower Sydenham Masterplan and/or SPD to ensure the comprehensive redevelopment of this area – including further allocations to the east and south. This longer-term plan would	Support noted. Agree that the timeframe for delivery be amended.	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended to show timescales for

			include the designation of a new town centre and a potential new Bakerloo Line station in the Bell Green vicinity. Whilst SGN support the principle of long-term, comprehensive regeneration that maximises the delivery of housing and opportunities provided through the Bakerloo Line extension, we urge the Council to closely consider potential delivery timescales. We observe that the Site is the only allocation in the Bell Green and Lower Sydenham area with a timescale for delivery, not least a *deliverable* timescale within the first 5 years of the Plan Period. SGN can confirm that the Site is available for development now. We observe that other allocations are presently occupied and would therefore inevitably have a longer delivery period.		delivery being within years 1-5 and 6-10.
Southern Gas Networks (Carter Jonas obo)	3	LSA SA 01 General	To conclude, whilst SGN strongly support development on the Site, a solely residential scheme is preferred and there is potential to increase the capacity through corrections to the developable red line boundary. In addition, we seek further clarity on how the Site would come forward at the earliest opportunity – including whether this could come forward in advance of the wider Masterplan.	Comments noted. Our response is set out above.	No change.
SGN (Quod obo)	3	LSA SA 01	**3 Challenges and Opportunities** 3.1 SGN welcome the Council's allocation of the site for redevelopment, however, the Regulation 18 Local Plan does not yet fully recognise the significant constraints associated with redeveloping former utilities sites. 3.2 Whilst the site allocation outlines the requirement for a ground survey to be undertaken to establish the nature of ground contamination and likely remediation, it is considered that the Reg 18 Plan does not yet recognise the significant limitations of cleaning up contaminated sites and specifically the cumulative constraints which arise from a re-development of gas works site will have an impact on deliverability, site capacity and viability. 3.3 Gas works sites fall within the Sui Generis use class. The exceptional nature of Gas Works sites are the abnormal costs that exist in the ground as a result of years of gas production and storage. The investment risk profile of gas works sites is very different from traditional brownfields sites, with significantly higher up front abnormal costs experienced over a longer period of time, and larger levels of cost uncertainty. 3.4 Finance holding costs are significant due to timeframe associated with these works, including regulatory approval, and the sequential order in which they have to be undertaken delaying the commencement of construction. For these reasons, national policy confirms that the Government gives substantial weight to the redevelopment and remediation of brownfield contaminated land, and the development of under-utilised land and buildings especially if this would help to meet housing needs. 3.5 Initial investigations into the level of contamination at the Sydenham gas works was submitted to Lewisham as part of the prior approval application submitted for the removal of the gas holders (DC/18/1070607). The site investigation works undertaken on site by Atkins in 2016 on behalf of SGN identified significant contaminates within the made ground (aromatic hydrocarbons, polycyclic aromatic hydrocarbons, sodium hydroxide, sodium	The supplementary information about the site's constraints including ground contamination and listed heritage features are noted. The site allocation already states ground surveys will need to identify the nature and extent of ground contamination, with remedial works and/or mitigation measures implemented, where necessary. Policies within the plan will be applied to this site in the same way as other sites. A viability appraisal will be needed to set out how the site constraints impact on the viability and deliverability of the site. The site allocation also mentions the Livesey Memorial Hall and provides references to other heritage assets on the site Following the Regulation 18 public consultation,	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended to state that the site is constrained by former gas infrastructure, including a gas mains and gas 'governor' and a bentonite wall; and that the Council recognises the challenges of delivering this site given the de-contamination and remediation required. Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended to include the Livesey Memorial Hall and its grounds within the site's boundary. Also amended to refer to the need to retain the heritage assets at the west of the site and incorporate them sensitively into the redevelopment of the remainder of the site, as well as acknowledging

			carbonate, sulphates, sulphides, carbonates, phosphates, cyanides, ammoniacal compounds, heavy metals and asbestos). 3.6 Contaminated material may also have been buried in underground tar wells, liquor wells, pipes and purifier beds and will require removal. Any redevelopment of the site will also need to rationalise the existing gas 'governor', underground gas mains and remove any other underground structures and obstructions. All of which will have a significant associated cost. 3.7 As demonstrated, in order to bring forward the Sydenham gas works site, substantial decontamination will be required to safely remove the soil and groundwater contaminated. The need for extensive de-contamination is even more critical in identification of emerging site allocation ambitions for residential uses and the delivery of an area of public realm. 3.8 The approach that the London Plan has recently taken to Gas Works sites provides a relevant basis from which Lewisham Council should draw recent experience. Extensive discussions have taken place across a number of Gas Works sites and the policy direction by the Mayor of London has facilitated the successful redevelopment of challenging sites, delivering a significant number of new homes, jobs and community benefits. 3.9 The implications of these complex site constraints are twofold: - ▪ **Financial viability**: The exceptional costs associated with site remediation/ constraints, drives the need for density on a viability level. As part of any future planning application SGN or a future owner, will submit detailed evidence demonstrating the gas works site is subject of substantial contamination, and associated enabling and remediation costs in order to bring the site forward for development. ▪ **Spatial / developable area:** The Gas Works site represents an opportunity to deliver a notable quantum of housing in order to meet local needs. It is therefore imperative that available, brownfield sites, such as the gas works, should be suitably optimised to deliver the level of homes that Lewisham Council need to deliver. The specific and bespoke spatial constraints of the site drive the need for height in order to bring forward the requisite level of development. 3.10 The complexity of delivering former utilities sites such as the Sydenham gas works site has not yet been fully recognised within the Reg 18 Plan and this will need to be addressed. We set out our recommendations for this in Section 4 of these representations. 3.11 Notwithstanding the limitation of the below ground conditions of the site, further challenges to the development of the site are presented by the adjacency of the Grade II listed Livesey Memorial Hall (Listing No. 1253110), war memorial (Listed No. 1253111) and boundary wall (Listing No. 1253121), which are clustered to the gas work's western boundary. 3.12 The Grade II listed Livesey Memorial Hall and boundary wall were first listed in 1995. The Livesey Memorial Hall and boundary wall were constructed by the South Suburban Gas Company to act as a workspace for the gas works, which employment 380 men in 1911. The Hall was named after Sir George Thomas	additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Local Plan. The site allocation recognises the need for the bulk and scale of development to transition through the site. Tall buildings will not be appropriate across the whole site due to the proximity to, and the setting of the Livesey Memorial Hall and it's grounds.	that tall buildings will not be appropriate in the western part of the site where maintaining the setting of the heritage assets should be prioritised.

			Livesey, an engineer, industrialist and philanthropist who was the director of the South Suburban Gas Company and credited as a pioneer of the gas industry. 3.13 The Grade II listed war memorial was unveiled in 1920 to commemorate the employees of the South Suburban Gas Company who lost their lives in the First and Second World Wars. The memorial was listed in 1995. 3.14 The significance of the adjacent heritage assets is intrinsicality linked to the historic function and operation of the gas works. In view of the gas works now obsolete industrial function, an alternative use for the site is promoted within the Reg 18 Local Plan and SGN. 3.15 The eventual redevelopment of the site must continue to respect the significant and setting of the listed assets, however, it should be acknowledged that the Livesey Memorial Hall, boundary wall and war memorial were original constructed with an industrial backdrop and were seen (until 2019) in the context of two gas holder structures rising to 25m and 35m in height respectively (equivalent of 7-10 residential storeys), which when fully inflated offered significant massing. 3.16 In consideration of the industrial and historical context of the gas works site, the significant contamination limitations, and the National and London Plan policies for such sites, we consider that the Reg 18 Plan site allocation should recognises these challenges of delivery and the need for site optimisation, where tall buildings would be a suitable typology to achieve this subject to respecting and preserving the significance and setting of the adjacent listed heritage assets.		
SGN (Quod obo)	3	LSA SA 01	**4 Site Allocation 1 and LSA1 South Area – Representations** 4.1 The following section considers the emerging Site Allocation 1 Former Bell Green Gas Holders and Chapter 17 Lewisham South Area. **Site Allocation 1 - Former Bell Green Gas Holders** **Indicative Capacity** 4.2 The indicative capacity of the site is for 73-178 homes, and gross non-residential floorspace of up to 2,345sqm (including 782sqm of employment and 1,563sqm of town centre). 4.3 The Council's site allocation background paper (2021) confirms that the site's indicative residential capacity has been derived from the London-wide SHLAA methodology rather than a needs assessment, pre-application discussions or through a masterplan. 4.4 LSA3 outlines that development within Bell Green and Lower Sydenham shall be guided by a Supplementary Planning Document or Masterplan. Accordingly, we consider it inappropriate for the site capacities to be set through an arbitrary SHLAA methodology rather than through a site-specific analysis, particularly for a complex site such as the Sydenham gas works site. 4.5 Appendix A Table A.2 identifies the site with the following land use capacity: 65% residential; 20% main town centre; 10% employment; and 5% other. This land use mix conflicts with the general assumptions of uses for mixed-use development sites in Bell Green/Lower Sydenham masterplan, which identifies a	The Local Plan (para 13.9) already states that the site capacities are indicative only and should not be read prescriptively for the purpose of planning applications. The plan should be read as a whole. Disagree that the site should be solely residential and disagree with the indicative capacities proposed. Where no advanced pre-application has taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper.	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended to increase residential capacity to 100-442 units, to decrease employment floorspace to 465m^2 and to increase main town centre uses to 1,859m^2.

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<td>mix of 70% residential; 20% main town centre, and 10% employment. Whilst the site allocation background paper (2021) confirms that the indicative capacities should not be read prescriptively, they may unintentionally raise local communities' expectations around the appropriate capacity prior to any design analysis. The actual development capacity of a site will ultimately need to be determined through the detailed design and planning approval process and this should be made clearer in the Reg 18 Plan itself.

4.6 The London Plan sets out a design-led approach to determining the optimum development capacity of sites. To accommodate the growth identified in this Plan in an inclusive and responsible way, every new development needs to make the most efficient use of land by optimising site capacity. Policy D1 B (3) 'London's form, character and capacity for growth' is clear that boroughs should follow the design-led approach (set out in Policy D3 'Optimising site capacity through the design-led approach') to establish optimised site capacities for site allocations. Paragraph 3.3.4 of Policy D3 acknowledges that this should be through a consultative design-led approach that allows for meaningful engagement and collaboration with local communities, organisations, and businesses.

4.7 In consideration of the indicative land use mix, the site allocation capacity should be revised to better reflect the site's opportunities and London Plan policies.

4.8 Prior to demolition, the gasholders on the site did not accommodate any employment floorspace and therefore this floorspace does not need to be re-provided as part of any new scheme. Accordingly, there is no obligation for the re-provision of employment floorspace as part of the site allocation and this capacity (782sqm) should be removed and re-allocated to the residential capacity to further optimise the gas works site as a strategic source of housing land.

4.9 Further, the draft site allocation includes reference to community uses as being appropriate for the comprehensive mixed-use redevelopment of the site. An indicative community floorspace capacity would be challenging given the scale of the site and constrained nature.

4.10 We therefore request the following amendments are made:
<table>
<tr><td>Indicative Development Capacity</td><td>Regulation 18</td><td>SGN Revisions</td><td></td></tr>
<tr><td>Net residential</td><td><s>73-178 units</s></td><td>230-300 units</td><td></td></tr>
<tr><td>Employment</td><td><s>782 sqm</s></td><td>0 sqm</td><td></td></tr>
<tr><td>Main Town Centre Uses</td><td>1,563 sqm</td><td>< 1,563 sqm</td><td></td></tr>
</table>

4.12 SGN welcomes the opportunity to enter discussions to help inform this approach and better inform the indicative capacity of the site and better link this capacity to the objectively assessed needs; whilst taking account of the delivery challenges of gas works sites and other draft policies contained within the Reg 18 Plan such as affordable housing.</td>
<td>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need to provide mixed use development with a different land use mix, to create a new sustainable neighbourhood, to retain continued community uses in the Livesey Memorial Hall as well as protecting the it's setting. -Based on these considerations, the land use mix and residential units have been amended.

Optimal capacity for the site will be established at planning application stage through a design led approach.</td>
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<tr>
<td>SGN
(Quod obo)</td>
<td>3

3</td>
<td>LSA SA 01</td>
<td>Site Allocation (Paragraph 17.16)
4.11 SGN broadly support the principles of the site allocation, albeit to conform to London Plan policy we propose the following amendments.</td>
<td>Disagree, commercial uses are needed as part of a mixed used development, to create a new,</td>
<td>No change.</td>
</tr>
</table>

		Para 17.16	*"Comprehensive mixed-use redevelopment with residential, ~~commercial~~, and main town centre ~~and community~~ uses. Public realm and environmental enhancements, including new walking and cycle routes, and public open space".*	sustainable community. Community uses will continue to be provided in the Livesey Memorial Hall.	
SGN (Quod obo)	3 3	LSA SA 01 Para 17.17	**Opportunities (Paragraph 17.17)** 4.13 SGN broadly support the opportunities section albeit propose removal of the following text: *"The site comprises a former gas works which is now vacant, with the gasholders having been dismantled. Redevelopment and site intensification, along with the introduction of a ~~wider~~ range of uses, will bring the land back into active use and support local area regeneration"* 4.14 We also consider that the following opportunities for the site should be included within the site allocation, a number of which are commonly found across other local plans which include gas works sites. • It is noted that the former gasholder structure was a significant landmark in the area. • The site contained two former gas holders and significant infrastructure that supported its former use, including a gas mains and gas 'governor'. The combination of these factors is likely to have an impact on deliverability, capacity and viability. • Given the industrial nature of the site, it is likely to be contaminated and/or have services running through it. Further consideration will need to be given to fully understand specific contamination and/or servicing issues. • Proposals should respond to constraints associated with existing utilities restrictions, easements or HSE guidance as appropriate. • Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on-site decontamination requirements caused by the gasworks. • For site allocations, the policies set out in this plan may be applied flexibly to ensure that the sites are viable and deliverable.	Agree that the site's previous use as a gas holder should be further acknowledged. The need for ground surveys and remedial works are already mentioned in the site allocation. Policies within the plan will be applied to this site in the same way as other sites. A viability appraisal will be needed to set out how the site constraints impact on the viability and deliverability of the site.	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended by removing the word "wider", and referring to the retained elements of the gasholder structures, existing utilities infrastructure and the challenges associated with remediation of the site.
SGN (Quod obo)	3 3	LSA SA 01 Para 17.18	**Development Requirements (Paragraph 17.18)** 4.15 The site allocation outlines that any future development should be brought forward in accordance with Bell Green and Lower Sydenham masterplan. In absence of such masterplan or timeframe for this document to be published or made available, it is considered that this wording is contrary to the site's delivery timeframe period of 2020-2025. In absence of an emerging masterplan, it is recommended that the obligation for a development to be brought forward in compliance with this masterplan is removed or greater clarity given on timeframes for publication of this document. 4.16 We recommend that the Bell Green and Lower Sydenham masterplan should be published in tandem with the adoption of the Lewisham Local Plan to ensure there is no undue restriction placed on the delivery of sites across Bell Green and Lower Sydenham in the absence of the Masterplan. SGN would welcome the opportunity to work with Lewisham in preparation of a Masterplan. 4.17 SGN request that the following changes are made to the supplementary text:	Disagree A masterplan plays a critical role in clarifying design, capacity and phasing of the site, especially where there is a cluster of sites being transformed into a new, sustainable neighbourhood. Masterplans are already covered in Policy DM3 (Masterplans and comprehensive development) and there is merit in the site allocation referring to it.	No change. Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended to make reference to Policy DM3 (Masterplans and comprehensive development)

			• ~~"Development must be delivered in accordance with a master plan for the Bell Green and Lower Sydenham area."~~	Your interest in being involved in the masterplan is noted.	
SGN (Quod obo)	3 3	LSA SA 01 Para 17.18	4.18 The site allocation includes a need to safeguard land to support the delivery of strategic infrastructure including the Bakerloo line extension. Whilst SGN are fully supportive of the Bakerloo extension and acknowledge that its delivery is a key driver to the regeneration of Bell Green and Lower Sydenham and its future designation as an Opportunity Area; the extension of the Bakerloo line beyond Lewisham to Lower Sydenham is currently the subject of consultation and there are no formal commitments from Transport for London in respect of its delivery or future funding. More pertinently, no site options have been identified and/or safeguarded as future location(s) for the new Lower Sydenham Bakerloo station. We note Lewisham Council have previously identified two potential locations for a new station, one of which is to/around Southend Lane. 4.19 There is no safeguarding requirement in this location, and accordingly the following text should be removed from the site allocation's development requirements: ~~*Safeguard land to support delivery of strategic transport infrastructure, including where required for the Bakerloo line extension.*~~	Disagree. A cluster of sites are proposed for development within the Bell Green masterplan area, in order to create a new, sustainable neighbourhood. Whilst a railway station will most likely be positioned in close proximity to the Hayes railway line, other strategic transport infrastructure may be needed and retaining this reference will provide flexibility.	No change.
SGN (Quod obo)	3 3	LSA SA 01 Para 17.19	**Development Guidelines (Paragraph 17.19)** 4.20 The site allocation sets the expectation that any development should deliver a cohesive and rational road network and street pattern in co-ordination with other adjacent site allocation. Any proposal will also be expected to investigate opportunities to reconfigure or remove the gyratory. 4.21 Given the limited size of the site and the quantum of development that is necessary to be accommodated; the ability to provide a cohesive road network and street pattern would significantly curtail the developable area of the site and should therefore be removed. For the same reason, the site's ability to reconfigure or remove the gyratory is unachievable, and accordingly, we request that these elements are removed from the site allocation. 4.22 SGN are supportive of the ambition to improve walking and cycling links across the site and to deliver better connections to the surrounding area. It should however be noted that land to the north and west of the site is not within SGN's control and is currently under private ownership. The ability to deliver improved walking and cycling routes through the site to the north and west are therefore likely to be undeliverable. 4.23 Accordingly, we request that the development guideline text is updated as follows: *Development should deliver a more cohesive* ~~*and rational road network and*~~ *street pattern, in coordination with other site allocations. There is an opportunity to open up new walking and cycle links to the east* ~~*west*~~ *and* ~~*north*~~ *south of the site, to create a legible and more permeable network of routes that connect to the surrounding neighbourhood areas.* ~~*Proposals will be expected to investigate opportunities to reconfigure or remove the gyratory as part of an area-wide strategy.*~~	Agree.	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended using proposed wording.

SGN (Quod obo)	3 3	LSA SA 01 Para 17.19	4.24 The current wording of the site allocation outlines that any future development should seek to optimise the capacity of the site taking into account future planning transport accessibility levels as associated with the Bakerloo line extension. 4.25 In order to fully optimise the site capacity, it is recommended that the gas works site should be defined as an appropriate location for tall buildings. The optimisation of brownfield sites in opportunities areas and the delivery of development at higher densities is supported by the London Plan (Policy H1, Footnote 59 and GG2). 4.26 Further justification for the site's appropriateness for tall buildings is provided in identification of the height of the former gas holder structures (35m), the proximity of existing tall buildings in the vicinity of the site (namely, the eight storey Orchard Court development), and the allocation of the adjacent sites as suitable for tall buildings at Figure 5.1 of the Reg 18 Plan. 4.27 We recommend the following amendments to bullet two: *To achieve the optimal capacity of the site and promote Bell Green and Lower Sydenham as a future opportunity area, tall buildings of up to 35m in height (10 residential storeys) to aid legibility, wayfinding and the delivery of the site given its constraints may be acceptable subject to a sympathetic design that respects the Area of Special Local Character*. ~~*development proposals should take into account future public transport accessibility levels, as associated with the Bakerloo line extension.*~~	Disagree. The site allocation recognises the need for the bulk and scale of development to transition through the site. Tall buildings will not be appropriate across the whole site due to the proximity to, and the setting of the Livesey Memorial Hall and it's grounds. Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Local Plan. Optimal capacity for the site will be established at planning application stage through a design led approach and tall buildings will be considered in line with Policy QD4 (Building heights).	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended by acknowledging that tall buildings will not be appropriate the western part of the site where maintaining the setting of the heritage assets should be prioritised.
SGN (Quod obo)	3 3	LSA SA 01 Para 17.19	4.28 The fourth bullet point states that development should be designed to provide an appropriate transition in bulk, scale and massing from the site to its surrounds, which are predominantly suburban in character. 4.29 The development guideline contradicts the site allocation and the strategic vision for Lewisham South Area (Paragraph 17.8), which identifies that the site is within an *'Urban'* setting, and the future redevelopment of the area shall be brought forward comprehensively in an Urban character. The London Plan also requires sites such as this to be optimised as a strategic source of housing. 4.30 The text should be updated as follows: *Development should be designed to provide an appropriate transition in bulk, scale and massing from the site to its surrounds.* ~~*which are predominantly suburban in character.*~~ *Tall buildings may be appropriate in this location to address the challenges of delivery and to achieve other policies of this plan. The site is predominantly* ~~*sub*~~*urban in character.*	Disagree that the site should achieve an urban setting, given the presence of heritage assets on-site. Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Local Plan. Our response to tall buildings is set out above.	No change.
SGN (Quod obo)	3 3	LSA SA 01 Para 17.19	4.31 Bullet point six outlines that a ground survey shall be undertaken to establish the extent of ground contamination and level of remediation required. 4.32 As demonstrated, the site is known to have significant below ground contaminates that will require costly decontamination. The draft site allocation	Disgree with the wording proposed. Policies within the plan will be applied to this site in the same way as other sites. A viability	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation *amended to state:* That the Council

			development guidelines do not sufficiently consider this constraint and accordingly, SGN request the following additional wording: *Ground surveys will need to identify the nature and extent of ground contamination, with remedial works and/or mitigation measures implemented, where necessary. The Council recognises the need for significant remediation of the site, which will be taken into account as part of the development's viability assessment and will be considered when assessing the site requirements for affordable housing and other policies.*	appraisal will be needed to set out how the site constraints impact on the viability and deliverability of the site.	recognises the challenges associated with significant decontamination and remediation of the site
SGN (Quod obo)	3 3	LSA SA 01 Para 17.19	4.33 SGN request that the challenge of delivering a site in an opportunity area be recognised and therefore aligned to GLA policy. The Mayor's Affordable Housing & Viability SPG states that *"Opportunity Areas and Housing Zones are key sources of housing supply in London. They are, by their nature, complex to bring forward and often require significant investment in infrastructure. They are also of a scale that can create fundamentally new places and communities".* 4.34 The site allocation should provide an element of flexibility to affordable housing provision as set out in the Mayor's Affordable Housing & Viability SPG. The SPG states *"when considering Opportunity Areas, Housing Zones and industrial land, LPAs may wish to apply a localised affordable housing threshold for the Fast-Track Route". SGN* therefore proposes the inclusion of a new bullet point: *(Bullet Eight) "The site is located within an Opportunity Area. Opportunity Areas are key sources of housing supply in London. They are, by their nature, complex to bring forward and often require significant investment in infrastructure. The Council will take into consideration the viability challenges of the site when assessing the requirements under affordable housing and other policies."*	Disagree. Whilst Opportunity Area status is an aspiration for the Bell Green/Lower Sydenham area, it is not currently designated as such and it would be premature to refer to it as an Opportunity Area.	No change.
SGN (Quod obo)	3 3	LSA SA 01 Para 17.19	4.35 Finally, to reflect the significant limitations of the site, we request that the following text is included by the site allocation for the Sydenham gas works as a new bullet point: *(Bullet Nine) The site contains existing utilities restrictions, easements; a Hazardous Substances Consent; a former gas holder and significant infrastructure that supported its former use, including a gas mains and gas 'governor'. This site, may be subject to substantial decontamination, enabling and remediation costs which may have an impact on deliverability and viability. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring the site forward for residential led mixed-use* development (in accordance with LPH1, LP Footnote 59 and the site allocation) then the Council may apply flexibility to the policies set out in the Reg 18 Plan.	Disagree. Recognition regarding site constraints, remediation, deliverability and viability have already been mentioned in the site allocation.	No change.
Next Plc (Q+A Planning Ltd obo)	- 3	General LSA SA 02	**LB LEWISHAM LOCAL PLAN – 'MAIN ISSUES AND PREFERRED APPROACHES' REPRESENTATION ON BEHALF OF NEXT PLC** 1. Q+A Planning Ltd is instructed by Next plc to respond to the current consultation on the new 'Lewisham Local Plan – Main Issues and Preferred Options'. Having reviewed the consultation material, we wish to comment on the proposed allocation for redevelopment of the existing Bell Green Retail Park, as identified in South Area Policy LSA3 and Allocation 2.	The supplementary information is noted.	No change.

			2. Our client operates a Next store at Bell Green Retail Park. The Park is a relatively recent development, having been completed in 2013. It is successful and provides a valuable service to the community of south Lewisham and the surrounding area. 3. The Park serves a densely populated area with significant levels of trade coming from within a radius of a few miles. It is accessible by a choice of means of transport, and also benefits from its proximity to the Bell Green Sainsbury's supermarket, which allows customers to visit both locations on a single trip. 4. The recent pandemic has highlighted the importance of good local provision of retail facilities. Since March 2020, Next's outlets in retail parks have significantly outperformed those in city centres and regional shopping centres. Shopping habits changed during the pandemic as customers preferred the convenience and environment of retail park-style locations, while city centres suffered from the loss of office workers and general footfall. 5. Moreover, although on-line sales have increased rapidly since March 2020, these too have an important relationship with the company's store portfolio. Before the pandemic, online customers collected nearly 50% of their orders and returned over 80% of returns through stores, and this important interaction between on-line ordering and physical outlets is expected to continue in the future. 6. In short, the company has found that Bell Green is a successful trading location. Its store there provides a valuable service which is popular with local customers, and is expected to provide an important part of the company's representation in this area of London in the future.		
Next Plc (Q+A Planning Ltd obo)	3	LSA SA 02	9. There are a number of points to be made about the Council's intentions at Bell Green. In particular: • The replacement of the Retail Park with other uses, with the consequent loss of the important retail and service function and the substantial level of existing employment it provides, does not appear to be justified anywhere in the Plan. We are not aware of any evidence to show that the Council has considered the current and future role of the Park, and found it in some respect to be unsatisfactory. We note the Council's view (page 244) that *'the future of out of centre retail parks needs to be considered'* but cannot see the sort of detailed evaluation of the current and future role of the park that would be expected to be undertaken, before a decision is taken that it is an appropriate location for redevelopment; • The loss of a significant retail location also seems surprising, since the Council already acknowledges (page 243) that it is likely to need to *'about 5,300 square metres of new retail floorspace … by 2030'*; • Early redevelopment of a recently-built retail park would not appear to be a sustainable approach given the significant expenditure of energy and materials that would have been committed at the time of the scheme's construction; and • It is not clear that the redevelopment will be deliverable, particularly if existing occupiers including our client wish to remain trading at the Park in future. It has long been accepted that deliverability is a fundamental aspect of sound	Objection to the redevelopment of the Bell Green Retail Park is noted. The site allocation does not preclude the re-provision of retail units within the redeveloped site but the concerns over site delivery and that one of the site allocations landowners wants to remain trading are noted.	No change.

			allocations in a new Plan, and in this instance there would appear to be significant doubts about the likelihood of a successful and relatively recent retail park becoming available for redevelopment. 10. We note also that the emerging Plan places emphasis on the importance of working together with stakeholders to deliver good quality developments. We support this approach but envisage that in this instance partnership working with occupiers could be aimed at securing the future of the Park, and maximising its benefits in terms of the valuable and popular local service that it provides to residents of the area. 11. Accordingly, we object to the Council's proposed allocation of the Bell Green Retail Park as a location for comprehensive development, in that it would threaten the future of our client's successful and popular retail facility. Moreover, the proposed redevelopment does not appear to be justified either by a thorough and detailed examination of the current and future role of the Park, nor an assessment of the likelihood of securing redevelopment.		
Tetra Tech Planning (John Lyon's Charity obo)	- 3	General LSA SA 02	On behalf of our client, John Lyon's Charity, landowners of "Trade City", Bell Green, Sydenham, we respectfully submit the following representations to the "Local Plan Regulation 18: Main Issues and Preferred Approaches" consultation. John Lyon's Charity ("the Charity") can trace its roots back to the 16th century and exists to give grants to benefit children and young people up to the age of 25 across several boroughs in London. The Charity's mission is to promote the life-chances of children through education and they support a wide range of projects that provide opportunities for young people including youth clubs, arts projects, counselling initiatives, parental support schemes and academic bursaries. Since 1991, the Charity has distributed over £156million to a range of services for young people. The Charity generates much of its income through property investment such as Trade City. The Charity welcomes the opportunity to respond to the Regulation 18 consultation and looks forward to working with the Council in developing its vision and objectives for the Local Plan, the South area and specifically 'Site Allocation 2: Bell Green Retail Park', which includes its landholding, Trade City. Trade City consists of 15 industrial/warehouse/trade counter units with associated parking set within landscaped areas. In responding to the Regulation 18 consultation, the Charity sets out its responses to a number of key areas which it considers to be central to the delivery of Good Growth over the Plan period. In each key area, we respond to the questions specifically asked by the Council.	The supplementary information is noted.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	3	LSA SA 02	**Do you have any comments on the proposed site allocations?** **Site Allocation 2 – Bell Green Retail Park (which includes "Trade City")** Bell Green Retail Park and Trade City are successful and very popular destinations both in the area and across south-east London. The Charity supports the inclusion of its holding ("Trade City") within the proposed site allocation known as "Bell Green Retail Park" (No.2), a site	Support noted. Agree that a masterplan plays a critical role in clarifying design, capacity and phasing of the site.. Masterplans are already covered in Policy DM3 (Masterplans and comprehensive development) and there is	Bell Green Retail Park site allocation amended to make reference to Policy DM3 (Masterplans and comprehensive development) and public access to Waterlink Way and the SINC.

			allocation which is brought forward within all three spatial strategy options and the preferred option. The Charity strongly supports the "Comprehensive mixed-use redevelopment of the existing out-of-centre retail park with compatible residential, commercial, main town centre and community uses". The Charity supports the Council's commitment to maintaining the strong retail offer in this location, particularly in light of the ongoing pandemic and its impact on the 'High Street'. We would agree with the findings within the IIP that there "is a degree of risk associated with mixed used redevelopment of existing employment sites under higher growth scenarios, in that provision of space for existing or future light industrial uses could be compromised or prove challenging to deliver" . The Charity recognises the role that any forthcoming Supplementary Planning Document and/or Masterplan will play in clarifying design options, development capacity and phasing, and reiterates once again the importance of such a process coming forward as a matter of urgency. The Charity also supports its comprehensive redevelopment through reconfiguration of existing buildings and spaces to facilitate a new layout with improved routes, both into and through the site, which will assist vehicle users and pedestrians alike. The retail park's location, adjacent Pool River offers significant opportunities to provide a high-quality environment; providing walking and cycling facilities for residents, visitors, shoppers and staff. An indicative development capacity for both residential units and non-residential floorspace is provided. We note that these indicative capacities have been based on "the density assumptions used in the London-wide SHLAA (2017) methodology… which informed the draft new London Plan (Intend to Publish version)". We would note that the new London Plan (March 2021) no longer includes the density matrix and development capacity should be brought forward based on a design-led approach. The development guidelines state that the "Development **must** (our emphasis) be delivered in accordance with a master plan for the Bell Green and Lower Sydenham area. Considering the Council's definition of "Masterplan" in the Glossary of the Local Plan and the extensive detail that is included, it would be remiss of the Council to delay the work necessary for such a significant Masterplan any longer. The Charity has not been approached by the Council to provide its views on a Masterplan for the area and therefore if this work has not commenced it is imperative that it does start now. If work has commenced, we can confirm that the Charity wishes to be involved. The development guidelines advise that "to achieve the optimal capacity of the site, development proposals should take into account future public transport accessibility levels, as associated with the Bakerloo line extension". According to the TfL's WebCAT PTAL site, the PTAL for the site does not change in the forecast year of 2031 and remains at PTAL 1b/2 across the site, therefore this is an unknown element.	merit in the site allocation referring to it. Your interest in being involved in the masterplan is noted. The site allocation already makes reference to the Pool River but there is merit in emphasising public access to it. Whilst the London Plan density matrix no longer exists, a SHLAA based approach has been used as a starting point in determining site capacities. In many instances sensitivity testing has been applied, to take into account the site's characteristics and surroundings. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need to provide mixed use development by introducing residential units, as well as a revised land use mix. -Based on these considerations, the capacity has been amended. In particular, a range of residential capacities have been included in the site allocation, with the lower figure based on a baseline scenario and the higher figure based on a growth scenario which envisages the delivery of the BLE south of Lewisham and the	Bell Green Retail Park site allocation amended to increase residential capacities to 784-1,831 units. Employment floorspace has been reduced to 3,740.

				Bell Green area designated as an Opportunity Area. Optimal capacity for the site will be established at planning application stage through a design led approach.	
Stoken Properties Ltd (Boyer obo)	3	LSA SA 04	*Relates to Call for site* *Stanton Square Locally Significant Industrial Site* Stoken Properties Ltd. own the northern part of the site as identified on the accompanying Site Location Plan and known as 491-499 and 501-505 Southend Lane. We are pleased to see that the site has been included within the Local Plan as an area with potential for mixed-use development, and set out our thoughts and comments below. In terms of opportunities, we are extremely supportive that the redevelopment and site intensification potential of the site with the co-location of commercial and other uses has been acknowledged by the Council. As detailed within the accompanying Call for Sites application, it is considered that the site may come forward as phased development with the first phase facilitating future phases. It is therefore important to ensure that any phased development will not prejudice the future development of the rest of the site. With regards to development requirements, it is encouraging to see that a masterplan for the site is proposed and we would welcome future involvement in the preparation and discussions involving any such masterplan. Whilst we support that development must not compromise the functional integrity of the employment location, we again would seek clarification on the use of "capacity" and suggest that it relates to employees as opposed to floor area to take into account new and evolving working practices. We are in general agreement with the development guidelines including that in order to achieve optimal capacity of the site that development proposals take into account future public transport accessibility levels, as associated with the Bakerloo line extension. This ensures an efficient use of the site, maximising its planning potential and is supported. We are in agreement that non-employment uses, including residential uses, should be sensitively integrated into the development in order to ensure the protection of amenity for all site users. This would indicate that less industrial intensive uses such as workshops and studios, which have been proven to successfully exist with residential uses, would be appropriate at this location and would help deliver the Council's aspirations for the site. We would suggest that the site allocation is kept in the Local Plan given the substantial planning opportunities it presents in terms of providing a more optimal use of land to deliver the Council's ambitions for the Lewisham South	Support noted. Comments relating to stakeholder engagement in the masterplan are noted. Agree there is merit in referencing phasing of development across the site. Supplementary text to Policy EC2 Protecting employment land and delivering new workspace provides clarity on the net loss of industrial capacity. Table 8.3 also provides a formula for calculating financial contributions for the loss of industrial capacity. The Plan should be read as a whole.	Stanton Square LSIS site allocation amended to reference co-location and phasing of the development, working in partnership and Policy DM3.

			Area. The mixed-use redevelopment of the site will make an important contribution to the overall economic and social objectives of the Plan and has the potential to deliver a significant quantum of residential development alongside high quality commercial floorspace, which will help meet housing targets.		
Tesco Stores Ltd (Lichfields obo)	- 3 3	General LCA SA 06 LCA SA 19	**Representations to Main Issues and Preferred Approaches consultation for the Lewisham Local Plan (Reg 18) on behalf of Tesco Stores Ltd** **Tesco Stores at Conington Road, Lewisham (SE13 7PY) and Catford Shopping Centre and Milford Towers, Catford (SE6 4J)** Lichfields has been instructed by our client, Tesco Stores Ltd (hereafter referred to as 'Tesco'), to review the draft Plan having regard to its two retail store and property interests above and to submit representations to the Main Issues and Preferred Approaches consultation for the Lewisham Local Plan (Reg 18) ('LLP'). Please see below: • our comments on the vision and spatial objectives for Lewisham's Central Area; • our comments on retail parking; • our site-specific representation in relation to the Tesco superstore, petrol filling station and car parking site at Conington Road and Lewisham Road which is covered by draft site allocation SA6; and • our site-specific representation in relation to the Tesco large supermarket and car parking at Catford Shopping Centre, which is included within draft site allocation SA19;	Comments noted.	No change.
Tesco Stores Ltd (Lichfields obo)	- 3 3	General LCA SA 06 LCA SA 19	We trust that our representations will be taken into consideration in the progression of the emerging Lewisham Local Plan. We would be grateful for the opportunity to meet with you to discuss our suggested amends to the above policies and the Lewisham SA6 and Catford SA19 allocations.	Comments noted.	No change.
L&Q Group	3	LSA SA 08	We note that the 'Opportunities' section of Site Allocation 8 – Excalibur Estate, which is being developed by L&Q in partnership with Lewisham Homes, is incorrect. At the time of writing, Phase 1 is only partially complete (Sub-phases 1A and 1B are practically complete, with Sub-phase 1C aiming to start on site later this year) and Phase 2 has not yet been started. We would be grateful if the site allocation could therefore be updated accordingly.	Agree.	Excalibur Estate site allocation amended to reflect the current delivery of the site.
HHGL Ltd (G R Planning Consultancy Ltd obo)	- 3	General LSA SA 10	Please find attached representations to the above plan submitted on behalf of my clients, HHGL Ltd. As I have explained in the letter, my clients appreciate that these comments are submitted late, but in view of the flexibility that the local plan system offers and the importance of our representations in relation to the Catford area of Lewisham, we would be grateful if the Council could accept these late submissions and take them on board in preparing the Preferred Submission version of the plan. I would, of course, be happy to discuss any aspect of my clients representations further, if that would assist at this stage. I would be grateful if you could acknowledge safe receipt of these representations	Comments noted.	No change.

HHGL Ltd (G R Planning Consultancy Ltd obo)	- 3	General LSA SA 10	**EMERGING LEWISHAM LOCAL PLAN – HOMEBASE, BECKENHAM HILL ROAD, CATFORD** I refer to the consultation on the Main Issues & Preferred Approaches to the emerging Lewisham Local Plan (Draft Plan) which took place between 15 January 2021 and 11 April 2021. I act on behalf of HHGL Ltd, which trades as Homebase within the UK & Ireland. My clients are aware that the consultation period on the Draft Plan has now ended and apologise that we were not in a position to respond to the Draft Plan. Nevertheless, they have asked me to write to you to confirm their position in relation to their Homebase store on Beckenham Hill Road in Catford and to establish a point of contact, which will hopefully assist in future discussions between my clients and Planning Policy. As you may be aware, Homebase was sold by Wesfarmers to Hilco Capital Ltd (Hilco) in May 2018. This followed Wesfarmers attempts to rebrand the business 'Bunnings', a DIY format that they operated in Australia and New Zealand. The 'Bunnings' brand did not gain traction in the UK, prompting Wesfarmers to sell the business Hilco. Hilco purchased the business with the specific aim of investing in the Homebase brand and returning the business to its traditional roots. As part of that strategy Homebase streamlined its portfolio, returning unprofitable stores to their owners and downsizing larger stores that no longer met the requirements of the business. That strategy was implemented by a new management team and together with the current owners (Hilco), they have successfully turned around the fortunes of the national Homebase business. In February 2020 Homebase issued an update of this progress, announcing a return to profit well ahead of expectations (Source: Homebase press release 27 February 2020). It was an extraordinary turnaround bearing in mind the difficulties that the UK retail sector continues to experience and placed the business in a very good position not only to grow and expand further, but also to preserve the existing jobs that its Catford store supports, as well as the thousands of jobs that the business supports throughout the UK. That success has been based on its strong brand, the fact it remains one of the most recognisable retailers in the UK, the introduction of new ranges and concessions, continuing investment in its staff qualifications, knowledge and expertise, and its future commitment to ongoing investment in refurbishing and extending existing stores. Whilst Homebase stores were closed during the initial months of the first Covid 19 lockdown, following their reopening and in May/June 2020, sales at all UK Homebase stores grew by over 25% compared to the same two months in 2019. This performance has been reflected during the second lockdown and combined with Homebase's role as an 'essential retailer', it has placed the business in an extremely strong position to assist with the UK's economic recovery post Covid 19. The full implications of the Covid 19 pandemic on the UK economy will not be known for some time. Even so, it is apparent that some businesses will not	Comments regarding the leaseholders who want to remain trading are noted.	No change.

			survive. Within the retail sector, operators who were struggling before Covid 19 continue to fall into administration. The emergence of Covid 19 has, in our view, significantly increased the importance of supporting and retaining businesses like Homebase. In this respect, my clients have confirmed that their current lease on the Catford store extends to September 2025. The store is successful and profitable, with a loyal customer base and experienced staff. Homebase are firmly committed to retaining its representation on the site and will be seeking to renew their lease at the appropriate time.		
HHGL Ltd (G R Planning Consultancy Ltd obo)	- 3	General LSA SA 10	I would be grateful if you could acknowledge receipt of this letter and include our details on the Local Plan data base. I would, of course, be happy to discuss any aspect of the above further or provide any additional information on my client's position or their business requirements.	Comments noted.	No change,
LaSalle Investment Management (Savills obo)	- 3	General LSA SA 10	**LONDON BOROUGH OF LEWISHAM LOCAL PLAN REGULATION 18 STAGE CONSULTATION** **REPRESENTATIONS MADE ON BEHALF OF LASALLE INVESTMENT MANAGEMENT** **Introduction** We write on behalf of our client, LaSalle Investment Management ('**LSIM**'), in respect of its land interests in land at 10 Beckenham Hill Road in Catford. This letter is submitted to provide representations to the consultation on the London Borough of Lewisham Local Plan Regulation stage "Main Issues and Preferred Approaches' document. These representations are also made in the context of pre-application discussions undertaken with the Local Planning Authority ('**LPA**') in respect of LSIMs land ownership at 10 Beckenham Hill Road in Catford (the '**Site**'). The Site is previously developed land and currently comprises a Homebase store and associated car park. The emerging Local Plan identifies the Site as an allocation for residential-led mixed use development within Lewisham's South Area, under 'Site Ref: 10'. LSIM recognises the importance of the planning policy framework to help it and its partners realise their respective ambitions and look forward to working with the Council to develop an appropriate framework to create the certainty of outcome required to enable this key site to be brought forward for development with confidence. In summary, LSIM supports the aspirations of investment and growth within Lewisham and the identification of appropriate redevelopment to help meet the requirements of the existing and new population over the plan period.	Comments and support noted.	No change.
LaSalle Investment Management (Savills obo)	- 3	General LSA SA 10	**Site Details** As set out above, LSIM's land ownership comprises the purpose built Homebase retail warehouse located off Beckenham Hill Road/Bromley Road in Catford. The Site extends to circa 1.7 hectares and comprises previously developed land in the form of an existing retail store and associated car park. The principle vehicle	The supplementary information is noted.	No change.

			access and egress to the Site is via Beckenham Hill Road with an additional exit only on to Bromley Road. The existing Homebase store was constructed pursuant to planning permission for development of a '*single storey retail unit for the sale of non-food items with ancillary tea room, children's play area and garden centre and the provision of a minimum of 100 car parking spaces and service road'* granted at appeal on 16 July 1982 (LPA Reference: LE/472/C/TP). On 17 April 2019, planning permission was granted for the variation of Condition 6 (restriction on sale of food) of Application LE/472/C/TP in order to allow the sale of all goods falling within Class A1 (retail) (Ref: DC/18/108884). Land uses surrounding the Site are predominantly residential and range from traditional two storey semi-detached properties to the south and north-west, three storey flats to the south and north east and taller modern flatted developments of five to nine storeys located to the north. To the east of the Site on the opposite side of Bromley Road is St Johns Church (Grade II listed), a two storey community building known as the Green Man and a Fiat garage. To the rear of the Site is Catford Wanderers Sports Club. The Site has a PTAL Rating of 3 and therefore benefits from 'good' accessibility by a range of modes of public and sustainable modes of transport. There are no statutory listed buildings on or adjacent to the Site nor does it fall within or adjacent to a Conservation Area. The Environment Agency's flood risk map shows the majority of the site to be in Flood Zone 2 meaning that there is a medium probability of potential flooding.		
LaSalle Investment Management (Savills obo)	- 3	General LSA SA 10	**Representations to the Local Plan Regulation 18 Consultation** Below we provide our principal comments and/or amendments to the relevant parts and policies of the Local Plan to ensure that the Plan is legally compliant and sound having regard to its deliverability and application. We trust will be afforded appropriate weight in the consultation process. These representations have considered the emerging Local Plan in the context of the requirements established by the National Planning Policy Framework (February 2019) and London Plan 2021 (March 2021). **General Comments** The National Planning Policy Framework ('**NPPF**') requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. Local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change.	Comments noted.	No change.

			They should be consistent with the principles and policies of the NPPF, and should be aspirational but realistic to address spatial implication of economic, social and environmental dimensions. As the Local Plan emerges, it is important that it adheres to the requirements of the NPPF in positively promoting new development across the Local Plan area.		
LaSalle Investment Management (Savills obo)	- 3	General LSA SA 10	We trust that these formal representations will be afforded the appropriate weight by the LPA and assist in the formulation of the emerging Local Plan. We would also be grateful if you could acknowledge receipt of these representations and keep us updated of any further stages of consultation, so that we can provide comments as may be required. Should you require any clarification or additional information, please do not hesitate to contact us.	Comments noted.	No change.
LaSalle Investment Management (Savills obo)	3	LSA SA 10	LSIM would also confirm its **strong support** for the allocation of the Homebase / Argos site on Bromley Road in the medium to long term subject to: 1. The allocation not jeopardising its active asset management in the short to medium term; and 2. An increase in the residential quantum envisaged by the allocation which would be necessary to support the viable redevelopment of the retail floorspace given its high existing use value	Support noted. Our response is set out below.	No change.
LaSalle Investment Management (Savills obo)	3	LSA SA 10	***Site Allocations*** The Site is proposed as an allocation within 'Lewisham's South Area' for comprehensive residential-led mixed use redevelopment in the emerging Local Plan under 'Site ID: 10'. It is stated that the allocation has an indicative development capacity of 141 net residential units and 5,694 sq. m of gross non-residential floorspace. The draft allocation sets out that the intensification of the Site, along with the introduction of a wider range of uses, will provide a more optimal use of land. Furthermore, any proposals for redevelopment of the Site would need to accord with a series of and requirements and guidelines linked to delivery of new and improved public realm, green infrastructure and positive frontages. LSIM supports the principle of the emerging allocation of the Site for comprehensive redevelopment which can help to meet strategic objectives in terms of residential land supply, economic growth and employment generation within Catford in the mid to long term. LSIM does however have a number of comments in relation to the specific requirements of the Site Allocation, which are detailed further below. <u>Residential Yield</u> The Site Allocation is identified to deliver an indicative development capacity of 141 net residential units. Whilst LSIM acknowledges the capacity quoted is for indicative purposes, this should be increased such that it more accurately reflects the potential of the Site. The initial design concepts presented as part of the pre-application process have demonstrated that the capacity of the Site significantly exceeds the emerging allocation.	Support noted. The pre-application is likely to evolve prior to the submission of a planning application, and so cannot be relied upon to provide a design led capacity for this site. In these instances, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need to provide mixed use development by introducing residential units, retention of the pond and to reflect the surrounding character of	No change.

			The amount of non-residential floorspace should also be reduced. A residential led, mixed use scheme would not support such a substantial quantum of non-residential space. A lower quantum of non-residential floorspace can still contribute appropriately towards the wider aspirations for the A21 Corridor in terms of creating positive frontages along Bromley Road and Beckenham Hill. Critically, given the high existing use value of the existing retail uses, any revised development scheme will need to exceed the indicative residential capacity to realise the objective of comprehensive redevelopment of the Site. A lower density scheme in line with the indicative capacity would mean that the opportunities offered by the site cannot be realised during the Plan period. The effect of this would be to: 1. Reduce the housing supply generated by Site Allocations by 141 units which increases the demand placed on other, less suitable sites; and 2. Lose wider benefits linked to comprehensive redevelopment including the delivery of more appropriate, in terms of configuration and mix, commercial space and improved layout and public realm. On the basis that the Site has been specifically identified as suitable for residential uses, and the quantum of development required to facilitate a viable redevelopment would be significant, the indicative capacity should be increased to a minimum of **300 units**. This would be more consistent with the Plan's strategic focus of delivering housing land supply on previously developed and brownfield sites, the optimisation of housing delivery and a 'design led' approach as recently adopted by the London Plan2. The proposed intensification of the Site in this manner would help to meet the Borough's need for additional residential units in a preferred and sustainable location. It would also ensure that the delivery of a residential led development at the Site can make a significant contribution towards public amenity and accessibility (re-establishing connections with existing green spaces) as is envisaged by the allocation. As drafted, the emerging allocation fails to recognise the opportunity and true capacity of the Site and in that regard is unsound.	Southend Village. -Based on these considerations, the land use mix and residential units remain the same. Optimal capacity for the site will be established at planning application stage through a design led approach.	
LaSalle Investment Management (Savills obo)	3	LSA SA 10	<u>Proposed Land Uses</u> Whilst LSIM supports the proposed allocation of the Site for residential development and compatible main town centre, commercial and community uses, we consider that the Policy should include flexibility to support the retention of the existing retail uses without reference to such a prescriptive capacity figure. As stated above, a residential led, mixed use scheme would not support such a substantial quantum of non-residential space as that identified (5,694 sq. m) and the proposed allocation should reflect this position. A lower quantum of non-residential floorspace can still contribute appropriately towards the aspirations for the A21 Corridor in terms of creating ground floor activity.	Disagree that the non-residential floorspace figure should be excluded from the Local Pan. The Local Plan provides indicative site capacities. Optimal capacity for the site will be established at planning application stage through a design led approach. Agree that the redevelopment should not	Homebase/Argos site allocation amended to acknowledge that redevelopment will take place in the medium to long term.

			LSIM would request that the allocation policy be revised to remove a figure for gross non-residential floorspace but state that the delivery of main town centre uses as part of a residential led development is supported. Specifically, the inclusion of retail uses such as a foodstore within the allocation policy would help to meet shopping requirements locally and contribute to creating a sustainable, mixed use development by meeting the needs of a new residential community at the Site. This would also reflect the existing and established land uses at the Site and enable sufficient flexibility for the delivery of an appropriate mix and quantum of land uses. We would also stress that LSIM would only support the emerging site allocation on the basis that it does not impact on the effective management of the current, established retail floorspace. As set out above, the redevelopment of the floorspace is only anticipated in the medium to longer term and the owner must retain the ability to asset manage the floorspace in advance of any longer term redevelopment. This would ensure that the Plan is positively prepared and will make the most effective use of previously developed land. Furthermore, it would enable any future development scheme to respond appropriately to market forces in terms of what is a viable and deliverable. The above matters will ensure that the emerging Local Plan is appropriately formulated to ensure the future development of the Site can be delivered in an appropriate manner, whilst allowing for reasonable flexibility.	detrimentally impact on the operation of the current retail floorspace.	
LaSalle Investment Management (Savills obo)	3	LSA SA 10	**Summary and Conclusion** LSIM intends to be a long term stakeholder in Lewisham and hopes to play an active role in its regeneration across the plan period. LSIM strongly supports the overall principles of redevelopment and regeneration that are emerging within the Local Plan. It also reiterates its **strong support** for the allocation of the Homebase / Argos site on Bromley Road within the emerging Local Plan, subject to the detailed considerations as set out above. LSIM would request that the Council acknowledges the commercial considerations that are integral to the realisation of policies. In respect of the Site on Bromley Road, LSIM is aligned with the Council's aspiration to deliver comprehensive redevelopment of the site. However, for this objective to be realised, it will require a flexible approach in terms of densities and land uses. As set out above, such an approach is not discordant with local or national planning policy which both seek to optimise the potential of sustainable sites such as this.	Support and comments noted. The Local Plan provides indicative site capacities. Optimal capacity for the site will be established at planning application stage through a design led approach.	No change.
Phoenix Community Housing (BPTW obo)	3	LSA SA 10	We also wish to comment on specific site allocations as follows: 10 – Homebase, Bromley Road (South Lewisham)– PCH supports the allocation of this site for mixed-use development, including a significant quantum of genuinely affordable housing, though consider that the allocation as currently drafted does not sufficiently promote the heritage value of the site; particularly the grandiosity of its front façade and water feature.	Support is noted. Disagree as the site allocation seeks to improve public realm and open space, including retention of the pond and	No change.

				enhance green infrastructure, including SINC, urban green space and public open space. The pond (designated SINC) in the eastern corner of the site, should form a key feature of the development and its biodiversity value should be enhanced. The front façade is not a designated heritage asset and the site may benefit from a full redevelopment of the site and reconfiguration of existing buildings.	
Tavern Propco (Savills obo)	- 3	General LSA SA 11	**Representations to the Lewisham Local Plan Regulation 18 (Main Issues and Preferred Approaches Document) Consultation** **Lewisham's South Area Site Allocation 11: Downham Co-op** These representations are submitted by Savills on behalf of our client, Tavern Propco, in response to the London Borough of Lewisham's (LBL) Local Plan Main Issues and Preferred Approaches (Regulation 18) consultation. These representations supports the principle of the proposed Lewisham South Area Site Allocation 11: "Downham Co-op" (the Downham Co-op site allocation) for residential and town centre use of the site. Whilst supporting the principle of the allocation, this representation requests that the suggested use in the proposed allocation is maximised so that the development potential of the sustainably located site is utilised to deliver housing and viable town centre uses within Lewisham's New Local Plan. **Tavern Propco** Tavern Propco is the owner of The Downham Tavern which is located within the boundary of the proposed Lewisham South Area Site Allocation 11: "Downham Co-op". **Executive Summary** Tavern Propco is overall supportive of the Lewisham Local Plan Regulation 18 stage "Main Issues and Preferred Approaches" and its direction of travel, subject to modifications which Tavern Propco request to ensure the Local Plan and proposed Downham Co-op site allocation best maximises the development potential of the site. **Structure of this Representation** This representation provides a brief overview of the site and current and emerging policy designations. It request amendments are made to specified emerging policies.	Support and comments noted.	No change.

Tavern Propco (Savills obo)	- 3	General LSA SA 11	**The Site** The site is approximately 0.43 hectares in size. It is located west of Downham Way, north of Moorside Road and south of Capstone Road, in Bromley within south Lewisham. It currently comprises one single storey retail unit (Co-op Food) to the west of the site, one two-storey public house (Downham Tavern) to the north east of the site and a car park that occupies the central area of the site. Access is taken via Moorside Road along the southern boundary of the site. The site is very well located within the existing Downham Way local centre and surrounded by a mix of residential, retail and community uses. The surrounding properties are predominantly two storeys in height, with some three storey residential buildings interspersed. These include post-war terrace houses along Moorside Road (to the south) and Capstone Road (to the north) and a parade of retail units along Downham Way (to the east). Along Moorside Road there is also a medical practice and leisure centre and a primary school. The site is very sustainably located and is considered very suitable for mixed-use residential-led development. The majority of the site has a PTAL rating of 3 whilst the very southern boundary of the site along Moorside Road has a PTAL rating of 2. TfL's WebCAT mapping indicates that the majority of the site will have a PTAL rating of 4 in the 2021 and 2031 forecast baseline for. This demonstrates that the site has very good access levels to public transport supporting it as a location for increased density of development and a suitable location for new housing and intensification of town centre uses.	The supplementary information is noted.	No change.
Tavern Propco (Savills obo)	- 3	General LSA SA 11	**Existing Planning Policy Designations** The site currently has three policy designations; Core Strategy Policy 6: *Retail Hierarchy and Location of Retail Development* and Development Management Policy 14: *District Centres Shopping Frontages* and Development Management Policy 20: *Public Houses*. Core Strategy Policy 6 seeks to only allow redevelopment of local shopping facilities where there is no economic demand for such services. Development Management Policy 14 states that the Council will only consider a change of use involving the loss of ground floor level shops where the proposal would meet specified criteria. Development Management Policy 20 seeks retain public houses unless they are financially unviable, vacant and there is other local provision. **Requested Amendment:** It is requested that the current planning policy designations are removed and that the Downham Co-op site is allocated for mixed use residential-led development as set out in the site's proposes allocation, subject to modifications.	Policies in the Local Plan, once adopted, will replace the policies in the Core Strategy and Development Management Local Plan. However, the site allocation will still require the retention or re-provision of the public house, alongside mixed-use redevelopment.	No change.
Tavern Propco (Savills obo)	3	LSA SA 11	**Emerging Planning Framework** **Lewisham Local Plan Regulation 18 (Main Issues and Preferred Approaches Document)** **Lewisham's South Area Site Allocation 11: Downham Co-op** Tavern Propco supports in principle the Downham Co-op site to be allocated for mixed-use development in Lewisham's the new Local Plan.	Support noted. Where no advanced pre-application discussions have taken place, the council has used a SHLAA based method to determine indicative site capacities – more details	No change.

			The proposed site allocation is for a mixed-use redevelopment with compatible main town centre and residential uses. An indicative development capacity of 42 residential units and 1,440sqm of gross internal non-residential floorspace compatible with town centre uses. **Residential Use at Lewisham's South Area Site Allocation 11: Downham Co-op** Tavern Propco strongly support the provision of residential development within the site allocation. However, it is considered that the proposed indicative development capacity of 42 units is conservative and does not best maximise the development potential of the site. In the context of making effective use of land, Paragraph 117 of the NPPF states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. Paragraph 118 goes on to state that planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed-use schemes, and should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. Paragraph 118 goes on to set out that planning policies should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. In keeping with the principles of the NPPF, Lewisham's Local Plan should be seeking to make effective use of suitable land, such as the Downham Co-op site, to boost housing supply. Lewisham's South Area Site Allocation 11 comprised land that is a previously developed brownfield site in a highly accessible and sustainable location close to a wide range of existing services, facilities and amenities. Therefore, it is considered that the site's indicative development capacity of 42 residential units does not fully utilise the development potential of the site. It is considered that a development capacity of 42 dwellings should be set as a minimum target and should be exceeded if all other planning considerations have been met, in accordance with national, London-wide and local aspirations. **Requested Amendment:** It is requested that the Downham Co-op site allocation is amended to state that the net residential units that development at the site should provide is "a minimum of 42 units subject to satisfactory design".	can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need to re-provide retail uses and the public house, whilst introducing residential units and to reflect the surrounding character of the site. Based on these considerations, the land use mix and residential units have remained the same. Optimal capacity for the site will be established at planning application stage through a design led approach.	
Tavern Propco (Savills obo)	- 3	General LSA SA 11	**Summary and Conclusions** Tavern Propco is supportive in principle of the Lewisham's South Area "Site Allocation 11: Downham Co-op" to be allocated for mixed-use residential-led development in Lewisham's New Local Plan. It is requested that LBL amend Lewisham's South Area Site Allocation 11: *Downham Co-op* to maximise the potential development capacity of the site. It is requested that the indicative net capacity of 42 residential units is set as a minimum target. With regards to proposed policies, it is requested that LBL amend Emerging Policy HO1: *Meeting Lewisham's Housing Needs* to include the Standard	Support and comments noted. Our response is set out above.	No change.

			Methodology Housing targets and that Emerging Policy EC19: *Public Houses* is amended to better represent prevailing market conditions and to ensure that planning policies allow the optimum use of land over the Plan's period. We would be grateful for confirmation of receipt of these representations. Please feel free to contact us in the first instance if you have any queries or would like to discuss.		
McDonald's Restaurants Ltd (Planware ltd obo)	3	LSA SA 13	**McDonald's Restaurant, Old Bromley Road, Downham, Bromley, BR1 4JY** Please take this letter as a formal objection to the proposed Local Plan Allocation 13, McDonald's Ashgrove Road which seeks to allocate the site for mixed use development. We currently have no desire to redevelop this site and would not want to prejudice the provision of our drive-thru lane in this location. Whilst we acknowledge your aspirations for the wider area we would welcome the opportunity to meet with you to discuss the retention of our store. I look forward to hearing from you.	The objection to developing this site is noted.	McDonalds Ashgrove Road ste allocation has been removed from the Plan.
The Cherwell Group (DP9 obo)	- 3	General LSA SA 14	**REPRESENTATIONS TO THE LEWISHAM LOCAL PLAN** We write on behalf of The Cherwell Group who are the owners of Catford Police Station and are shortly to begin pre-application engagement with the Council on plans for the site.	Comments noted.	No change.
The Cherwell Group (DP9 obo)	3	LSA SA 14	The site is included as a site allocation in the draft Local Plan and we fully support this approach.	Support noted.	No change.
The Cherwell Group (DP9 obo)	3	LSA SA 14	We note that indicative development capacities have been included for the site. We consider that the evidence base is the appropriate location for the indicative capacities, and that they have the potential to be misinterpreted or misapplied as design briefs or effective constraints on what can be achieved on the site. There is the possibility to further optimise the development capacity of the site and without appropriate text we are concerned that the indicative development capacities could be used to constrain development potential.	Support noted. Where no advanced pre-application discussions have taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper. Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need to protect the on-site designated heritage asset and to reflect the surrounding character. The indicative capacity has also been tested through the	Catford Police Station site allocation amended by reducing residential capacity to 24 units and increasing employment/ main town centre floorspace to 1,072m^2.

				A21 Development Framework that has been endorsed by the council. -Based on these considerations, the land use mix and residential units have been amended. Optimal capacity for the site will be established at planning application stage through a design led approach.	
Phoenix Community Housing (BPTW obo)	3	LSA SA 14	14 - Catford Police Station (South Lewisham) - PCH sees the potential for this site to make a significant contribution to genuinely affordable housing in Catford town centre, and so supports its allocation, however would strongly urge that the retention, adaptation and conversion of the front building be a requirement of the policy given its status as a locally important heritage asset and the most architecturally profound building in the vicinity. We would also point out that this site falls within the Central Area rather than South Lewisham.	The site allocation recognises the heritage value by stating that opportunities should be taken to investigate the viability for the adaptive re-use of the existing buildings which are non-designated heritage asset. There is also merit in referring to the adjacent locally listed Army Reserves. Disagree, as Catford Police Station site allocation is located in the South sub area.	Catford Police Station site allocation amended to reference nearby locally listed heritage asset.
Notting Hill Genesis (Savills obo)	3	LWA 01	*Relates to Call for site* Whilst NHG is generally supportive of the overall 'direction of travel' of the West Area place principles (LWA1), specifically Part A(e), which sets out that the Council will deliver new and improved workspace through colocation of employment and other compatible uses, the draft Local Plan is **not consistent** with national policy and the London Plan.	Comments noted. Disagree that the Local Plan is inconsistent with national and London Plan policy.	No change.
Selkent Holdings (Daniel Watney LLP)	3	LWA 01	*Relates to Part 3, LWA SA 09* **Draft Policy LWA1 – West Area** We welcome the recognition in Policy LWA1(D) that "*the comprehensive redevelopment of sites within Willow Way LSIS will be supported to enhance local employment provision as well as to improve the environmental and visual quality of the neighbourhood area. Development proposals within the LSIS should positively address the site's relationship with Upper Sydenham / Kirkdale local centre, particularly to ensure compatible land-uses as well as safe and legible connections. Development should deliver high quality designs that help to establish a more cohesive, employment-led mixed use quarter.*"	Support noted.	No change.

			This recognition that Willow Way could be a vibrant, mixed-use quarter which will positively improve the Upper Sydenham / Kirkdale local centre is exciting and strongly supported. We agree that with appropriately designed schemes, there is an excellent opportunity to create a meaningful employment hub at Willow Way and also deliver significant amounts of residential accommodation, including affordable homes, and public realm.		
(Simply planning obo)	- 3	General LWA SA 01	**London Borough of Lewisham – Regulation 18 Lewisham Local Plan Public Consultation** **MOT Centre, Shardeloes Road, Brockley, SE14 6RT** **Representations on behalf Mr Kadir Gencel and Mrs Kutlu Gencel** These Representations are submitted on behalf of the owner of the MOT Centre, Shardeloes Road, Brockley ('the site') to the public consultation on the regulation 18 version of the draft Lewisham Local Plan. Our clients site forms part of site allocation reference SA30 *'Site at 111 & 115 Endwell Road (Timber Yard and Community College), Brockley Cross'* in the currently adopted Lewisham Site Allocations Local Plan (June 2013). The existing allocation in the currently adopted location plan states the allocation should be used for the following: *"Mixed use commercial/employment uses on the ground floor with housing above"* *LB Lewisham officer note: two maps are included in the original representation, both showing the boundary of the site in red and the clients land in green.*	Comments noted.	No change.
(Simply planning obo)	- 3	General LWA SA 01	The above allocation is currently in multiple ownerships with the land to the south and west of our clients land being owned by the adjoining timber merchants. The land to the north of the site is occupied by a single storey church building, with a small area of the timber merchants beyond this. The allocation in the current Local Plan states that *"The Church itself is not proposed for redevelopment"* and so is clear that the allocation relates to our clients land and the timber merchants land only. On 19th March 2019 our client applied for planning permission on the site under application reference DC/19/110715 for the following development: *"Demolition of the existing single storey buildings on the site at R L Watson and Son, Shardeloes Rd, SE4 and construction of a part one/part two storey building to provide an MOT Centre facilities"* Planning permission was granted for the above development on 15th May 2019 and development has commenced at the site. Following the granting of planning permission it is our client's intention to seek a further planning permission for additional storeys to be added to the MOT Centre to provide residential units above. We are in the process of preparing a pre-application enquiry to be submitted to the London Borough of Lewisham to seek your advice ahead of the submission of the planning application.	Comments noted.	No change.

(Simply planning obo)	- 3	General LWA SA 01	We would welcome and opportunity to discuss the allocation and will be progressing a pre-application enquiry for residential development at the site imminently, which we hope will assist in demonstrating to the Planning Inspectorate that the retained allocation remains viable and deliverable during the next plan period.	Comments noted.	No change.
(Simply planning obo)	3	LWA SA 01	In the regulation 18 version of the draft Lewisham Local Plan, the existing 111 & 115 Endwell Road allocation is proposed to be retained as part of the new Local Plan, including our clients land. The wording for the allocation in the draft Local Plan has been amended slightly to the following: *"Employment led mixed-use redevelopment with compatible commercial, community and residential uses."* We welcome the wording for this allocation, as it continues to fit with our aspirations for residential development on the upper floors above the MOT Centre. The exact yield for the number of units will be determined during pre-application engagement with the Local Planning Authority.	Support noted.	No change.
(Simply planning obo)	3	LWA SA 01	Having reviewed the detailed wording for the allocation on pages 754 to 755 of the Local Plan, we would suggest a couple of minor alterations to the allocation. The first relates to the development guidelines on page 755 and we would suggest a fifth bullet point is added to state the following: *"Given the multiple ownerships of the site, a phased development of the allocation would be acceptable. Any earlier phase of development must show compliance with Policy QD1 'Delivering high quality design in Lewisham' and also demonstrate how it would not prejudice the delivery of the wider site allocation"* Paragraph 59 of the NPPF confirms the government's objective of significantly boosting the supply of new homes. Our client site can provide a small increase to the housing land supply and this can be delivered immediately in a way which will not undermine the wider site allocation. Therefore, the allocation should provide clarity that a phased development of the allocation would be permitted, to allow the early delivery of housing on our clients land. In conclusion, our clients are very keen to redevelop their land to provide additional residential units above, which complies with the current and draft Site Allocation Plan. Therefore, we are keen to support the revised Local Plan but would request an addition to the wording of the allocation to allow the early delivery of housing at our clients site, on the basis that this will not prejudice the wider allocation of the land to the west and south.	Disagree with wording proposed but recognise that masterplanning, phasing and working in partnership should be acknowledged.	111-115 Endwell Road site allocation amended to reference masterplanning and partnership working.
(Simply planning obo)	3	LWA SA 01	A second suggested amendment is that the site allocation boundary should be amended. The wording of the current allocation makes clear that the church to the north of our site is not intended for development. Unless the church have advised that they wish for the site to be redeveloped, then the allocation should be amended to ensure the whole allocation is considered to be deliverable, meaning the church site is deleted from the allocation. *LB Lewisham officer note: a map is included in the original representation showing a suggested boundary revision marked by an orange line.* The above revised allocation would retain the land in the ownership of our client and the timber merchants, which must be considered the only deliverable	Agree that the church plot should be removed from the site allocation.	111-115 Endwell Road site allocation amended by removing the church plot from the site allocation boundary.

			allocation if the Church have never advised the Council that they wish to redevelop their land. We would also suggest that the boundary of the site allocation be amended to ensure the land included within the allocation can be considered as deliverable, as required by paragraph 67 of the NPPF.		
M&D Enterprises Ltd (March Design Associates obo)	- 3	General LWA SA 02	I was passed on your consultation document on site review, attached and instructed to respond on behalf of the owners M&D Enterprises Ltd for whom we have acted for over many years.	Comments noted.	No change.
M&D Enterprises Ltd (March Design Associates obo)	- 3	General LWA SA 02	We therefore hope this will be taken into account in your final Local Plan draft and hopefully adopted version in due course. As is said in these parts, you know it makes sense. The owners are always happy to discuss and if a wholly residential scheme is acceptable, then the prospects of this site coming to fruition in the near future is highly probable.	Comments noted.	No change.
M&D Enterprises Ltd (March Design Associates obo)	3	LWA SA 02	This site was allocated as SA28 in previous Local Plan and owners wish for it to remain as a possible development opportunity. In the interim period efforts were made to secure planning permission, which was thwarted by your Design Panel at a time of transition from the previous voluntary panel to the new 'paid' panel and this site got up in the cross fire and in my opinion unreasonably so. The adjacent site to the north had been redeveloped, whilst the one to the south was about to commence, both of incredible mediocrity and yet the latter was cited as exemplar standard, when built it is very bland. Consequently the scheme was mothballed but may be reconsidered soon but could be enhance if a pragmatic designation is applied.	Comments noted.	No change.
M&D Enterprises Ltd (March Design Associates obo)	3	LWA SA 02	The new London Plan emphasises 'Design Led Approach' and this site meets the small sites category where PTAL is no longer a consideration. Furthermore this has been a skip-yard for many years, and now only used for plant storage. There was a temporary permission for a housing office for local framework delivery, that has long since ceased and reverted to mainly skip storage. Given the demise of commercial ground floor space, particularly since Covid, where secondary retail space will in even less demand, then insistence for a non-residential use on ground floor should be removed and the site go forward as a wholly residential scheme. The retention of a ground floor non-residential use is a liability which prevents redevelopment and if retained is likely to remain as a voided shell like many others in the locality. The Policy consideration needs to waken up to this reality for secondary parades – in this case with low and incompatible commercial use with virtually zero employment status – to free up scope for better and more residential use in highly sustainable locations such as this right on the station with good bus routes nearby.	Disagree that commercial uses should be dropped from the site, given it's location within the local centre and proximity to the railway station Other developments on both sides of the station have operational ground floor non residential uses.	No change.
M&D Enterprises Ltd (March Design Associates obo)	3	LWA SA 02	Owners are happy to include level access to platform as a community / infrastructure benefit with good public realm landscaping. This inclusion should be considered as a requisite gesture to benefit all especially disabled people and therefore other commercial aspects to be dropped in favour of good cycle, refuse and ground floor circulation / entrances as way forward.	Agree that access to the platform will be of benefit. The site allocation already includes the need to improve legibility and safe access to the station entrance from the western	No change.

				side of the railway. Disagree that commercial uses should be dropped from the site.	
Dolphin Living Group (CMA Planning obo)	- 3	General LWA SA 04	**LEWISHAM DRAFT LOCAL PLAN – REGULATION 18 STAGE, JANUARY 2021 REPRESENTATIONS ON BEHALF OF DOLPHIN LIVING GROUP IN RESPECT OF 'MAIN ISSUES AND PREFERRED APPROACHES' DOCUMENT** We write on behalf of Dolphin Living Group in response to the local planning authority's draft Local Plan, which was published on 15th January 2021 for consultation pursuant to Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.	Comments noted. Our response is set out below.	No change.
Dolphin Living Group (CMA Planning obo)	- 3	General LWA SA 04	Dolphin Living have land interests within the London Borough of Lewisham, in particular a site on Honor Oak Road in Forest Hill, which forms part of "West Area Site Allocation No.4" within the draft Local Plan. Dolphin support the principle of the site being allocated for housing; however, for the reasons set out below, we consider that the draft allocation fails to properly reflect the site's development opportunities such that the indicative development capacity in the Plan should be significantly increased.	Comments noted. Our response is set out below.	No change.
Dolphin Living Group (CMA Planning obo)	- 3	General LWA SA 04	We hope that these representations will provide a useful contribution to policy formation and would welcome further dialogue with the Council on this matter as drafting of the new Local Plan progresses, so as to ensure that the Site Allocation promotes rather than restrains the delivery of new homes on this key site.	Comments noted. Our response is set out below.	No change.
Dolphin Living Group (CMA Planning obo)	- 3	General LWA SA 04	**Dolphin Living** Dolphin Living is an affordable housing charity formed in 2005 and initially funded through gifts from the Dolphin Square Trust from the sale of Dolphin Square in Pimlico. Dolphin Living's primary charitable objective is to support London's workers on modest incomes who cannot afford housing near to their place of work. This is fulfilled through the provision of homes to rent at below market levels. In 2021 79% of their 799 homes were available for intermediate rent at an average discount of 40% to the local market rent. Dolphin Living house those who make London work and with whom London is better place to live and work. **The Site** In 2016 Dolphin Living acquired the site known as Havelock House and The Hermitage, Honor Oak Road, Forest Hill, London, SE23 3SA. The site is made up of two distinct elements; the first element is Havelock House, which comprises 2 x 4 storey and 1 x 3 storey blocks of flats that sit within landscaped grounds; the second element is 5 x 2 storey, 2 bedroom houses on The Hermitage, which lie immediately to the rear (north-west) of Havelock House. The Havelock House buildings are set back from Honor Oak Road this element of the site is bounded by the side of the 2 storey semi-detached house at 46 Honor Oak Road and the rear of the 2 storey detached houses at 1 and 3 Horniman Drive to the north; by an area of open grassland and the 2 storey houses on The Hermitage to the west; by the 4 storey block of flats with rear car park at 60 Honor Oak Road to the south, and; by the public highway on Honor Oak Road to the east.	The supplementary information is noted. Our response is set out below.	No change.

			The Hermitage element of the site is bounded by an area of grassland and shrubbery to the rear of the 3 storey block of flats known as Baxter House, Horniman Drive, and a telecommunications mast an ancillary building to the north and west; by the detached 2 storey house at 4 The Hermitage to the south, and; by the Havelock House buildings and grounds to the east. In terms of the local topography, the site sits on a slope, which rises from Honor Oak Road to Havelock House to The Hermitage. *LB Lewisham officer note: Figure 1.1 Aerial Photograph of the Site is included in the original representation. The photograph shows the site boundary in red.* The surrounding area is residential in character, comprising 2 to 3 storey semi-detached and terraced houses, 2 storey detached houses and 3 to 4 storey blocks of flats. The quality of the building stock in the area is varied, with many of the detached and semi-detached houses dating from the mid-twentieth century, although a number of attractive Victorian villas survive within the area, together with a handful of Georgian buildings. Whilst most of the purpose-built flatted blocks appear to date from the 1950-60s, there are some examples of more recent development, including small blocks of flats that appear to date from the 1990s and early 2000s. In terms of local amenities, the site lies approximately 400 metres to the north-west of the Forest Hill District Centre, which includes a range of local shops, cafes and restaurants and a large Sainsbury's supermarket. The site also lies 110m metres to the east of the Horniman Primary School. Whilst the site itself is not located within a Conservation Area, the boundary of the Forest Hill Conservation Area lies a short distance to both the east and south of the site. The detached 2 storey Regency villa with raised basement known as Asherby Cottage, 62 Honor Oak Road, and adjacent two storey Georgian house known as Hill House, 64 Honor Oak Road, which lie immediately to the south of the site, are both Grade II listed. Both buildings are treated as a group for the purpose of the listing and both lie within the Forest Hill Conservation Area. The Historic England listing descriptions for both buildings have been appended to this note. In terms of local access to public transport, the site lies 500 metres to the north-west of Forest Hill Station, which is served by both National Rail and London Overground services. In addition, London bus services operate along Honor Oak Road, with a bus stop located immediately adjacent to the south-east corner of the site that is served by the P4 bus route, which runs between Lewisham town centre and Brixton. As a result the site has a good Public Transport Accessibility Level (PTAL) of 3-4, on a scale from 0 to 6b where 0 is very poor and 6b is excellent.		
Dolphin Living Group (CMA Planning obo)	3	LWA SA 04	**Lewisham Draft Local Plan** The Lewisham Draft Local Plan 'Main Issues and Preferred Approaches' document was published for consultation in January 2021, pursuant to Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Part Three of the draft Local Plan sets out emerging policies and Site Allocations for each of Lewisham's key 'Areas'.	Comments are noted.	Havelock House, Telecom Site and Willow Tree House site allocation has been removed from the Plan.

			The Havelock House and The Hermitage site lies within Lewisham's West Area and forms part of draft Site Allocation No.4 'Havelock House, Telecom Site and Willow Tree House, near Horniman Drive', which allocates the site for 'redevelopment of backland site for residential use.' Draft Site Allocation No.4 provides an indicative development capacity of 30 net (i.e. additional) residential units. The Site Allocation area presently includes 23 residential units, all of which are within the Havelock House and The Hermitage site, and the total indicative site capacity (i.e. existing plus net additional) is therefore 53 homes. The Site Allocation covers an area of 1.48 hectares (ha) and the 53 home capacity equates to a density of approximately 36 units per hectare (u/ha). The previous version of the London Plan (2016) included a Sustainable Residential Quality (SRQ) Matrix that set out target density ranges for development with different settings and different Public Transport Accessibility Levels (PTALs). The SRQ Matrix was a relatively crude tool that was designed to support the delivery of new homes in order to meet the previous London Plan (2016) housing targets. As set out below, the new London Plan (2021) sets out higher housing targets, which reflect the pressing need to intensify and densify new housing developments in sustainable and accessible locations in order to meet London's housing needs. To support the delivery of these new, higher housing targets, the SRQ Matrix has effectively been replaced by London Plan Policy D3, which seeks to optimise site capacity through a design-led approach. Whilst the SRQ Matrix no longer has any weight in policy terms, it remains a useful yardstick for density calculations. In this regard it is relevant to note that the SRQ Matrix provides an indicative density range of 45-170u/ha for sites with an 'Urban' setting with a PTAL of 2-3, such as Havelock House and The Hermitage. Whilst not determinative in and of itself, the SRQ Matrix nonetheless provides a clear indication that the indicative development capacity for Site Allocation No.4 (which equates to 36u/ha (gross)) would amount to under-development of a sustainable and accessible brownfield urban site. The Lewisham Local Plan Site Allocations Background Paper (January 2021), which forms part of the evidence base for the draft Local Plan, sets out how the indicative site capacities have been calculated at Section 6 of the document. Subsection 4 ('all other sites') states that for sites where there is no existing planning consent, current pre-application proposals, or masterplan study, the starting point for establishing the indicative capacity has been informed by the use of a standard methodology, based on the density assumptions used in the London-wide SHLAA (2017) methodology. Table 6.1 in the document sets out the London-wide SHLAA density assumptions, which for 'Urban' sites with a PTAL of 2-3 (such as Havelock House and The Hermitage) provides an indicative density of 170u/ha. This broadly tallies with the SRQ Matrix referred to above, which suggests a target density range of 45-		

			170u/ha for sites with these characteristics, which would equate to between 67 and 252 dwellings for the allocation as a whole. Subsections 5 to 7 of the document go on to explain that sites considered under (4) were then subject to a sense-check exercise to assess whether the baseline capacity figures were feasible and appropriate to the site context. It appears that this sense-check exercise has resulted in the indicative capacity of Site Allocation No.4 being reduced from 170u/ha to 36u/ha, which is a 79% reduction. As with almost all urban brownfield sites, the Havelock House and The Hermitage site is subject to a number of development constraints, including proximity to neighbouring residential properties, mature trees within the site, site topography, prevailing building heights, and two nearby listed buildings. However, such constraints are common both within London generally and within Lewisham and it is not considered that these constraints are prejudicial to the extent that they would result in a 79% reduction in the indicative site capacity from that provided by the SHLAA density assumptions. Accordingly, Dolphin Living have commissioned Corstorphine + Wright Architects to prepare a development feasibility study for the Havelock House and The Hermitage site. *LB Lewisham officer note: A Site Analysis and Development Feasibility Study is included in the original representation.* The study includes contextual analysis of the site and its surroundings and sets out the site-specific development opportunities and constraints at Sections 2.3 and 2.4. The study then provides an illustrative masterplan for the site, which directly responds to the site's local context, opportunities and constraints, and demonstrates that the Havelock House and The Hermitage site (i.e. part of the overall allocation) is capable of accommodating approximately 110 homes within a contextually appropriate development scheme. We would ask that the Council takes into account the findings of the study as the drafting of the Local Plan progresses and would welcome further dialogue with the Council on matters pertaining to the development capacity for Site Allocation No.4.		
Dolphin Living Group (CMA Planning obo)	3	LWA SA 04	**Wider Policy Context** The pressing requirement to deliver new homes in order to meet housing needs is enshrined in all levels of planning policy. At a national level, Paragraph 59 of the National Planning Policy Framework (NPPF) states: *"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."* At a regional level, London Plan Policy H1 (Increasing Housing Supply), Part A, advises that each local authority should plan in order to meet and exceed its ten	The site allocations in the Local Plan when combined together seek to meet the London Plan housing annual target of 1,667 homes.	No change.

			year housing completions targets. These targets are set out in Table 4.1, which for Lewisham is 16,670 new homes over a ten year period, which equates to an annual target of 1,667 homes. This represents a 20% increase on the borough's previous London Plan (2016) annual target of 1,385 new homes. The Borough's most recently published Annual Monitoring Report (2019/2020) shows a projected five year housing supply of 7,359 homes for years 1-5 (which equates to an average annual supply of 1,472 homes), with supply then falling in years 5-10 and 11-15. This presents a significant challenge for the Borough as projected housing supply is markedly below the Borough's new London Plan housing target. It is therefore imperative that the Borough, through the plan making process, facilities an increase housing delivery through identifying and allocating suitable sites for new housing at appropriately optimised capacities/densities. London Plan Policy H1, Part B goes on to state that in order to ensure that the ten year housing targets are achieved, boroughs should, *inter alia*, optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary. This is of particular relevance as Havelock House and The Hermitage has a PTAL of 3-4 and is located just 400m from Forest Hill District Centre and 500m from Forest Hill Station. As such, there is a strong policy presumption in favour of optimising housing delivery on this sustainable and accessible brownfield site. Taking into account the above NPPF and London Plan policy objectives and requirements, it is clear that there is an urgent need for the Council, through the preparation of its new Local Plan, to support and promote the optimisation of housing delivery on sustainable, accessible brownfield sites, such as Site Allocation No.4, in order to meet its housing targets. As currently drafted, the indicative site capacity would serve to constrain housing delivery and must be increased to reflect the development potential of the site and to align with national and regional policy.		
Dolphin Living Group (CMA Planning obo)	3	LWA SA 04	**GLA Draft Good Quality Homes for All Londoners Guidance** In October 2020 the Mayor of London published his Good Quality Homes for All Londoners Guidance for consultation. This Guidance document has been prepared by the GLA with input from a team of specialist consultancies, including CMA Planning. It is anticipated that the final Guidance will be formally published as Supplementary Planning Guidance (SPG) to the new London Plan in Summer 2021, to replace the current (i.e. 2016) Housing SPG. The draft guidance can be downloaded from the GLA's website at: https://consult.london.gov.uk/good-quality-homes-for-all-londoners The draft Guidance includes four 'Modules', the first of which is Module A, which provides guidance in relation to meeting the over-arching objectives and policy requirements of London Plan (2021) Policy D3 (Optimising Site Capacity through the Design-led Approach). Specifically, Module A advocates a design-led	Comments relating to the Good Quality Homes SPD and the feasibility study are noted.	No change.

			methodology for optimising site capacity at the plan-making stage. It is aimed at borough policy officers when calculating capacity on strategic and non-strategic site allocations. It sets out an approach to assessing sites' suitability for development and offers a tool for assessing site capacity, which is provided within Module A. The enclosed feasibility study has been prepared with reference to the guidance provided in Module A and the accompanying Site Analysis Using Capacity Factors document sets out the capacity factors that have informed the indicative masterplan scheme. We would ask that the Council takes the GLA draft Guidance into account when preparing the Regulation 19 version of the draft Local Plan.		
Dolphin Living Group (CMA Planning obo)	3	LWA SA 04	In conclusion, it is considered that the draft Local Plan as currently worded would unnecessarily limit the delivery of new homes within a Site Allocation for new housing. Accordingly, Dolphin Living **object** to the current drafting of Site Allocation No.4 'Havelock House, Telecom Site and Willow Tree House, near Horniman Drive' and would ask that the Council increases the indicative development capacity for this key site in order to more closely reflect the site's development potential, and to more closely align with national and regional policy, which seek to significantly increase housing delivery.	Objection noted. Our response is set out above.	No change.
UD Urban Development	3	LWA SA 05	We apologies for the delay in submitting our documentation. Events related to the current health crisis caused serious disruption at the last moment. *LB Lewisham officer note: The following documents were also attached, alongside this representation:* *Site Location Plan* *Site Location Masterplan* *9-13 The Façade, Forest Hill Masterplan* *Correspondence relating to pre-app advice for 9-13 The Façade* *Proposed Floorplans, sections and elevations of 9-13 The Façade* Our Proposed Site address is: • 9-13 The Facade (and associated masterplan properties) Forest Hill London SE23 3HA We propose that the above site masterplan proposals, which encompass a large part of Lewisham's Reg. 18 (Forest Hill Station & Forecourt) be included within your local plan. The masterplan proposals illustrate how Lewisham's ambitions for a redeveloped Station area can be realised without the need for compulsory purchase. The plans demonstrate how each site can be developed independently without compromising the integrity of the overall scheme. Also included are proposals for 9-13 The Facade, which forms the western-most piece of the masterplan site. They are included to demonstrate the deliverability of a part of the overall scheme.	. The masterplan proposals and supplementary information relating to 9-13 The Façade is noted.	Land at Forest Hill Station West site allocations amended by making reference to masterplanning and landowners working in partnership.

Selkent Holdings (Daniel Watney LLP)	- 3	General LWA SA 09	**LB Lewisham Local Plan – Regulation 18 Version** **Written Representation, Selkent Holdings** This letter of representation has been prepared on behalf of our client, Selkent Holdings, in response to the Regulation 18 draft version of the LB Lewisham Local Plan issued for consultation earlier this year. Our client is a private landowner within the Borough, owning the site known as 12-24 Willow Way, SE26. These representations set out our support for the general emerging policy position in respect of land use and the site allocation encompassing our client's site, however does highlight some concerns with the Regulation 18 version of the Plan as currently drafted.	Support and comments noted. Our response is set out below.	No change.
Selkent Holdings (Daniel Watney LLP)	- 3	General LWA SA 09	We do however raise some concerns about the specifics of the site allocation and the impact this could have on our client's land ownership and aspirations for redevelopment. We request that these elements are reviewed through the next draft of the Plan to retain sufficient flexibility within the allocation and allow the site capacity to be optimised. **Site Description and Summary** Our client owns the freehold of a two-storey commercial building at 12-24 Willow Way, SE26 which forms part of the wider commercial site known as Willow Way. The site is currently designated as a Local Employment Location within LBL's adopted policy documents, with emerging policy seeking to re-designate this as a Locally Significant Industrial Site (LSIS). *LB Lewisham officer note: the Allocation Map is included in the original representation. It is reproduced with outline in red, and the client's site edged crudely in blue for context.* The site lies to the immediate north / north-east of a cleared parcel of land owned by LB Lewisham and to the immediate south of privately owned land comprising a small industrial unit, an MOT garage and The Bricklayers Arms Public House. The eastern half of Willow Way is also characterised by small scale industrial units and open yard space whilst the former police station is currently being redeveloped at the north-eastern end of Willow Way. Willow Way joins on to Dartmouth Road to the north and Kirkdale to the south-west. Its built form is typical of the industrial nature of the immediately surrounding area however Kirkdale and Dartmouth Road provide retail accommodation at ground floor with residential above, typical of its position as a local centre. The site enjoys a Public Transport Accessibility Level (PTAL) rating of 4, on a scale of 0 to 6b where 6b is the highest. Flood risk mapping shows that the site lies	The supplementary information is noted. Our response is set out below.	No change.

			within Flood Zone 1 representing the lowest flood risk. Additional mapping shows it is at a very low risk of tidal, fluvial and surface water flooding – while Willow Way itself features some risk of surface water flooding. As mentioned above, the site falls adjacent to a currently cleared site which formerly housed a council depot and, more recently, a temporary school site. This is owned by the council and our client has recently engaged with LB Lewisham's planning department in respect of the proposed mixed-use redevelopment of the two sites combined to re-provide high quality commercial floorspace alongside residential accommodation above. A meeting with Officers was held in January 2021, with formal written advice being received in February 2021. This meeting was broadly positive in respect of the principles of an employment-led, mixed use scheme on the combined site, recognising the position of the newly adopted London Plan and the direction of travel of the draft Local Plan. Officers raised caution over the wider Willow Way allocation and ensuring that our client as landowner sought to feed into the progression of the Local Plan. The following sections discuss those policies of relevance and our comments and observations at this stage of the plan evolution.		
Selkent Holdings (Daniel Watney LLP)	- 3	General LWA SA 09	We welcome the opportunity to engage on this exciting and evolving policy shift which supports the employment led, mixed use redevelopment of our client's site, however we hope that the contents of this letter of representation sufficiently explain our reservations over part of the Plan as currently drafted. I trust that the contents of this letter sufficiently clear, however we would welcome further engagement to discuss these concerns. If you have any queries at all, please do contact me.	Comments noted. Our response is set out below.	No change.
Selkent Holdings (Daniel Watney LLP)	3	LWA SA 09	In summary, Selkent Holdings welcome the allocation of their site as part of a wider parcel of land within the Willow Way site allocation and support the position throughout the Plan for employment-led, mixed use redevelopment of the site in line with the principles of co-location. This echoes the pre-application process that our client has gone through recently alongside their neighbouring landowner, LB Lewisham, to assess the development potential of both sites combined to deliver substantial employment floorspace alongside residential accommodation and public realm.	Support noted. Our response is set out below.	No change.
Selkent Holdings (Daniel Watney LLP)	3 3	LWA SA 09 Para 18.49 and para 18.50	**Site Allocation – West Area '9'** In terms of Lewisham's West Area Site Allocations, the Willow Way LSIS is allocated at '9', as extracted below. *LB Lewisham officer note: an extract of the site allocation boundary map and corresponding table for Willow Way site allocation is included in the original representation.* The allocation is for the below, as identified through Paragraph 18.49: *"Comprehensive employment led mixed-use development. Co-location of compatible commercial, main town centre and residential uses. Reconfiguration of buildings and spaces to facilitate a new layout with new and improved routes,*	The Local Plan provides indicative site capacities. Disagree that "minimal development capacity" should be used. Where no advanced pre-application discussions have taken place, the council has used a SHLAA based method to determine indicative site capacities – more details	No change.

			both into and through the site along with public realm and environmental enhancements." Paragraph 18.50 of the draft Plan identifies the Willow Way opportunities as being: *"The site comprises the Willow Way Locally Significant Industrial Site, which is located adjacent to Upper Sydenham / Kirkdale local centre and spans both sides of Willow Way. The site includes vacant land and a mix of lower density employment uses.* *Redevelopment and site intensification, along with the co-location of commercial and other uses, will provide a more optimal use of land and enable the delivery of new and improved workspace to support the long-term viability of the LSIS. Development will also enable public realm enhancements to improve the quality of the townscape around the local centre, and help to make the area a safer and more attractive place for business and community activity"* The approach of allocating the site as part of a wider parcel of land for redevelopment is strongly supported, as is the aspiration to create a new employment hub at this location alongside the delivery of much needed residential accommodation. The wider 1.29 hectare site is identified as having a development capacity of circa 6,700 sqm of employment space alongside 175 residential units. In terms of residential capacity per hectare, this would result in a density of 135.6 units per hectare. Whilst there is no longer a density matrix through the new London Plan, this is a conservative density for the site which would broadly be considered an urban location and benefits from a high PTAL rating of 4. We would contend that a greater density would be appropriate across this large, sustainable, brownfield site and that a density of 250-300 units per hectare would be more appropriate as a minimum and that even higher densities could be supported subject to demonstrating that there is a high quality of design. Whilst the table only recognises an indicative development capacity, we believe this should be altered to read 'minimum development capacity' to promote the optimisation of the site capacity in line with draft Policy QD6 and the approach taken within that policy. If the 'minimum' approach is not taken, then the 'indicative' approach should be increased to a higher density across the site. Applying 250-300 units per hectare would achieve an indicative development capacity of 322 – 387 units across the wider site.	can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need to provide employment uses whilst introducing residential units and to reflect the surrounding character of the site. Based on these considerations, the land use mix and residential units have remained the same. Optimal capacity for the site will be established at planning application stage through a design led approach.	
Selkent Holdings (Daniel Watney LLP)	3 3	LWA SA 09 Para 18.51	Paragraph 18.51 details the development requirements for the Willow Way allocation which we address in turn: • *"All proposals must be delivered in accordance with a masterplan to ensure the appropriate co-location of employment and other uses across the site. This must address the site's relationship with the Upper Sydenham / Kirkdale local centre, to improve the functional relationship with neighbouring uses and the public realm, along with townscape character*".	Support is noted. Agree that more clarity on "no net loss of industrial capacity" is needed. Supplementary text to Policy EC2 Protecting employment land and delivering new workspace	Willow Way LSIS site allocation amended in relation to masterplanning for sites with multiple ownerships and by providing clarity in relation to net loss of industrial capacity.

			We have outlined the general principles of masterplanning above within this letter and would reinforce our position also stands in respect of this development requirement for Willow Way. • "*Development must not result in a net loss of industrial capacity, or compromise the functional integrity of the employment location, in line with Policy EC 5 (Locally Significant Industrial Sites)*". We accept this statement regarding the net loss of industrial capacity. There is no definition contained within the plan about what constitutes 'capacity' and whether this relates to net floorspace or allows for qualitative arguments to be made about the capacity. A no net loss position would not adhere to the new London Plan as this element was amended during the Examination process to remove any reference to 'no net loss' of floorspace. We request that capacity is defined through a future iteration of the plan to confirm this does not relate explicitly to existing floorspace. • "*Positive frontages along Willow Way, Dartmouth Road and Sydenham Park, with active ground floor frontages. Positive frontages elsewhere throughout the site, where new routes are introduced*". This is welcomed and we believe positive and active frontages will be a significant public benefit to redevelopment on this wider allocation. This could be in the form of active residential frontages, active commercial / industrial frontages or retail uses and public realm provision. • "*The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area. This includes a clear hierarchy of routes, with a legible and safe network of walking and cycle routes, through the site. Particular consideration must be given to the access and servicing arrangements for commercial uses*". This is welcomed and supported. • "*Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy*". This is welcomed and supported.	provides clarity on the net loss of industrial capacity. Table 8.3 also provides a formula for calculating financial contributions for the loss of industrial capacity. The Plan should be read as a whole.	
Selkent Holdings (Daniel Watney LLP)	3 3	LWA SA 09 Para18.52	Paragraph 18.52 of the draft Local Plan details the development guidelines which we address in turn: • "*Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses*". This is acknowledged and of course is a fundamental requirement of any co-location scheme to comply with the agent of change principles set through the	Support is noted. Disagree that reference to a new route should be removed from the Plan. The text states proposals will be *expected to investigate, and where feasible*, deliver a new route. Disagree that the reference to the former Sydenham	No change.

			new London Plan and ensure that the amenity of existing and future commercial and residential occupants is not compromised. • "*Main town centre uses may be acceptable but these must be ancillary to the commercial uses and not detract from viability of the local centre*". This is noted and accepted. • "*Enhanced permeability off Willow Way will be an essential element of the design. Proposals will be expected to investigate, and where feasible, deliver a new route(s) linking from Willow Way to Kirkdale and Dartmouth Roads*". This is accepted in principle but given the lack of any direct access to Kirkdale through the allocation, other than the existing Willow Way route, this element would be difficult to secure. Improvements to the existing road and pavement can no doubt be delivered through public realm improvements but additional routes are unlikely to be achievable. • "*Additional planting and landscaping should be integrated to enhance the public realm and encourage movement by walking and cycling along Willow Way*". This is supported. • "*Development should provide for a coherent building line along Willow Way, taking into account the redevelopment of the former Sydenham Police Station site".* This is noted and understood. The reference to the former police station should not be ambiguous in terms of heights however as a relatively modest 3-4 storey building. The Willow Way site has the potential to achieve greater height towards the centre where there are less sensitivities on neighbours. • "*The design of development must respond positively to the local context, giving particular consideration to heritage assets, including the Sydenham Park Conservation Area, Halifax Street Conservation Area, Jews Walk Conservation Area, Area of Special Local Character, as well as listed building and locally listed buildings along Kirkdale*". This is noted and accepted.	Police Station site should be removed.	
Manak Homes	3	LWA SA 10	I am contacting you in relation to your consultation on the proposed site allocation located at 'Land at Forest Hill Station east (Waldram Place and Perry Vale)', this being Site Allocation 10 in the New Local Plan - an extract of the Site Allocation is attached. We are the freeholders of the now vacant MOT garage building (1a Waldram Place) and are in discussions with the adjacent taxi hire business (22-28 Perry Vale) to bring the entire site forward for development in the near future. There appears to be a slight misunderstanding of the current use class, the Nursery use class is in the 2 bed house that sits just outside of the site allocation	Agree that 1 Waldram Place is not used as a nursery and the text relating to retention or re-provision of the nursery should be removed. Where no advanced pre-application discussions have taken place, the council has used a SHLAA	Land at Forest Hill Station East site allocation amended by including 1 Waldram Place within the site boundary and removing text related to the nursery.

			(1 Waldram Place) and therefore the Nursery re-provision should not be included within the site allocation. *LB Lewisham officer note: a title plan of the 2 bed corner house and a street view image showing this house circled in red are included in the original representation.* Lastly, we would like to discuss if there is any opportunity to increase the residential units to above the current figure of 41.	based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need for an appropriate a mix of employment and town centre uses at this district centre site, whilst introducing residential uses and creating a sense of arrival into the district centre. Based on these considerations, the land use mix and residential units have remained the same. Optimal capacity for the site will be established at planning application stage through a design led approach.	
	3	LWA SA 12	I am writing to formally object against the planning proposals for the site of **'Land at Sydenham Road and Loxley Close'** in the Lewisham West area. Whilst I completely understand the need for housing and the local plan, I really do not believe that this site/my part of the site can help address this problem in this particular area. There are only two shops and three flats that front Sydenham Road in this plan and I own one of the shops and the flat above it. As the owner of these two units I would not be interested in developing or selling to a developer (I will explain in more detail later). I believe that my site is already developed to capacity (using building lines from existing neighbours) after we converted the upper part of the shop into a separate residential dwelling In 2010 (your ref: fp/09/08690).	Comments regarding the landowner not wanting to develop or sell the furniture shop are noted.	Land at Sydenham Road and Loxley Close site allocation boundary has been amended to exclude the furniture shop.
	3	LWA SA 12	Our neighbouring shop (Lidl), is the last large/largest commercial unit in Sydenham Road until you reach the Bell Green estate. It is also developed to capacity with two residential flats above the shop. This is the largest retail unit and supermarket in Sydenham serving the community in this area.	Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal	No change.

			The car park at the rear of the buildings (but currently not a through road, joined or belonging in any way to myself or Lidl) is the only car park in this area that serves the community before you go to the Bell Green estate. Until recently, the car park has always been free and served the local shops and residents by making sure that provision is made for people to visit this shopping area. The car park was well used and never to full capacity ensuring that parking was always available when needed. Recent parking (and quite frankly, stupid) policies in this car park have meant that it is being barely used causing parking problems for local residents and making it harder for local businesses with potential customers simply driving through because of the complexity of parking. This car park situation needs re-addressing than rather development. The area itself is very densely populated with existing high level estates on Mayow Road, Sydenham Road and Bell Green causing a strain on all the necessary infrastructure required to cope with the current levels of residents. To add significant numbers to this population after the lack of investment in recent years in the local infrastructure would be further strained. In the web meeting it was suggested than planning should complement with the Bell Green estate rather than compete with it. If that is also the case in reverse, then this end of Sydenham Road would need parking and a supermarket to help the diversity of this part of Sydenham for those wishing to walk to a local supermarket rather than always use, possibly, polluting transport to access the Bell Green estate.	use of land to support the vitality and viability of the town centre. Redevelopment of the site can also make a more optimal use of land by considering options for the car park, including rationalising the existing level of provision, taking into account needs of visitors and businesses along with public transport accessibility levels.	
	- 3	General LWA SA 12	I would also like to thank [name removed] for his time, emails and phone call addressing my complaints and concerns on this matter. I hope that this letter/ email / objection helps with any future decisions about this site in your local plan decisions. Thanks you for all your help and time in this matter.	Comments noted. Our response is set out above.	No change.
	-	General	*Just some history of this shop, my business, my reasons for being concerned...*	The supplementary information is noted. Our response is set out above.	No change.
	3	LWA SA 12	*This shop is a family business and we sell and buy second hand furniture and antiques and we have been here since 2004. My father passed this business on to me and his grandfather before him.* *When we looked to relocate to this area in 2004 it was because we wanted to be closer to my father who has bad health and disabilities. Basically, the locality of this shop to my father (and his accessibility via his mobility scooter) has meant that he has always had a purpose in life and opportunity to come and participate in our day and we have always been local to our parents for any help that they may need. The shop has been a blessing and is the family hub of all activities and communication. It cannot be underestimated how important it is for all the mental wellbeing of a disabled person to be able to get out and go somewhere (something we can all appreciate after this year and the Covid situation).* *We started to relocate in 2001 and it took us three years, a lot of money and a lot of effort to find a shop that catered for all our needs. With no exaggeration, this was a really tedious and difficult search and we paid much more than market value to secure these premises.*		

			In 2010 we converted the upper (storage) part of the shop into a flat so that we could also house a vulnerable sister. Search the council tax register and you will see her name residing there since 2010. *The future plan is that my son, who is a chiropractor, will inherit the shop and use it as a practice, be near the family and in a position to help his disabled brother (my other son). All of this can be achieved with the locality of the shop to the family.* *I hope this helps to address my concerns and genuine fear of any plans that may harm this shops future and all of my family that depend on it in in ways far more important than income or finances.*		
The Cherwell Group (DP9 obo)	3 3	Part Three	*Relates to Part 3, LNA SA 14* We note that the Site Allocations Background Paper (2021) states that, "*The indicative capacities should not be read prescriptively. The actual development capacity of a site will ultimately need to be determined through the detailed design and planning approval process*." We therefore request that wording is introduced into the beginning of the Site Allocations chapter to identify how these indicative capacities should be interpreted and noting that they are included for reference purposes only.	Agree.	Part 3 of the Local Plan amended by referencing that site capacities are indicative only and should not be read.
QUOD (Landsec obo - Lewisham Shopping Centre)	4 -	DM 01 Infrastructure Delivery Plan	**14 Part Four – Delivery and Monitoring** 14.1 Landsec supports Policy DM1 'Working with stakeholders to deliver the Local Plan' which sets out the Council 'proactive and positive approach' for working withing with landowners, community groups and the local community, and other key stakeholders. Landsec will work collaboratively with the Council. 14.2 Landsec supports the need for appropriate infrastructure to support development in the Borough and create the types of places that people want to live in, work in and visit. The Draft Infrastructure Delivery Plan, part of the Council's evidence base sets out the potential infrastructure requirements for the Borough by type of infrastructure. For certain types of infrastructure, it identifies specific locations (eg. a specific Town Centre) but it doesn't take a spatial overview of requirements, for example in growth locations. 14.3 As the Council has already demonstrated in its regeneration work in the Town Centre to date taking an overview of infrastructure and investing in high quality facilities, infrastructure and public realm is crucial to achieving transformative change. Landsec would wish to engage with the Council to take such an approach to its emerging proposals and also to look at how CIL and Section 106 obligations can be re-invested in the Town Centre and leverage in other funding.	The IDP sets out the Infrastructure requirements thematically and this will then inform discussions through the development management process.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	4	DM 02	14.4 Landsec notes the contents of Policy DM2, which effectively re-states the current policy and legal position on Planning Obligations and Section 106. Landsec also notes that the changes made to Planning Practice Guidance in 2019 suggest that in setting policy requirements for such obligations plan makers should undertake "a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost	The IDP sets out the Infrastructure requirements thematically and this will then inform discussions through the	No change.

			implications of the Community Infrastructure Levy (CIL) and section 106." And that policies should give a level of certainty about what obligations will be required and that they are affordable. 14.5 As presently drafted Policy DM2 gives an open-ended list of items for which obligations might be sought. As noted above in Section 8 the Local Plan Viability Assessment (2019) produced as part of the evidence base does not include for abnormal costs for Lewisham Shopping Centre sites and that viability is challenging. 14.6 In this context Policy DM2 should confirm that usually the value of obligations will not exceed whatever forms the basis of the assumptions in the Viability Study (S106: £20/sqm for non residential development and £1,500 per residential unit, S278: £15/sqm for commercial and £1,000 per residential unit). This also re-enforces the need for the site-specific amendment to policy set out at Paragraph 8.22 above.	development management process.	
Freeths LLP (K/S Lewisham obo)	3 4	LCA SA 02 DM 03	**Short-Medium Term Flexibility** As the emphasis of the allocation is on comprehensive mixed-use development, this indicates an unwillingness to engage or support any schemes that come forward in the allocation area on individual sites. This was reflected in a pre-application meeting held with Officers on the site in June 2019. We note the requirements and explanation given in draft Policy DM3 and how development proposals must be accompanied by a site masterplan where they form all or part of a site allocation. This includes how to address neighbouring properties and the surrounding areas. This is a potentially greater degree of flexibility than was explained in the June 2019 pre-application. There is however a risk that until such time as the majority landowner/promoter in a particular allocation has identified and made clear their objectives and own masterplan content that any other development plots and opportunities will simply not progress or be allowed to progress in the interests of not prejudice future development potential and the preference for a comprehensive approach. This is the risk in the Lewisham Town Centre site allocation where development decisions are largely reliant on one majority landowner party. The applicant held discussions with Land Securities in 2020 as encouraged by the Council but there is no detail as yet from them on the content and timescales of any future scheme after an options consultation undertaken in Autumn 2020. To provide greater flexibility and responsiveness, Policy DM3 and any development allocation which requires a comprehensive approach should also explain how smaller short medium term proposals can be supported. We note this is covered to an extent in DM3 paragraph C, but there should also be greater support for smaller sites/plots in coming forward where there is no indication or commitment on the part of surrounding landowners to progress development. This will then avoid a scenario where no development / investment can proceed which will undermine the growth and place making objectives of the Plan. We would welcome the opportunity to discuss with the Council in the context of Site 2 particularly.	The Local Plan already includes a policy on Meanwhile Uses which states Proposals for the meanwhile (temporary) use will only be supported where the site or unit falls within the boundary of a site allocation that is not expected to come forward for comprehensive redevelopment in the short term and where it does not preclude the permanent use of the site for appropriate commercial or main town centre uses, or prohibit delivery of the site allocation.	No change.

QUOD (Landsec obo - Lewisham Shopping Centre)	4	DM 03	14.7 For the reasons set out above Landsec strongly supports the need for a comprehensive approach to the development of strategic sites and commitment to such an approach to Lewisham Centre. Landsec notes that the NPPF (para 44) suggests that information requirements for applications should be kept to the minimum required to make decisions and that: "*Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question*". 14.8 It may therefore be useful, to avoid the risk of duplication and for clarity if Draft Policy DM3 referred to the fact that the site masterplan and delivery strategy may be incorporated into other submission documents such as the Design and Access Statement and Development Specification, rather than a stand-alone document. 14.9 In relation to DM3c Landsec again supports the need for development to have regard to surrounding properties and the wider area. However, any requirement to Masterplan sites that are not part of an application must be limited and proportionate, and it may be that in many cases the necessary information would not take the form of a 'Masterplan' but of illustrative materials showing how a development site might relate to neighbouring areas. 14.10We would therefore suggest the following revision to Policy DM3 c): *Proposals must address how the development site relates to neighbouring properties and the surrounding area, particularly in contributing to the delivery of the spatial strategy for the Borough. Where appropriate, and necessary applications will be required to be supported by a masterplan or other illustrative design materials covering multiple other sites in order to demonstrate the acceptability of the scheme both in term of its immediate and wider context. This is may be additional to the site masterplan required by (A) and (B) above.*	We feel the wording is robust.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	4	DM 05	14.11 As set out in Section 12 of these Representations, Landsec supports the Council's approach to monitoring and review, particularly with regards to community and social infrastructure in the context of changing demographics. Landsec therefore supports Policy DM5 'Monitoring and review'.	Support noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	5	Appendix 2	**Glossary** 11.24The Reg 18 Plan should refer to the need to apply the London Plan definition of Metropolitan status flexibly to reflect the changing nature of town centres. The role and function of town centres might not necessarily relate to traditional numeric definitions of floorspace quantum, but rather one based on vitality and viability. The outcomes that are secured through investment in a town centre such as jobs, homes, businesses, health and wellbeing, safety, permeability, building beautiful, carbon reduction, accessibility, culture, happiness and urban greening might become the new ingredients for success and ambition. More floorspace is not necessarily better as the Mayor of London reports in his High Streets and Town Centres Adaptive Strategies. 11.25Landsec request that the definition of Metropolitan Town Centre on (page 827) be amended as follows: *The London Plan defines these as serving ~~serve~~ wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically,*	Disagree with the proposed wording. The approach taken in the Local Plan is in conformity with the London Plan, that identifies Lewisham as a having the potential to become a Metropolitan Centre in the future.	Local Plan Glossary amended to reference London Plan definition

			they contain at least 100,000 sqm of retail, leisure and service floorspace with a significant proportion of high order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings. Due to the structural shift in London's Town Centres, Lewisham Council consider that flexibility should be applied to the floorspace metric in the London Plan. In seeking to achieve Metropolitan Town Centre status, Lewisham Council will apply weight to structural improvements in town centre vitality and viability and outcomes secured through investment in the town centre for jobs, homes, businesses, health and wellbeing, safety, permeability, exemplar design, carbon reduction, sustainability culture, and the green and blue environment. Lewisham Council considers that these factors are new ingredients for success and ambition of a Metropolitan Town Centre.		
Phoenix Community Housing Association (Maddox Planning obo)	- -	General Policies map	**LEWISHAM LOCAL PLAN REGULATION 18 REPRESENTATIONS** **LAND TO THE REAR OF ARCUS ROAD/CHINGLEY CLOSE** Please find enclosed a representation to the Regulation 18 Lewisham Local Plan, submitted on behalf of our client, Phoenix Community Housing Association. This representation relates to the proposed extension to the site designation of Bromley Hill Cemetery as a Site of Local Importance (SINC) and to the historic Public Open Space designation adjacent. Our client requests that two changes are made to the Local Plan draft proposals map. The first that the boundary of Public Open Space at the north east of the designation be corrected to follow the correct boundary of the genuine Public Open Space within the confines of the cemetery. The second is that the proposed extension to the SINC designation is not taken forward into the next stage of the Local Plan.	Following Regulation 18 Consultation an Open Space Review has been prepared which has reviewed the boundaries of designated open space to ensure they accurately capture the extent of the open space.	Local Plan amended to show Bromley Hill Cemetery as designated Strategic Open Space, with its boundary amended to exclude private gardens and communal amenity space of the Swiftsden Way properties.
Phoenix Community Housing Association (Maddox Planning obo)	- -	General Policies map	**BACKGROUND** Our client, Phoenix Community Housing Association, is currently undergoing pre-application discussions with Officers at Lewisham Council regarding the redevelopment of land to rear of Arcus Road/ Chingley Close to provide new homes with integrated landscaping (PRE/21/120195). The latest pre-application response was issued to our client on 24 February 2021. In 2015, a land swap was carried out between Lewisham Council and Phoenix Housing, resulting in Phoenix Housing acquiring the land shown outlined in blue below. Historic maps indicate some of this land at the north west of the plot might have formerly been used as private allotments in the 1970s but this is not confirmed, and certainly not the case now. The land has been left to become overgrown and has not been in use as allotments for at least 23 years. 1 **https://councilmeetings.lewisham.gov.uk/ieDecisionDetails.aspx?Id=2270** *LB Lewisham officer note: Image 1: Phoenix Community Housing Association site ownership plan is included in the original representation. The map shows the extent of the site's ownership*	The supplementary information is noted.	No change.
Phoenix Community Housing Association	- -	General Policies map	I trust the above is clear and the suggested amendments to the designations will be fully considered, however please don't hesitate to get in touch should you wish to discuss any of the above.	Comments noted.	No change.

(Maddox Planning obo)					
Tribe Student Housing (Avison Young obo)	-	Policies map	*Relates to Part 3, LNA SA 06* **Proposed Changes to the Adopted Policies Map** As set out in paragraph 5.5, alterations are proposed to Surrey Canal Road SIL in order to enable to co-location of employment and other uses in line with draft London Plan policies E5 and E7. This provides for the de-designation of Apollo Business Centre, Trundleys Road and Evelyn Court sites from SIL (these are now proposed site allocations for comprehensive employment-led mixed-use redevelopment). The Bermondsey Dive Under site is proposed to be captured as a new addition to this SIL designation and is effectively replacement SIL provision for the aforementioned co-location sites. This approach is shown in the following diagrams: *LB Lewisham officer note: Figure 2: Diagrams from LBL Proposed Changes to Adopted Policies Map are included in the original representation. They show existing and proposed boundary changes to Surrey Canal SIL.* Notwithstanding the above comments, we are supportive of the de-designation of the Trundley's Road site from SIL and allocation of the site for commercial-led mixed-use development. We are also supportive of the approach to include the Bermondsey Dive Under site within the SIL designation.	Support noted.	No change.
Trundley's Road Ltd (Avison Young obo)	-	Policies map	*Relates to Part 3, LNA SA 06* **Proposed Changes to the Adopted Policies Map** As set out in paragraph 5.5, alterations are proposed to Surrey Canal Road SIL in order to enable to co-location of employment and other uses in line with draft London Plan policies E5 and E7. This provides for the de-designation of Apollo Business Centre, Trundleys Road and Evelyn Court sites from SIL (these are now proposed site allocations for comprehensive employment-led mixed-use redevelopment). The Bermondsey Dive Under site is proposed to be captured as a new addition to this SIL designation and is effectively replacement SIL provision for the aforementioned co-location sites. This approach is shown in the following diagrams: *LB Lewisham officer note: Figure 2: Diagrams from LBL Proposed Changes to Adopted Policies Map are included in the original representation. They show existing and proposed boundary changes to Surrey Canal SIL.* Notwithstanding the above comments, we are supportive of the de-designation of the Trundley's Road site from SIL and allocation of the site for commercial-led mixed-use development. We are also supportive of the approach to include the Bermondsey Dive Under site within the SIL designation.	Support noted.	No change.
	3 2	LNA SA06 EC 02	*Relates to Part 3, LNA SA 06* As set out in paragraph 5.5, alterations are proposed to Surrey Canal Road SIL to enable the co-location of employment and other uses in line with draft London Plan policies E5 and E7. This provides for the de-designation of Apollo Business Centre Trundley's Road and Evelyn Court sites from SIL (these are now proposed	Support noted.	No comment.

			site allocations for comprehensive employment-led mixed-use redevelopment). The Bermondsey Dive Under site is proposed to be captured as a new addition to this SIL designation and is effectively replacement SIL provision for the aforementioned co-location sites. This approach is shown in the following diagrams: **Figure 2 Diagrams from LBL Proposed Changes to Adopted Policies Map.** Notwithstanding the above comments I am supportive of the de-designation of the Trundley's Road site from SIL and allocation for commercial-led mixed use development. I am also supportive of the approach to include the Bermondsey Dive Under within the SIL designation.		
Phoenix Community Housing Association (Maddox Planning obo)	- 2 2 5	Policies map GR 02 Figures 10.1 and 10.2 Schedule 07 Table 21.2	**PUBLIC OPEN SPACE: ADOPTED POLICY CONTEXT AND EVIDENCE BASE** The below map is an extract from the adopted Proposals Map. It shows the area in light green designated as Public Open Space' and the dotted area overlaying it as a 'Site of Importance for Nature Conservation'. *LB Lewisham officer note: Image 2: Lewisham's adopted proposals Map is included in the original representation. The map shows the extent of the Public Open Space and the Site of Importance for Nature Conservation'.* The pre-application submission includes some built development on the Public Open Space at the north east area of the designation, which is land within Phoenix's ownership. This overlap has been noted by the Council in recent discussions and the pre-application response as mentioned above states that '*Development on the area identified as public open space will only be supported where this area is de-designated. It was discussed at the meeting that the land may have been designated in error. Both the Applicant and Officers agreed to explore this further. De-designation should occur through the Draft Lewisham Local Plan. The Applicant should submit detailed representations to the Regulation 18 consultation, which includes the partial allocation of the application site.'* It is not understood as to why the area of Public Open Space at the north east outside the cemetery land was designated in the first instance given that the area is not accessible to members of the public and makes up the private rear gardens of the residential block adjacent along Swiftsden Way. As Officers have alluded, it was likely designated in error. The Lewisham Leisure and Open Space Study 2013 confirms the Public Open Space designation was indeed made in error as the area of land to the north east outside the cemetery boundary was originally thought to be part of the cemetery. The classification map from the 2013 Study, shown below in Image 3, clearly shows that the boundary of the cemetery was originally drawn incorrectly by including the rear private gardens and communal amenity space of the Swiftsden Way properties. Comparing this with Google Maps in Image 4 it is clear where the true boundary of the cemetery lies. *LB Lewisham officer note: Image 3: Lewisham Leisure and Open Space Study 2013 (Site 39) and Image 4: Google Maps extracts are included in the original representation. They show the discrepancy where the boundary lies.*	Following Regulation 18 Consultation an Open Space Review has been prepared which has reviewed the boundaries of designated open space to ensure they accurately capture the extent of the open space.	Local plan amended to show Bromley Hill Cemetery as designated Strategic Open Space, with its boundary amended to exclude private gardens and communal amenity space of the Swiftsden Way properties.

			PROPOSED CHANGE TO THE ADOPTED PUBLIC OPEN SPACE DESIGNATION The above evidence demonstrates that the area to the north east of the cemetery was originally thought to be part of the cemetery and designated accordingly as Public Open Space. It is requested this error be corrected to reflect the true cemetery boundary. The area that was incorrectly designated is for the residents of the block along Swiftsden Way to enjoy privately and is currently not publicly accessible. There is no circumstance in which this land could or should become public or connected to the cemetery, therefore it should not be designated as such.		
Phoenix Community Housing Association (Maddox Planning obo)	- 2 5	Policies Map Section 08 Page 52 GR 03 Figure 10.7 Schedule 08 Table 21.3	**SITE OF LOCAL IMPORTANCE: EMERGING POLICY CONTEXT** As part of the Regulation 18 Lewisham Local Plan it has been proposed to extend the boundary of the Bromley Hill Cemetery SINC designation northwards as shown in green on the below Image 5. If progressed to the next stage of the Local Plan preparation, this would therefore result in most of the phase 1 development site being stringently protected and unlikely to be suitable for built development. In effect, this proposed designation could prevent the delivery of much needed affordable housing. *LB Lewisham officer note: Image 5: Regulation 18 proposed extension of the Bromley Hill Cemetery SINC is included in the original representation. The map shows the proposed addition.* The presumed reason for the proposed extension is that the Re-survey of Sites of Importance for Nature Conservation (SINCs) in Lewisham Report 2016, which is part of evidence base for this new Local Plan, identified Bromley Hill Cemetery as a site with a decline in acid grassland with a SINC Enhancement Opportunity that would *'benefit from a management plan to identify areas most suited for management for wildlife, in particular areas of acid or dry grassland'*. The land to the north was identified as 'scrub'. The Lewisham Open Spaces Assessment 2020 has classified this land to the north as 'natural and semi-natural urban green space', which is a new classification since the 2013 Open Space Study where it wasn't acknowledged at all, despite the site conditions not changing. **PROPOSED CHANGE TO THE EMERGING SINC DESIGNATION** It is considered this proposed extension to the SINC was made in error without all the correct site details available to the Council. The land is completely inaccessible either through the rear gardens of the houses, through the cemetery, or via the garages to the west, and so would not be able to be managed or maintained if designated. The land is also privately owned by our client, so the Council would have no ability to control the management or maintenance even if they could access the site. Our client is not disputing the need for a management plan for the cemetery given this land has been found to be in decline. They are however disputing the idea that in order to rectify this decline the SINC needs to be extended up into	Agree that due to access and ownership constraints the SINC should not be extended	Local Plan to retain the current boundary of the SINC without extending it.

			private land. The 2016 Re-survey lacks clear justification for extending into this particular area with regards to specifying the features of the land that make it appropriate for a SINC, having not been able to access the land or consult the land owner. It indicates a thorough assessment of the land was not carried out and the decision was made without a full understanding the site. NPPF paragraph 35 requires Local Plans to be prepared in accordance with legal and procedural requirements. A Plan is 'sound' if it is justified, whereby it is appropriate and takes into account the reasonable alternatives based on proportional evidence, and effective, whereby it is deliverable over the plan period and based on effective joint working on cross-strategic matters. In this case the proposal to extend the SINC is not considered to be justified or effective and so not considered a 'sound' amendment to the Local Plan. Furthermore, Lewisham's Open Spaces Assessment 2020 has assessed the proposed new area of SINC land as being of 'poor quality', scoring just 13%, with 'no access', see below Image 6. This area of scrubland cannot make any valuable or meaningful contribution to the established SINC given it is constrained on all sides, is privately owned, and has few redeeming environmental qualities. It is considered this poor quality small parcel of land would be much better used to deliver affordable housing for the Borough, a strategy which is fully supported by the Council. Notwithstanding this, the proposed redevelopment of the site does offer the opportunity for biodiversity enhancements to take place and an ongoing management plan to be secured alongside sensitively designed new housing. This will enable the council to meet its broad objective to enhance opportunities for nature in this locality. *LB Lewisham officer note: Image 6: Lewisham's Open Space Assessment 2020 is included in the original representation. The map shows the site categorised as fair and poor.* Retaining the boundary of the SINC as it currently is would have minimal harmful impacts on local nature conservation given that the condition of the proposed new area is poor quality scrubland that has been in the same poor condition for approximately 40 years with no viable means of improving or managing it. Retaining the boundary of the SINC would also enable the required management plan to be drawn up whilst delivering significant public benefits by allowing our client to bring forward much needed affordable housing for the Borough.		
Big Yellow Storage Company Limited (DWD obo)	-	Policies map	**Proposed Changes to the Adopted Policies Map** Paragraph 5.8 of the *'Proposed Changes to the Adopted Policies Map'* states that the new Local Plan proposes to change the terminology of LEL, as used in the adopted Local Plan, to 'Locally Significant Industrial Site' (LSIS), for consistency with the terminology used in the London Plan. Paragraphs 5.9-5.11 confirm the designation of an additional LSIS, alterations to the boundary of some of the existing LELs, and the LEL boundaries which will remain in their existing state (as the newly named LSIS). The existing Lewisham Way LEL is not referenced as an LSIS in the draft consultation document, nor is it referred to in the proposed changes to the policies map as being de-designated. Conversely, Figure 8.1 shows a map of the employment land hierarchy and illustrates the Site as forming part of an LSIS.	Agree that there are inconsistencies in the designation of this site as an LSIS throughout the Local Plan and policies map.	Local Plan and Proposed Changes to Adopted Policies Map amended to list Lewisham Way as a designated LSIS.

			We **request that clarity is provided** as to whether the intention is for the Lewisham Way LEL to be retained in the LSIS or not in the new Local Plan.		
Blackheath Car Park (M&A) Ltd (Acorn obo)	- -	General Call for site	You might recall you kindly sent me an application form in response for your call for sites which needs to be submitted before 11th April. I would like to propose to sites in a similar location as follows : **1) Blackheath Station Car Park Hurren Close London SE3 9LE** **2) Airspace Above Network Rail Tracks & Blackheath Station Car Park Hurren Close London SE3 9LE** It would be really helpful to know what is the broad programme and timescales for these sites to be considered. I would imagine they would be considered internally by the Council first at a cabinet meeting. Hopefully this is all the information you need for now but please do not hesitate to contact me should you require any clarification or additional information. Please let me know that you have received this email. Please could you keep me updated on the Local Plan.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Blackheath Car Park (M&A) Ltd (Acorn obo)	-	Call for Site	*LB Lewisham officer note: a Call for sites submission form and map showing the site boundary are included in the original representation.* Site name and address: Blackheath Station Car Park Hurren Close London SE3 9LE Proposed use(s): Retention of Car Park & Market - Numerous Options within Class E including Retail Offices Medical Services etc. Class C & Class F.	The call for site submission for Blackheath Station Car Park is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.
Blackheath Car Park (M&A) Ltd (Acorn obo)	-	Call for site	*LB Lewisham officer note: a Call for sites submission form and map showing the site boundary are included in the original representation.* Site name and address: Airspace above Network Rail Tracks and Blackheath Station Car Park Hurren Close London SE3 9LE Proposed use(s): Significant Opportunities to create a new Village Hub to potentially include significant Public Realm ,Improved Porosity across Rail Tracks ,Affordable Housing, Art House Cinema/Meeting Hall , Share Ownership Commercial Space, Small Food Store ,Permanent Covered Market ,Creche /Nursery, Car Charging Hub, significant Enhanced Green Corridor , plus - Numerous Options within Class E including Retail Offices Medical Services etc. Class C & Class F.	The call for site submission for Airspace above Network Rail Tracks and Blackheath Station Car Park is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.
W&R Buxton Holdings Ltd (BPTW obo)	-	General Call for site	**Site Context / Background** The Site is 0.097ha in area. It is located entirely within the administrative boundary of the London Borough of Lewisham (LB Lewisham). The Site's current Use Class is Sui Generis. Scott House comprises 19no. live / work units, consented in 2001. The existing building is a 3-storey late Victorian building which currently provides 408sqm of B1 'work' space according to approved plans. The Applicant, W&R Buxton Holdings Ltd., is the landowner and landlord of the existing building on the Site.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			LB Lewisham officer note: Figure 1: Site location is included in the original representation. The aerial photograph shows the boundary of the site adjacent to the north eastern corner of the Timber Yard site (LNA SA 02). **Core Strategy 2011 – Strategic Site Allocation 4 Oxstalls Road** The Site is located within the Lewisham, Catford and New Cross Opportunity Area (London Plan 2016) and is approximately 500m from Deptford District Town Centre. The Site is currently allocated for mixed-use redevelopment within Lewisham's Core Strategy (2011), within Strategic Site Allocation 4 – Oxestalls Road (SSA4) Mixed Employment Location (MEL). The subject Site occupies the north eastern corner of the wider Strategic Site Allocation, which is approx. 4.6 ha in area and spans the entire urban block bounded by Oxestalls Road, Grove Street, Evelyn Street and Dragoon Road. *LB Lewisham officer note: Figure 2 Strategic Site Allocation 4 is included in the original representation.The map shows an extract from the Core Strategy 2011 showing the site's boundary.* The remainder of SSA4 is occupied by the Lendlease Timberyard Masterplan scheme with Hybrid planning permission (DC/15/092295) and Reserved Matters Planning Approval for certain phases with part of the site already under construction. Scott House did not form part of the Timberyard planning application. **Draft Local Plan 2021** The Timberyard Masterplan is now included in the Draft Local Plan 2021 as Timber Yard, Deptford Wharves at Oxstalls Road mixed Use Employment location. The allocation is for mixed use redevelopment with an indicative development capacity of 1,600 residential units and 5413 sqm of employment floorspace and 5,000 sqm of main town centre floorspace. The allocation does not include Scott House.		
W&R Buxton Holdings Ltd (BPTW obo)	-	General Call for site	**Planning Application ref: DC/19/113332** A planning application for the redevelopment of Scott House was submitted to LB Lewisham in July 2019. The application sought full planning permission for the following description of development: Redevelopment of Scott House including partial façade retention and construction of a new mixed-use building to provide 137 no. residential dwellings, together with the provision of B1 employment space and A3 café space, with associated landscaping, play space, refuse storage, cycle parking and additional public realm. Following extensive consultation with LB Lewisham officers and the local community the planning application proposed the following: • Part-retention of Scott House façade; • 137no. residential flats (1-, 2-, and 3-bedroom at social rent, London Living Rent and market tenures); • 100% dual-aspect dwellings;	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			• 824sqm of employment floorspace at mezzanine and first floor (Use Class B1) providing 64-103 full time jobs under B1(a) use, 14-21 full time jobs under B1(b) use, and c.18 no. full time jobs under B1(c) use. • 120sqm of café space at ground floor (Use Class A3) providing employment for 6-8 FTEs; • 14no. wheelchair accessible / adaptable dwellings; • Cycle parking provision in line with draft London Plan (2017) requirement; • Improved communal and public amenity spaces; • Completion of the 'final piece' of the Timberyard Masterplan / SSA4 Allocation through a well-integrated scheme which responds to the emerging context; • Opportunity for public realm improvements; • Play space and amenity provision at ground floor level. *LB Lewisham officer note: Appendix 1 Committee Report (LPA ref: DC/19/113332) is included in the original representation.* Planning officers recommended the application for approval. The application was presented to LB Lewisham strategic planning committee 30th January 2020 where members resolved to grant planning permission subject to completion of a satisfactory 106 agreement and no direction being received from the Mayor of London. The Mayor has confirmed in writing that he is content to allow the local planning authority to determine the case itself and the s106 agreement is in the process of being completed and signed.		
W&R Buxton Holdings Ltd (BPTW obo)	-	Call for site	**Scott House, 185 Grove Street, SE8** In response to The Lewisham Local Plan Consultation, we wish to promote Scott House, 185 Grove Street, SE8 on behalf of W&R Buxton Holdings Ltd to be included in the Local Plan as a mixed-use location to include B1 employment space and residential use. **Summary and Conclusions** Scott House has a resolution to grant planning permission and will shortly be granted full planning permission by LB Lewisham to provide 137 residential units, 824sqm of employment floorspace and 120 sqm café space. For this reason, we consider that the site should be included in the LB Lewisham Local Plan as an allocated site for mixed use redevelopment to include residential use and employment use in accordance with the development capacity agreed within planning application DC/19/113332.	The call for site submission for Scott House is noted. Agree that there is merit in including the consented Scott House site within the Deptford Landings site allocation.	Deptford Landings site allocation amended to include Scott House.
The Arch Company Properties LP (Turley obo)	-	Call for Site	*LB Lewisham officer note: a Call for sites submission form and site plan showing the site boundary are included in the original representation.* Site name and address: Land at Station Approach, Burnt Ash Hill, Lee, London, SE12 0AB. Proposed use(s): Residential-led redevelopment of site (exceeding the minimum threshold of 10 residential units).	The call for site submission for land at Station Approach, Burnt Ash Hill is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.

(Peter Pendleton & Associates Ltd obo)	-	Call for site	I refer to the call for sites - We were supposed to submit this for consideration. Although this call has closed, i was wondering if this site could be added for consideration in the future. Please add our details on consultee lists on behalf of the land owner. *LB Lewisham officer note: a site plan of Courtrai Road is included in the original representation. It shows a tree survey on the Courtrai Road site.*	The call for sites submission for the Old Scout Hut and surrounding land at Courtrai Road is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.
AA Homes and Housing (Wsp obo)	-	Call for site	On behalf of the landowner, AA Homes and Housing, we wish to put forward the enclosed site at Courtrai Rod, Lewisham as a proposed housing site in response to Lewisham Council's 'Call for Sites' consultation as part of the wider Local Plan process. The site provides a good location for new housing which can be developed over the next 5 years, delivering not only benefits in terms of providing key housing for the community but also management and maintenance of a historically disused site. **The site** The site is located on Courtrai Road, Lewisham and is approximately 1.1ha in size. It is bound by a railway line to the west serving major train stations in central London, and the rear gardens of properties to the east which align Buckthorne Road. The surrounding area is predominantly low rise and residential in nature. The site is accessed from Courtrai Road to the south. At this end is a declining prefabricated building previously used as a church but has remained vacant for some time. The remaining part of the land is covered by trees and foliage which have been identified as having low to moderate ecological value. The building on site is not listed and the site is not within a conservation area. It has a PTAL rating of 3 and is approximately 400m from Honor Oak Park station indicating its sustainable nature. **Development potential** The NPPF is clear in section 2 that the purpose of the planning system is to achieve sustainable development and that the planning system has three overriding objectives (economic, social and environmental). The economic objective includes helping to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right place at the right time to support growth and innovation. The social objective includes supporting communities by fostering a well -designed and safe built environment with accessible services and open spaces that support communities' health, social and cultural well-being. The environmental objective includes making effective use of land, helping to improve biodiversity and moving to a low carbon economy. All of which this site can deliver. The site is situated in a suitable and sustainable location within the built settlement. Given its links with the existing adjacent built area, including access to key local services and facilities, the site lends itself to residential development.	Comments supplementary to the call for sites submission are noted. Our response is set out below.	No change.

			The development of the site would see a underused and unmanaged site deliver both a high quality development and allow for part of the site to become managed green space to link to the aspirations of both the Local Plan and emerging Crofton Park And Honor Oak Neighbourhood Plan in terms of conservation. The delivery of housing on this site would therefore assist in providing much needed housing to meet local needs and in particular will provide an appropriate contribution to the level of housing required in Lewisham. Importantly, redevelopment of the brownfield site could facilitate new public access to the remainder of the site, in conjunction with dedicated improvements to the biodiversity of the rest of the site. We set out below a brief justification to demonstrate how the site meets the required criteria of being suitable, available and achievable. **Availability** The site is in single ownership with no legal or ownership impediments to development and is available for development now. The site does not lie within an area of flood risk and is therefore, in principle, suitable for development. There are no known physical or legal constraints which would preclude development from coming forward at this stage. **Achievability** The NPPG advises that a site is considered achievable for development where there is a reasonable and realistic prospect that the particular type of development will be developed on the site at a particular point in time. Taking into account its context and characteristics, we are is satisfied that the site offers a realistic and viable prospect for development in line with the tests of NPPF. **Deliverable** The site is suitable, available and the proposed development is achievable and therefore the site is considered to be deliverable within 5 years.		
AA Homes and Housing (Wsp obo)	- 2 2	Call for site HO 01 HO 02	**Summary** The emerging Local Plan sets out a 10-year strategic housing target of 16,670 net housing completions (or 1,667 net completions per year). The site will make a modest but helpful contribution towards this target as well as contribution to policy HO2 Optimising the use of small housing sites which is based around the NPPF (2019) placing a strong emphasis on the role of small sites in supporting housing delivery. Given its sustainable location and connection to the existing residential and urban area, the site lends itself to residential development, providing a logical and sustainable infill development to the existing urban area of Lewisham. The site is single ownership and controlled by AA Homes and Housing, representing an available site in line with the tests of NPPF. There are no significant constraints which could not be overcome, and the site offers a realistic and viable opportunity for development.	Comments supplementary to the call for sites submission are noted. Our response is set out below.	No change.
AA Homes and Housing (Wsp obo)	-	Call for site	In light of the above, we can confirm that the site is suitable, available and achievable for residential development. We would therefore respectfully request that this site is retained as a future development opportunity and considered under the call for sites exercise.	Comments supplementary to the call for sites submission are noted. Our response is set out below.	No change.
AA Homes and Housing (Wsp obo)	-	Call for site	*LB Lewisham officer note: a Call for sites submission form and site plan showing the site boundary are included in the original representation.*	The call for sites submission for the Old Scout Hut and surrounding	No change

			Site name and address: Old Scout Hut and land surrounding at Courtrai Road Proposed use(s): Residential dwelling houses – use class C3	land at Courtrai Road is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	
L&Q Group	- -	General Call for site	**LEWISHAM LOCAL PLAN – REGULATIONS 18 STAGE "MAIN ISSUES AND PREFERRED APPROACHES" DOCUMENT (JANUARY 2021) AND CALL FOR SITES** Thank you for the opportunity to provide formal representations to the Council's Lewisham Local Plan Regulation 18 stage "Main Issues and Preferred Approaches" document (January 2021). **1. About L&Q** L&Q is a regulated charitable housing association and one of the UK's most successful independent social businesses. The L&Q Group houses around 250,000 people in more than 105,000 homes, primarily across London and the South East. As a not-for-profit organisation, L&Q reinvest all the money we make into new and existing homes, creating successful communities and providing excellent services. L&Q have also created a Strategic Partnership Team who work closely with smaller housing association partners and help them deliver new homes on typically smaller sites. **2. L&Q in Lewisham** L&Q is a major provider of homes in Lewisham, currently managing over 7,500 homes across the Borough. We see great potential in Lewisham and currently have new homes under construction at the Excalibur Estate and Timberyard.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
L&Q Group	- -	General Call for site	**6. Future Participation** In summary, we are supportive of LB Lewisham updating its Local Plan to guide development between 2020 - 2040. These amendments to the Draft Local Plan will ensure that the document is more closely aligned with wider London Plan and will assist in the delivery of a wide range of material planning and community benefits across the borough. We look forward to confirmation of receipt of these representations and request the right to be heard by the appointed examiner at the Examination in Public if we choose to participate further.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
L&Q Group	-	Call for site	**5. Lewisham Local Plan - Call for Sites** Alongside these representations on the draft Local Plan, we have also enclosed the requisite forms and associated OS maps for L&Q sites at One King's Hall Mews, SE13 5JQ and Grace Close, SE9 for consideration as part of the Call for Sites exercise by LBL.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
L&Q Group	-	Call for site	*LB Lewisham officer note: a Call for sites submission form and map showing the site boundary are included in the original representation.* Site name and address: One Kings Hall Mews, Lewisham, SE13 5JQ Proposed use(s): Residential dwellings	The call for sites submission for One Kings Hall Mews is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change

L&Q Group	-	Call for site	*LB Lewisham officer note: a Call for sites submission form and map showing the site boundary are included in the original representation.* Site name and address: Vacant land at Grace Close, SE9 (also identified as SA1 Lions Close in Grove Park Neighbourhood Plan). Proposed use(s): Residential dwellings	The call for sites submission for vacant land at Grace Court is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	- -	General Call for site	**LEWISHAM LOCAL PLAN – REGULATION 18 MAIN ISSUES AND PREFERRED APPROACHES CONSULTATION JANUARY 2021** **HUNTSMAN HOUSE AND 10-16 EVELYN STREET** We write on behalf of our client, Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors, to make representations in respect of the London Borough of Lewisham (LBL) Local Plan Regulation 18 Local Plan consultation. Our client owns Huntsman House and 10-16 Evelyn Street, Deptford (the Site). The representations are set out against the headings presented within the Draft Local Plan Regulation 18 consultation version dated January 2021. **Background** The Site is located on Evelyn Street, Deptford, within the administrative authority of LBL. It occupies an area of approximately 1.2 hectares and is currently occupied by a collection of buildings with areas of hardstanding (refer to Figure 1 below). *LB Lewisham officer note: Figure 1: Aerial Image of the Site is included in the original representation. It shows the site boundaries in red.* The Site can be broken down into two parts. Huntsman House comprises an L-shaped detached building that is situated along the western and southern part of the Site. Huntsman House comprises a self-contained warehouse with a two storey brick built ancillary office unit that is set back from Evelyn Street. It is occupied by Constantine. The remainder of the Site comprises a storage and distribution warehouse occupied by Wolseley. Both units have dedicated access points from Evelyn Street. The Site is designated as a Local Employment Location (LEL) by Policy CS3 and Policy DM10 of the Local Plan. The Site does not fall within a Conservation Area and is located in Flood Zone 1 (low risk of flooding). There are no listed buildings in close proximity. The southern corner of the Site is located within a Protected Vista: Wider Setting Consultation Area for the protected view from Blackheath Point to St Paul's Cathedral. The Site is in a location undergoing significant regeneration, which includes several strategic scale developments in close proximity. Most notably this includes Deptford Wharves circa 280 metres to the south east, as well as Convoys Wharf which is circa 630 metres to the south east. Both schemes are under construction and will provide approximately 5,100 homes, as well as employment and town centre uses including retail. This includes tall buildings of up to 40 storeys.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	- -	General Call for site	Our client is now working proactively on proposals to transform the Site into a mixed use development. This work is at the early stages of scheme development and includes establishing a Planning Performance Agreement with the Council in advance of a planning application coming forward. At this stage, initial feasibility work completed identifies a capacity of approximately 250 homes with retained employment use. Detailed technical and environmental assessments will be undertaken in due course to ensure that sufficient evidence is provided to underpin the allocation of the Site in the emerging Plan. This will be fundamental in ensuring the allocation is sound and based on proportionate evidence as sought by the NPPF. The comments in these representations relate specifically to our client's Site and are set out against the relevant policies presented in the Plan.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	- -	General Call for site	Our client looks forward to continuing to engage positively with the Council in the preparation of the Local Plan. We request that we are kept informed of any updates going forward. We would also like to have the right to participate at any oral examination if necessary. If you have any queries regarding this submission, or would like to discuss the proposals further, please contact us.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	-	Call for site	**Closing** Our client welcomes and supports the Council's ambitious strategy set out in its Regulation 18 consultation. In light of the substantial development challenges the Council faces, the acknowledgement that intensification of existing industrial sites will be required is supported. However, we would request that the Council reconsiders its approach to co-location on LSIS land. Specifically we would request that our client's Site is included as an appropriate site for co-location of employment and residential uses. Initial feasibility work indicates that the Site could achieve at least 250 units whilst ensuring no net loss of industrial capacity. Evelyn Street represents a realistic prospect for the delivery of a significant quantum of development that could make a meaningful contribution to the Council's significant housing targets whilst ensuring continued employment use on the Site. This could be achieved early in the Plan period. The development of a masterplan and further environmental assessment will be provided to the Council as the Local Plan develops, to demonstrate that a mixed-use development could be delivered and to underpin a site allocation in the Plan.	The call for site submission for Evelyn Street is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.
Albacore Meeting Room Trust (Lichfields obo)	- -	General Call for site	**Lewisham Local Plan Regulation 18 Stage 'Main Issues and Preferred Approaches', January 2021 Consultation** **Introduction** On behalf of the Albacore Meeting Room Trust ('the Trust'), please find enclosed representations to the above consultation, which has been published for comment until the 11th April 2020. Lichfields act as planning consultant for the Trust which owns the Brethren Meeting Hall site (also known as the Albacore Religious Meeting Rooms), off Beckenham Hill Road (see Figure 2.1, Appendix 1).	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			The 1.47 ha site is broadly rectangular and extends between Beckenham Hill Road (A2015, south) and Sedgehill Road (north). The site comprises a detached, single storey brick building that is centrally located within the site and surrounded by an expanse of asphalt car parking. It is predominantly 'brownfield land', fenced and entirely private. The building has been a place of worship for some 30 years but the building and the site are currently vacant. The site is subject to a live planning application as of November 2020 (DC/20/119014), by applicants Citygate Church, for demolition of the existing single storey religious building at the site and erection of a part two/part three storey building comprising a new church space, together with outdoor amenity space and car parking. It is anticipated that the application will be determined in late Spring 2021.		
Albacore Meeting Room Trust (Lichfields obo)	- -	General Call for site	**Concluding Remarks** We trust that these representations are clear and that they will assist the Council with preparation of its draft Plan. The Trust would welcome the opportunity to discuss the contents of these representations with Council Officers, with the view to removing the site from the MOL and allocating it for flexible community use development in order to meet demonstrable local needs and align with LBL's aspirations for regeneration of the South Area of the Borough. Please can you confirm due receipt of these representations and keep us informed of the ongoing progress with the Local Plan Review. Please do not hesitate to contact us.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Albacore Meeting Room Trust (Lichfields obo)	-	Call for site	*LB Lewisham officer note: Annex 1: Brethren Meeting Hall Site, Beckenham Hill – Lichfields Metropolitan Open Land Review is included in the original representation. It provides an assessment of the contribution the site makes to MOL and the scope for the full release of the land, supported by Appendices 1-5.*	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Albacore Meeting Room Trust (Lichfields obo)	-	Call for site	**Exceptional Circumstances Conclusion and Proposed Allocation** In conclusion, the exceptional circumstances to justify the release of the Brethren Hall site from the MOL are: 1. The site makes a very limited contribution to the purpose of including land within the MOL, as it comprises land which is developed and urban in nature, is private and entirely fenced off and does not include any features of national or metropolitan value; and 2. Its release for replacement and enhancement community use(s) development would: i Help meet the identified need for community facilities in the Borough where there are limited alternative options; ii Do so on an established and sustainable location for a higher quality community facility, utilising the site's location adjacent to Sedgehill School to provide further benefits; and iii Enable the greater optimisation of an underutilised, private brownfield site and an opportunity to provide an area of enhanced landscaping. The proposed allocation plan (Appendix 5 of attached Appendix 1), demonstrates how release of the Brethren Meeting Hall site could work to the benefit of the wider MOL swathe. In particular there is an opportunity for an allocation for Community Use, to enhance the existing site's (absent) contribution to the designated South East London Green Chain by replacing the existing (gated) built	The call for site submission for the Brethren Meeting Hall site is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.

			development and parking with better quality development, and enhanced landscaping. If this were to be publicly accessible; not private, as at present it could improve the permeability east to west and north to south. Accordingly, it is requested that the site should be removed from the MOL and allocated for redevelopment to provide a new 'flexible' community use development, for example, to provide a place of worship / religious use or other community uses such as, health clinics, schools, community centres and public leisure centres (consistent with draft LBL Plan para 9.1 /Glossary 'community facilities').		
Notting Hill Genesis (Savills obo)	- -	General Call for site	**LEWISHAM LOCAL PLAN REGULATION 18 STAGE MAIN ISSUES AND PREFERRED APPROACHES DOCUMENT FORMAL CONSULTATION** **REPRESENTATIONS SUBMITTED ON BEHALF OF NOTTING HILL GENESIS** We are instructed by Notting Hill Genesis (NHG) to submit representations in response to the Lewisham Local Plan Regulation 18 'Main Issues and Preferred Approaches Document' January 2021 ("the draft Local Plan") in the context of their land ownership at 1-25 Malham Road Industrial Estate ("the site"), located within the London Borough of Lewisham (LBL). *Notting Hill Genesis* NHG are a non-profit housing developer, member of the G15 group of major London housing associations and a registered provider of social housing. NHG own and manage more than 65,000 homes in London and the southeast. NHG work in the community, providing homes for around 170,000 people along with social programmes, economic regeneration initiatives and the services and support residents' needs. 627 of these homes are in Lewisham, which are a mixture of Care and Support, General Needs, intermediate tenures and Temporary Housing, NHG are keen to extend their reach within Lewisham and help the Council deliver their strategic goals and housing targets. NHG's primary purpose is to provide homes for lower-income households in and around London. NHG have a record of strategic regeneration across London to deliver high quality market and affordable housing. NHG excel in creating high quality new homes and provide a wide range of housing solutions, working closely with residents and partners to meet local needs. *Site and Planning Policy Context* The site is circa. 0.57 hectares and is bound by Beadnell Road to the west, Dalmain Road to the north, industrial units to the east and Malham Road to the south. The site comprises of five, single storey industrial buildings accessed via a private entrance off Malham Road and accommodates 23 commercial units currently used for light industrial and storage (Use Classes B2 and B8) and office uses (Use Class E, formerly B1). The site forms part of the wider Malham Road Industrial Estate, which is circa 3.63 hectares and accommodates a mix of uses including a place of worship, hot food takeaways and residential uses. The wider area on Beadnell Road and Dalmain Road comprise of predominantly residential uses within two and three storey Victorian terraces. The site is situated in close proximity to Forest Hill District Town Centre, which lies approximately 800m (9 minute walk) south of the site and contains numerous shops, services and community facilities.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			The site has a Public Transport Accessibility Level (PTAL) rating of 2, indicating moderate accessibility to public transport out of a maximum score of 6b. The site is located approximately 800 metres (9 minute walk) from Forest Hill Station, providing access to Southern and London Overground services. There are also a number of bus stops located on A205 Stanstead Road, providing access to Lewisham Shopping Centre and Plumstead. The site is subject to the following adopted (current) planning policy designations: • Forms part of site allocation ref.SA50 Malham Road Local Employment Location; • PTAL 2; • Flood Zone 1; and • The building is not locally or statutorily listed, nor are there any locally or statutorily listed buildings located in the immediate surrounding area. The site is not located within a Conservation Area.		
Notting Hill Genesis (Savills obo)	-	Call for site	*LB Lewisham officer note: Appendix A Plan of the Site is included in the original representation. It shows the site boundary outlined in red.* The site has significant redevelopment potential and we consider it could deliver a mixed use redevelopment comprising new residential uses, including affordable housing and continued use and re-provision of high quality employment floorspace. A 'Call for Sites' form and plan have been completed submitted separately.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Notting Hill Genesis (Savills obo)	-	Call for site	The draft Local Plan should allow a mixed use redevelopment at this site (and potentially the wider Malham Road Industrial Estate) to include the delivery of employment and residential uses. This would incentivise a range of future redevelopment options and would provide a robust approach to withstand current and future challenges. Risks has been exacerbated due to the ongoing period of uncertainty as a result of the potential impacts of Brexit and the COVID-19 pandemic. Given the overall dated status of Malham Road Industrial Estate, a mixed use redevelopment would provide more certainty to support the long-term viability of the site as a successful and sustainable employment location, as well as providing the opportunity to deliver other public benefits e.g. affordable housing. *LB Lewisham officer note: Appendix A Plan of the Site is included in the original representation. It shows the site boundary outlined in red.*	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Notting Hill Genesis (Savills obo)	- -	General Call for site	**Public Examination** On behalf of our client we consider it is necessary to participate in the Examination in Public (EiP) in due course, including attending the oral part of the EiP. We would be grateful if you could keep us updated. **Conclusion and recommendations:** Whilst NHG are generally supportive of the 'spirit' of the draft Local Plan which seeks to improve employment provision and provide new homes and new affordable homes, there are a number policies which require further consideration and updating as elaborated in this letter. The policies mentioned above – primarily the Council's approach to Locally Significant Industrial Sites and the Co-location of residential uses – in their current form the drafting would constrain potential redevelopment options at the site (and potentially to the wider Malham Road Industrial Estate). The draft	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			Local Plan as currently drafted is **not effective** in its delivery, would **not be consistent** with national policy and would **not be consistent** with the London Plan. The draft Local Plan as currently drafted is therefore not sound. However, with further amendments (as noted above), we consider there is the potential that the draft Local Plan could be sound. It is considered that the suggested amendments will allow development to be optimised in the borough and for housing to be delivered ambitiously to meet housing need. To reiterate, the site has significant redevelopment potential and we believe it could provide a mixed use redevelopment comprising new residential uses, including affordable housing and continued use and re-provision of high quality employment floorspace. NHG are committed to working with the Council to help deliver their strategic goals, the regeneration of sites in the borough and benefits to local communities. We would be delighted to also meet with officers and other relevant parties to further discuss the site's opportunities. Please do not hesitate to contact us to arrange a meeting, and/or if you have any further queries. In the meantime we would be grateful if you could keep us updated on the progress of the draft Local Plan.		
Notting Hill Genesis (Savills obo)	-	Call for site	*LB Lewisham officer note: a Call for sites submission form and map showing the site boundary are included in the original representation.* Site name and address: 1-25 Malham Road Inudstrial estate, Lewisham SE23 1AH Proposed use(s): Mixed use redevelopment including industrial uses (Use Class E (formerly B1, B2, B8) and residential uses (Use Class C3).	The call for site submission for 1-25 Malham Road Industrial Estate is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.
Stoken Properties Ltd (Boyer obo)	- -	General Call for site	**Re: Lewisham Call for Sites Application – 491-499 and 501-505 Southend Lane, SE26 5BL** We write on behalf of our client, Stoken Properties Ltd, in response to the Council's Call for Sites exercise as part of the new Local Plan consultation and to support the Council in delivering their spatial strategy. We set out below a brief description of the existing site and its surroundings, the site's planning history and its future development potential. This Call for Sites submission is supported by the following documents: • Site Location Plan; and • Feasibility Study (prepared by Falconer Chester Hall Architects). This Call for Sites submission should be read in conjunction with the representations made in relation to Lewisham's Regulation 18 "Main Issues and Preferred Local Plan Document in respect of Policy EC5 (Locally Significant Industrial Sites) and Section 17 of the Plan – Lewisham's South Area. **Site and Surroundings** Stanton Square comprises an island of land in the Bell Green and Lower Sydenham area of Lewisham, sandwiched between Stanton Way to the south and Southend Lane to the north. Our client's site ("site") comprises a triangular	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			parcel of land of approximately 0.31ha at the northern part of the wider Stanton Square site, fronting onto Southend Lane (please refer to Site Location Plan). Currently the site comprises single storey, dated buildings that were historically in warehouse and industrial use (Use Class B8). The existing buildings are of no architectural merit and are in a dilapidated state, and would need to be brought up to modern standards. The topography of the site slopes upwards from west to east. The site enjoys its own access, separate from other developments within Stanton Square, and is accessed via three dropped kerbs fronting Southend Lane (A2218). Whilst the site has a current PTAL score of 3 it is considered to be in an accessible location due to the close proximity of a number of bus stops and the fact that Lower Sydenham Station is within easy walking distance, approximately 520m to the south east of the site. It is also worth taking into consideration that should the Bakerloo Line Extension be successful, the site will become even more accessible. Abutting the site to the south is the access self storage development which stands at approximately 4.5 storeys tall. Access to the access self storage site is via its own dedicated access fronting Stanton Way to the south. To the south east of the site is the Coventry Scaffolding site, which comprises a 2 storey office building which borders the site to east and behind this, a large yard used for the parking of vehicles and storage of scaffolding materials. On the western side of Stanton Square is The Bell public House, a 2 storey building in retail use by Architectural Salvage and to the west of that building, a modern 3 storey building in residential use. To the north of the site, on the opposite side of Southend Lane is a stepped circular residential development of up to 8 storeys. Also to the north is the large Sainsbury's Savacentre supermarket and associated car park. Haseltine primary school is located to the south of Stanton Square, on the opposite side of Stanton Way. The surrounding area is characterised by a mix of commercial and residential uses. The site is currently designated as a Local Employment Location (LEL) and the majority of the site falls within an Area of Archaeological Priority. The site falls within Flood Zone 1 meaning it has a low probability of flooding. **Planning History** An online search has been undertaken of the Council's planning application database and returned the following results for the site: <u>491-505 Southend Lane</u>		

			An application (Ref: DC/20/116853) for the change of use from B8 (warehouse storage) to a flexible use class between B8 (warehouse storage) and D1 (place of worship) was refused in September 2020. In February 2003 an application (Ref: DC/02/052725/FT) was refused for the display of 2 x 96 sheet partially illuminated advertisement hoarding. However, the subsequent appeal was allowed. An application (Ref: 95/004568) for the display of a 48 sheet free standing hoarding was allowed in May 1995. In March 1993 an application (Ref: 93/036209) for the change of use to a lithographic printing and print finishing unit was submitted. However, it is unknown if this application was approved. <u>Other Sites</u> An application (Ref: DC/17/102967) for the construction of a four-storey building to provide a 8,279 sq.m Self-Storage unit (Use Class B8) and 962 sq.m office space (B1), together with the installation of a 3 metre high security boundary fence, two sliding gates to the front, provision of 16 car-parking bays (including 2 disabled spaces) and 24 secure cycle spaces, refuse and recycling stores and associated landscaping was approved in March 2018. This relates to the adjacent access self storage development to the rear of the site. Prior to the approval of the access self storage development, an application (Ref: DC/16/095614) was approved in June 2016 for the construction of a builders merchants warehouse (B8) (1,200 sq.m) with a mezzanine floor (428 sq.m) to provide ancillary office/staff facilities, a trade area, a covered loading bay at the rear of Stanton Square Industrial Estate, together with the creation of a new vehicular access onto Stanton Way, the provision of 17 parking (including 1 disabled) and 6 cycle spaces, installation of a 3m high security boundary fence, 2 sliding gates to the front, refuse and recycling stores and associated landscaping. A previous application to both the above (Ref: DC/08/070032/X) was granted in November 2008 for the demolition of two buildings and the construction of a four storey, L-shaped building, incorporating fascia translucent panel with illuminated blue LED lighting to the top floor around the building, to provide self-storage (Use Class B8), (floor area 8,897 sq.m) with office facilities (Use Class B1), (floor area 530 sq.m), together with the installation of four metre high boundary fencing and gate to the front, with lights on the perimeters facing downwards and the provision of landscaping, bicycle/bin stores and 16 car parking spaces, including 2 for use by the disabled.		
Stoken Properties Ltd (Boyer obo)	- -	General Call for site	This application has been submitted on behalf of our client, Stoken Properties Ltd. Going forward, I would be grateful if I could be kept updated on the progress of the Local Plan and our Call for Sites application. I would also appreciate being kept updated and informed on any preparation or discussion of a Masterplan for the Bell Green and Lower Sydenham area as this is a process both my client and myself would like to be involved in given my clients interest in the area.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Stoken Properties Ltd (Boyer obo)	- -	General	**Re: Representations to Lewisham's Regulation 18 "Main Issues and Preferred Approaches" Local Plan Document**	Comments supplementary to the call for site	No change.

		Call for site	We write on behalf of our client, Stoken Properties Ltd, in response to the recent publication of Lewisham's Regulation 18 "Main Issues and Preferred Approaches" Local Plan Document. This letter makes representations to the Local Plan and focuses on Policy EC5 (Locally Significant Industrial Sites (LSIS)) and Section 17 – Lewisham's South Area. The letter sets out our client's response to a number of item in the draft Local Plan and provides comment on the relevant policies and allocations. *Introduction* This letter outlines Stoken Properties Ltd. response to the recently published Regulation 18 "Main Issues and Preferred Approaches" Local Plan Document. Stoken Properties Ltd. have an interest in the Stanton Square Locally Significant Industrial Site (LSIS) and policies relating to it, namely Policy EC5. Stoken Properties Ltd are the freehold owners of the northern area of the site identified on the accompanying Site Location Plan, known as 491-499 and 501-505 Southend Lane. At the time of writing, our client is exploring future development opportunities for the site in order to maximise its efficiency and planning potential. It should be noted that the site has also been promoted via the Council's Call for Sites exercise and both representations should be read in conjunction with each other.	submission are noted. Our response is set out below.	
Stoken Properties Ltd (Boyer obo)	- -	General Call for site	*Summary and Conclusions* These representations have been made on behalf of Stoken Properties Ltd. in response to the recent publication of Lewisham's Regulation 18 "Main Issues and Preferred Approaches" Local Plan Document. The document details draft policies, which are intended to guide future development within the London Borough of Lewisham. Whilst we are in general support of the proposed policies we feel clarification and flexibility is required in regards to what is meant by industrial "capacity" and also the requirement for 50 per cent affordable housing if it is unviable and would prevent a site being developed. I trust the above is sufficient in the first instance but should you require any further information or need clarification on any of the points raised, please do not hesitate to contact me.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Stoken Properties Ltd (Boyer obo)	-	Call for site	**Background** Whilst we understand that a separate call for sites application has been made in respect of the adjacent Coventry Scaffolding site, our client wishes to submit a separate application for this site to ensure its planning potential is captured within the Call for Sites exercise and it is promoted for development going forward either as part of a wider application for the entire Stanton Square site or individually.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Stoken Properties Ltd (Boyer obo)	-	Call for site	As advised, this representation is supported with a Call for Sites application for the element of Stanton Square that falls under the ownership of Stoken Properties Ltd., namely 491-499 and 501- 505 Southend Lane. Whilst we are supportive of the overall site's allocation for mixed-use development within the Draft Local Plan, we feel it is important that, especially given the Council's acknowledgement that some development sites will need to be phased, our	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			client's site is considered independently as well as part of the overall Stanton Square site.		
Stoken Properties Ltd (Boyer obo)	-	Call for Site	**Development Potential** Whilst it is encouraging to see the wider Stanton Square site included as an allocation within the Regulation 18 Local Plan, we feel it is important that the subject site is considered individually as well as part of the wider Stanton Square allocation. As the Council have acknowledged, development of the wider Stanton Square allocation may be phased development and so we wish to establish the quantum of development acceptable for the subject site. The site is considered to present an excellent opportunity for redevelopment for the co-location of commercial and residential uses (Use Classes E/B1, B8 and C3) as well as public realm enhancements. The site is deliverable and development could take place relatively soon depending on the site's allocation within the new Local Plan. As demonstrated within the accompanying Feasibility Study prepared by Falconer Chester Hall Architects (FCH), the site can successfully accommodate a high quality, mixed-use development. It is considered that a 6 storey development could be easily accommodated at this location, taking its lead from the heights of surrounding developments. In terms of the commercial floorspace, as depicted within the Feasibility Study, the ground floor can be divided into a number of commercial units to accommodate a number of commercial units and make a much more efficient and sustainable use of the site. As can be seen, any future development of the site could comfortably accommodate circa. 1,700 sq.m of commercial floorspace which would not result in a significant impact on overall capacity and would in fact, create more jobs than currently exist at the site. In terms of the residential element, the Feasibility Study shows that approximately 50 high quality units, which all exceed the national space standards, could be provided on site. These units would benefit from their own access as well as their own dedicated refuse and cycle stores. FCH have shown a scheme that comprises an acceptable unit mix of 40no. 2 bed units, 5no. 1 bed units and 5no. 3 bed units. Whilst it is acknowledged that this is a Call for Sites exercise and not a planning application, nevertheless, the fact that this unit mix, including 5no. family sized units, can be comfortably accommodated at the site should be seen as positive by the Council and the optimal capacity of the site being achieved. In terms of the quality of units, FCH have shown that all units can be designed so as to exceed the national space standards, thus ensuring a good quality of life for future occupiers. Further to this, all units benefit from their own policy compliant level of private amenity space in the form of balconies. As well as private amenity space, proposals can also provide shared amenity space that will have the added benefit of softening the impact of development and providing a better outlook for future occupiers.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			The Feasibility Study shows that the site can successfully accommodate a mixed-use development and that the mix of commercial and residential can work in harmony without detriment to the amenity of either use. The overall height and quantum of development detailed within the Feasibility Study is considered acceptable. At 6 storeys, any future development will fit in well with the surrounding area and would not be considered to be overly dominant or overbearing. Due to the site's good accessibility level, which could increase following the Bakerloo Line Extension, a car free development is considered acceptable at this location and should be supported by planning policy. A mixed-use development comprising commercial uses at ground floor level with residential above is considered appropriate and in line with the Council's wider ambitions for Stanton Square and the Bell Green and Lower Sydenham area. In terms of the quantum of commercial floorspace, whilst we acknowledge and support the Council's ambition that there should be no net loss of employment capacity, we would argue that a well-designed development with appropriate commercial/employment floorspace that, whilst perhaps maybe smaller in overall floor area, can accommodate a greater number of employees, is a more efficient use that does not result in an overall loss of capacity. A flexible and pragmatic approach is required and we provide further comment in our representations to the Regulation 18 Local Plan document. However, as shown in the Feasibility Study a significant amount of commercial floorspace at circa 1,700 sq.m can be provided as part of any future development which is considered acceptable and in line with draft Local Plan Policy EC5. As discussed above, the existing buildings on site are dated and would need to be brought up to modern standards making their refurbishment unviable and impractical. A more efficient and sustainable use of the site would be for its mixed-use redevelopment. Whilst the existing buildings have a large floorspace, they are not considered to be being used efficiently due to the low number of employees at site. With evolving working practices, it is considered that smaller, useable employment floorspace that can accommodate more employees is a much more efficient and sustainable use of space and maximises the development potential of a site. The Feasibility Study therefore shows that any future mixed-use development would not result in a net loss of employment capacity. The Feasibility Study demonstrates that the site at 491-499 and 501-505 Southend Lane can be successfully developed independently from the rest of the Stanton Square site, but in such a way that will not compromise existing operational requirements or future development of the wider Stanton Square site. The site presents an excellent opportunity to help the Council realise its ambitions for the Bell Green and Lower Sydenham area and its development could act as a catalyst for further development. The site should therefore be allocated for mixed-use development in the Council's new Local Plan.		

			Summary Whilst the Council's ambitions for the redevelopment of the entire Stanton Square site are supported, a separate Call for Sites submission for the site at 491-499 and 501-505 Southend Lane has been put forward as the site can be delivered within 5-10 years independently. Whilst the site can be delivered independently, any development of the site would be required to take into consideration how it would fit in with the wider Stanton Square redevelopment when that comes forward. It has been shown that development of the site will not compromise or prejudice either the existing operational requirements of other sites within Stanton Square or the future development of Stanton Square. It is felt that 491-499 and 501-505 Southend Lane can act as a catalyst and facilitator for the regeneration and redevelopment of the wider Stanton Square allocation and will encourage further development to come forward. Not only will the redevelopment and regeneration of this part of Stanton Square encourage the regeneration of the rest of the Square but it should also act as a catalyst for the regeneration of the wider Bell Green/Lower Sydenham area. Its redevelopment will bring significant social and economic benefits to the locality and Lewisham as a whole. The Council, in both draft Local Plan Policy EC5 and the Stanton Square allocation, support co-location of commercial and residential uses provided they would not result in a loss of overall employment capacity at the site. The Feasibility Study has shown that a sensitive mixed-use development that ensures there is no real loss of commercial floorspace whilst delivering high quality residential accommodation is achievable at the site and would make a much more efficient use of a site in an accessible and sustainable location. The site at 491-499 and 501-505 Southend Lane meets all the criteria the Council listed in its Call for Sites exercise. The site is over 0.25ha, could easily accommodate more than 10 residential units and more than 500 sq.m commercial floorspace and is in an accessible location as well as being located within an area that has been earmarked for regeneration, namely the Bell Green and Lower Sydenham Area. It is worth confirming that the site owner is very keen to work with the Council to bring the site forward and would welcome the opportunity to be involved in the preparation of a masterplan. I trust the above is sufficient in the first instance but should you require any further information or need clarification on any of the points raised, please do not hesitate to contact me.		
Stoken Properties Ltd (Boyer obo)	-	Call for site	*LB Lewisham officer note: a Call for sites submission form, site feasibility study and site location plan showing the site boundary are included in the original representation.* Site name and address: 491-499 and 501-505 Southend Lane, SE26 5BL Proposed use(s): Mixed use comprising commercial/office (Class E/B1), warehouse/storage (B8) and residential uses (C3).	The call for sites submission for 491-499 and 501- 505 Southend Lane is noted. There is no need for an individual site allocation on this site as it is already included in the Stanton Square LSIS site allocation. It also recognises that	No change.

				development must be delivered in accordance with a site masterplan to ensure the appropriate colocation of employment and other uses across the site. Comments to additional representations are set out elsewhere in the Consultation Statement.	
Freeths LLP (K/S Lewisham obo)	-	Call for Site	*LB Lewisham officer note: a Call for sites submission form is included in the original representation.* Site name and address: 150-154 Lewisham High Street, SE15 6JL Proposed use(s): replacement retail use and residential. We act on behalf of K/S Lewisham ("K/S") and have been instructed to submit the following representation to the Local Plan consultation. This is in the context of a site known as 150-154 Lewisham High Street which is under their freehold control and management. *LB Lewisham officer note: Appendix 1: the extent of the site is included in the original representation.*	The call for sites submission for 150-154 Lewisham High Street is noted. There is no need for an individual site allocation on this site as it is already included in the Lewisham Shopping Centre site allocation. Further comments to additional representations are set out in the Lewisham Shopping Centre site allocation above.	No change.
Kier Property (Carter Jonas obo)	- -	General Call for site	**LAND SURROUNDING THE LIVESEY MEMORIAL HALL, BELL GREEN, SYDENHAM** Carter Jonas on behalf of our client Kier Property, welcomes the opportunity to submit representations to the Lewisham Local Plan Regulation 18 stage "Main Issues and Preferred Approaches" document. Our client supports the preparation of the Local Plan and welcomes the proposed strategy for utilising land at Bell Green for alternative uses. In particular, the strategic and longer-term aspiration for Bell Green Retail Park's contribution towards a residential-led mixed-use development.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Kier Property (Carter Jonas obo)	-	General Call for site	Kier Property can confirm the availability of its redundant landholding known as Land to the rear of the Livesey Memorial Hall in its ability to contribute towards the Council's growth strategy. The accompanying Site Location Plan identifies the extent of the land outlined in red comprising land to the north and east of the former Bell Green Gasholders, the Livesey Memorial Hall and its land to the north and south of this building. The land outlined in blue represents a long-term freehold for Kier Property. These representations relate specifically to the land outlined in red. *LB Lewisham officer note: a site location plan showing the site boundary is included in the original representation.* Our client requests that the land is formally identified for redevelopment as part of wider Bell Green redevelopment proposals where there is a clear and unequivocal relationship between the Site and the regeneration opportunity for a long term residential-led development.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			For the avoidance of doubt, our client's land ownership includes the Grade II Livesey Memorial Hall. Kier Property recognises the importance of this heritage asset to the character of the surrounding area and it is not the intention to propose the building for redevelopment. These representations promote the residual and dilapidating surrounding land of the Livesey Memorial Hall, which in the interests of proper planning should be included as part of the wider Bell Green strategic allocation area. In this regard, with the inclusion of our client's land in the wider site, we support the Council's vision in the context of a wider placemaking area around Bell Green.		
Kier Property (Carter Jonas obo)	- -	General Call for site	**Site Background** The Site is accessed via the existing Bell Green retail park located off Perry Hill, to the north of the former Bell Green Gas Works site. In the context of its surroundings, the residual land surrounding the Livesey Memorial Hall lies vacant, slowly falling into disrepair as a result. It is unsightly and overgrown but has potential to contribute to the Council's requirement for residential homes. The Bell Green Gasholders shown on the plans have recently been removed by Southern Gas Network and the site forms part of Site Allocation 1 The Former Bell Green Gasholders. The principle of development on the Site is supported both at national, regional and local level. The Site, by virtue of its previously developed nature would support the rhetoric to make the most efficient use of brownfield land.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Kier Property (Carter Jonas obo)	- -	General Call for site	**Strategic Matters** In line with national policy, there are a number of strategic matters that are identified in the draft Local Plan which are relevant to the future determination of the most deliverable and sustainable options of the Borough. A key matter of which, is the extent of the housing needs arising in the Borough. In simple terms it is the responsibility of the Council to plan to meet it over the plan period. The NPPF also states the Government's commitment to ensuring the planning system does *everything it can* to support sustainable growth. We are pleased to see that progress has been made on the Council's evidence base that supports the identification of key growth opportunities on brownfield land, in parallel with key infrastructure delivery. An up-to-date evidence base should provide a sound basis for the plan and consultation on its content will help ensure local communities and other interested parties are aware of the issues considered by the Council in the preparation of a Local Plan. Ultimately the delivery of early and well-designed new homes for the Borough's growing population must, and can be achieved in this plan period. A 'new' London Plan was recently published by the Mayor of London and provides a number of strategic considerations for the Council to grapple with. The current Local Plan consultation document was produced prior to its publication and therefore any relevant matters drafted into the final London Plan should be accommodated and consulted upon in the next consultation opportunity.	Comments supplementary to the call for site submission are noted. Our response is set out below.	Local Plan amended to accord with the adopted version of the London Plan.

Kier Property (Carter Jonas obo)	- -	General Call for site	Thank you once again for the opportunity to respond to the Local Plan consultation. We would be grateful for confirmation that these representations have been received and confirm that we would like to be involved in future stages of the Local Plan process.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Kier Property (Carter Jonas obo)	-	Call for site	We consider that the site is well located to contribute towards the vision outlined by the wider Bell Green site allocations and therefore should be considered for inclusion within their boundary. Specifically, against the site allocation objectives and development guidelines, the site is: • Capable of being available, constraint free and deliverable in the short term; • Capable of contributing towards delivering a high-quality development whilst offsetting any perceived harm to the Grade II Livesey Memorial Hall. • Provides the potential to increase the density on site to deliver a cohesive high quality residential and mixed-use development; • Contribute toward wider placemaking objectives and the Council's promotion of the wider Bell Green area as an Opportunity Area in the next review of the London Plan; • It is well located adjacent to an existing settlement with associated services and facilities – it is a key transition site from the entrance of the Bell Green Retail Park to the longer term development across the site. **Summary** In summary, these representations confirm that the land to the rear of the Livesey Memorial Hall, Bell Green can be considered for inclusion within the wider Site Allocations at the Bell Green Retail Park. Kier Group would welcome the allocation of their landholdings as it relates to Bell Green, to allow for a comprehensive development and allow for a broader range of uses. The site allocation's location within the Bell Green area would allow for this site to act as a catalyst for regeneration of the wider area and the early delivery timeframe is supported.	The call for site submission for Livesey Memorial Hall is noted. Agree that there is merit in including this site within the Former Bell Green Gas Holder site allocation. The site's capacity takes into account the need to protect the setting of the Grade II Livesey Memorial Hall and retain the openness of the bowling green and tennis courts.	The former Bell Green Gas Holder site allocation has been amended to include the site of the Livesey Memorial Hall.
Austringer Capital Ltd (Tetlow King Planning obo)	- -	General Call for site	**Introduction** **Section 1** 1.1 These representations are made by Austringer Capital Ltd in respect of the Regulation 18 Issues and Options consultation on the emerging Lewisham Local Plan. We welcome this opportunity to comment on the emerging strategy and policies. 1.2 Austringer Capital Ltd has development interests at the former Willow Tree Riding Establishment, Ronver Road, Hither Green. The site comprises 5.6 hectares of land, historically owned by British Rail in connection with the Channel Tunnel rail link. A riding establishment operated from the 1950s to 2015 and a proposal for replacement riding facilities is presently subject to a planning appeal. 1.3 At present, the site is disused, heavily overgrown, and subject to misuse including trespass, vandalism and fly-tipping. Through the Local Plan process, there is the opportunity to allocate the site for development, to ensure the site can be returned to beneficial use and to provide for the long term management	Comments -supplementary to the call for site submission are noted. Our response is set out below.	No change.

			and maintenance of the site. The site comes forward in a sensitive planning context, which has informed the development options for the site. 1.4 These representations are structured as follows: • Section 2 discusses the site and the key planning issues including site constraints and opportunities; • Section 3 discusses the potential uses of the site; • Section 4 provides comments on specific policies in the Plan.		
Austringer Capital Ltd (Tetlow King Planning obo)	-	General Call for site	**The Site** **Section 2** 2.1 The site comprises 5.6 hectares of land forming a long narrow strip between extensive residential development to the east, and the South Eastern Main Line railway to the west. *LB Lewisham officer note: Figure 2.1: Site Location Plan is included in the original representation.* 2.2 The site is largely undeveloped, save for an equestrian stable accessed from Ronver Road (disused since 2015) and other small structures found across the site. There are areas of hardstanding, paddock and scrubland throughout the site. Certain areas are heavily treed with some of the trees being subject to an area-wide Tree Preservation Order. There are areas of Japanese Knotweed, an invasive species, towards the north of the site. 2.3 Historically, the site was owned by British Rail ("BR") and featured in early plans for the Channel Tunnel Rail Link. These plans were abandoned by BR in the 1990s and the site then remained undeveloped (save for the riding establishment). 2.4 Unfortunately, with the site being disused for several years, it has fallen into a state of degradation and is subject to vandalism, trespass and fly-tipping. Extant buildings and structures are in a poor condition. In order to secure the future maintenance and management of the site, it is Austringer Capital's case that the site should be brought back into use. Doing nothing is not an option, since the site will continue to be misused and will continue to deteriorate. 2.5 The site has historically been in equestrian use, with the former Willow Tree Riding Establishment operating from the 1950s until its closure in 2015. In recent years, permission has been sought for a new equestrian facility: • An application for development of "*erection of private stables, removal of trees and laying out of 3 no. paddocks*" (DC/13/83518) was dismissed on appeal in 2014. Key concerns raised by the Inspector related to uncertain impacts in relation to biodiversity and trees at the site. The Inspector considered that the proposed built form was compatible with the Metropolitan Open Land designation at the site; that there would be no unacceptable adverse impact on residential amenity; and that the proposed development was acceptable in principle. Taking a precautionary approach the Inspector dismissed the appeal.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			• A application for a revised scheme of "*Demolition of the existing stables and the construction of new equestrian facilities to include stalls, a barn shelter, tack building, reception/office, and a perimeter track for riding, at Willow Tree Riding Establishment Ronver Road SE12, together with use of the existing access onto Ronver Road and associated works*" (DC/19/111719) sought to respond to the issues raised through the previous appeal. The application was refused with four reasons for refusal, relating to an alleged urbanising impact upon the Metropolitan Open Land designation, loss of trees that detract from the Tree Preservation Order and the MOL designation, the internal highways and pedestrian layout, and amenity impacts upon adjacent dwellings. It is Austringer Capital Ltd's case that the proposed development is acceptable in these respects. The scheme is currently the subject of a live planning appeal which is due to be heard in Summer 2021. **Site constraints** 2.6 The site is subject to several constraints, which include: • Designation as Metropolitan Open Land ("MOL"); • Designation as a Site of Importance for Nature Conservation of boroughwide significance (reference LeB29); • Designated at its northernmost extent as an Urban Open Space subject to policy CS12 in the current Core Strategy; • An area Tree Preservation Order, made in 2012; • Noise arising from the adjacent operational railway. 2.7 These key site issues are discussed below. **Metropolitan Open Land** 2.8 Adopted London Plan policy 7.17 'Metropolitan Open Land' sets out the policy approach to Metropolitan Open Land. It continues the longstanding approach that MOL benefits from the same level of policy protection as Green Belt, albeit that the functions of MOL are different. Policy 7.17 explains that inappropriate development should be refused except in very special circumstances. 2.9 Policy 7.17 lists the criteria for designation of MOL: • it contributes to the physical structure of London by being clearly distinguishable from the built up area; • it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London; • it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value; • it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria 2.10 The site's status as Metropolitan Open Land was re-appraised in 2020 as part of a Metropolitan Open Land Review undertaken by Arup (the "MOL Review"). The site is identified as part of 'MOL Area 6'; the Area Assessment		

			Summary shows the site either performs 'weak-moderate' or 'moderate' against the assessment criteria, however the land is recommended for retention as part of the MOL. 2.11 The Annex Report to the MOL Review explains how these conclusions were reached, noting that the strongest contribution was found to be to the first criterion, as the site is heavily vegetated and contributes to the overall structure of built form. The site performed weakly in terms of the second and third criteria, due to the lack of public access; it is stated to be of "*no value to the local community*". The site performed better in terms of the fourth criterion in light of other nearby green infrastructure connections. 2.12 In light of the MOL Review's recommendations, Austringer Capital recognises that any development of the site must come forward in accordance with the MOL policy designation. This has a significant bearing upon the proposals for the site, which seek to maintain the openness of the site, remain compatible with the MOL designation, with only limited built form. **Ecology** 2.13 The site is designated a SINC of boroughwide importance. The site forms part of the Hither Green Sidings SINC, which includes other adjacent parcels of land including that within the ownership of Network Rail. 2.14 The 'Re-survey of Sites of Importance for Nature Conservation in Lewisham' was undertaken by the Council in 2016 and includes a habitat map of the site. This shows there to be large areas of scrubland, roughland, with smaller pockets of native woodland, a pond, tall herbs, and semi-improved neutral grassland. There are also areas of soil, rock and artificial habitat centred around the former equestrian centre. 2.15 The SINC designation was reviewed by the Council in late 2021. The report is informed by a site visit of the Network Rail land. It finds that whilst there has been an increase in the biodiversity value of the site since the previous survey in 2016, it remains the case that the site does not fulfil the necessary criteria to be upgraded to a Site of Metropolitan Importance. 2.16 Austringer Capital is aware that there are objections to the current appeal scheme on ecology grounds. It is important to note that the SINC designation is not a blanket restriction on all development. Policy G6 of the London Plan 2021 requires that "*Sites of Importance for Nature Conservation (SINCs) should be protected*" and as such requires any development proposals to avoid harm to the biodiversity of SINCs (but where harm is unavoidable, to apply a hierarchy of mitigation). The current appeal is not subject to an ecology reason for refusal and the Council is satisfied that the matter can be addressed by way of condition. 2.17 Overall, it is considered that ecological matters are an important constraint that must be factored into any scheme design, but that it is possible for development to come forward that preserves and enhances the main areas of ecological value in accordance with the SINC designation. **Trees**		

			2.18 The site is subject to an area TPO, made in 2012. Area TPOs are frequently used to protect a large number of trees quickly and the Council is legally obliged to undertake a full assessment of the trees and groups covered by the order. The Area TPO may include trees which do not merit protection, and new trees and growth may make it difficult to establish which trees are actually protected under the TPO. It is therefore considered that a scheme design can come forward which respects and enhances high quality trees at the site, and that the TPO designation must be considered in the context of the above caveats. **Open space designations** 2.19 The site is subject to existing and proposed Open Space designations. Under the emerging Local Plan, the site is considered under policy GR2 'Open Space and Lewisham's Green Grid' however Green Infrastructure and open spaces also form part of the broader spatial strategy for the East Area of Lewisham. **Opportunities for the site** 2.20 The opportunities for the site are heavily influenced by these constraints, which require a careful approach to be taken to any scheme design. Opportunities include: • Restoring the site to beneficial use; • Protecting and enhancing the areas of acknowledged biodiversity importance; and • Provision of foot and cycle links throughout the site, achieving local objectives (set out in the emerging Grove Park Neighbourhood Plan) to provide a 'linear parkland' throughout the neighbourhood. **Restoring the site to beneficial use** 2.21 The primary aspiration is to bring the site back into beneficial use. In common with other London Boroughs, there are relatively few opportunities to bring development forward on sites of any significant scale. The National Planning Policy Framework emphasises the efficient use of land. With a limited supply of land in the Borough, It serves nobody's purpose to leave sites such as this undeveloped. Conversely, there is the opportunity to deliver development that positively meets needs of the Borough's growing population. The Local Plan is the key mechanism by which the Council can identify land for future use and an allocation of this site will ensure that the site can contribute to the overall success of the Borough. 2.22 Development is also necessary to secure the site's ongoing management and maintenance. At present the site is blighted by vandalism, fly-tipping and general degradation despite the efforts of the landowner to prevent this. Whilst there is no public access to the land, there have been numerous issues of trespass and break-ins to the site. It is an unfortunate fact that any site of this nature in this location will be susceptible to misuse and whilst efforts are made to secure the site, a determined individual may try to circumvent these measures. It is considered that a regular staff presence at the site and a proper management and maintenance regime will substantially reduce instances of trespass and misuse of the site. **Protecting and enhancing biodiversity**		

			2.23 Development at the site offers the potential to achieve net gains in biodiversity. The Council's own evidence base shows that whilst there are areas of habitat value within the site, these do not extend to the entire site area. There are, for example, areas of hardstanding. Existing habitats on site including dense scrub, woodland and open mosaic habitat provide opportunities for enhanced biodiversity through carefully considered management. 2.24 Bringing development forward at the site would allow for a proper landscape and ecological management plan to be secured, with clear measures and objectives to secure biodiversity improvements.		
Austringer Capital Ltd (Tetlow King Planning obo)	-	General Call for site	Development Options Section 3 3.1 The site constraints and opportunities have informed Austringer Capital's aspirations and vision for the site. Any development must respond to the constraints on the site, chief amongst which are MOL, ecological and arboricultural considerations. This limits the potential for extensive built redevelopment of the site, but there is clear scope for a predominantly outdoor use to come forward where this preserves the open characteristics of this part of the MOL and responds to the other site constraints and opportunities as identified above. 3.2 Three options are therefore proposed: • Provision of a modern riding establishment; • An alternative leisure use; or • Delivery of a combined cemetery and community use. **Riding establishment** 3.3 The site has been historically used for equestrian purposes and the current appeal scheme proposes a significantly upgraded equestrian facility. The submitted scheme allows for the provision of parking, access and new buildings concentrated around the footprint of the existing hardstanding and buildings. A perimeter track is proposed to run in a loop through much of the site. Existing high quality trees are to be protected and incorporated into the scheme design. 3.4 The proposed riding establishment is compatible with the MOL designation. Paragraph 145b of the Framework allows for the provision of appropriate facilities for outdoor sport and recreation and through the appeal the Council has not objected to the principle of the development. 3.5 The proposed riding establishment offers opportunities for biodiversity net gains to be achieved. As discussed in section 2, although the site is subject to a SINC designation covering the wider Hither Green Sidings, certain parts of the site are of limited ecological value. Development of a riding establishment allows large areas of the site to be retained, enhanced and properly managed for ecological value and improved biodiversity, offering greater ecological connectivity across local SINCs.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			3.6 Through the appeal process Austringer Capital has set out the need for the proposed equestrian use. There are two riding establishments within 1.5km; New Lodge Farm which provides specialist riding facilities for adults and children with disabilities, physical, sensory and learning difficulties; and Mottingham Farm Riding Centre which serves the general public. At the time of writing, it advertised only two available livery spaces out of a total of 44. 3.7 The extant structures at the site were built many years ago and are in a poor condition, unsuitable for retention or re-use. The expectations of customers have changed over time, with the proposed new facilities including modern stables and a barn shelter, formalised car parking, a reception and office building, a picnic area, and a trackway running throughout the site. Taken together, the proposed equestrian use would offer improved facilities from those extant at the site. 3.8 Emerging policy CI2 'New and Enhanced Community Infrastructure' supports the provision of new and reconfigured community facilities, where they are suitably located, where the development proposals are flexible, functional, available to the public, and appropriately managed, with no other significant adverse effects on neighbouring uses. In this context, paragraph 9.8 of the emerging Local Plan's supporting text states that "*Community infrastructure is vital to securing inclusive communities and to meeting the needs of different groups within the Borough. We will therefore be broadly supportive of proposals involving new or enhanced provision*". 3.9 There is a demand for equestrian uses in the area and little spare capacity in existing facilities. The delivery of a modern riding establishment, designed to meet present-day needs and built to present-day standards, would be entirely consistent with the objectives of policy CI2. There is also the opportunity to secure proper long-term management at the site including in respect of ecology and general maintenance of the site. 3.10 Paragraph 9.8 of the supporting text to emerging policy CI2 emphasises that the location of community facilities should be suitable for the community and groups that they serve. In this case, the site benefits from good access to road (with easy access to the South Circular Road) and public transport networks (including London Buses and National Rail) in the context of its suburban location away from the identified district centres. 3.11 In terms of the spatial strategy, the proposed riding establishment is consistent with the vision for the East Area of Lewisham. Paragraph 16.6 of the emerging Local Plan emphasises the importance of quality parks, open spaces and green infrastructure in the East Area (discussed further at Section 4 of these representations). The proposed riding establishment allows for the site to remain open (in accordance with MOL policy) and can provide for proper management and maintenance of the site, to ensure that ecological interests can be protected and enhanced. 3.12 Drawing the above together, there is a clear case that the Willow Tree Riding Establishment site is suitable for equestrian use and that emerging policy should support the provision of enhanced, modern facilities at the site. Whilst		

			the appeal is currently considering site-specific technical matters and the design approach, it is clear that, in principle, the site is suitable for equestrian use. **Alternative leisure uses** 3.13 Whilst the proposed equestrian use benefits from extensive design work and is currently being considered through the planning appeals process, there may be potential for an alternative outdoor-led leisure use. This may be explored further through the Local Plan process. **Cemetery use** 3.14 There is a need for additional burial space in the London Borough of Lewisham. The most recent evidence base document for burial space requirements is the Audit of London Burial Provision prepared in 2011 by the Greater London Authority. For Lewisham, it notes that there are four cemeteries in total in the Borough, one of which is owned and operated by the London Borough of Bromley. At the time of the audit, it was estimated that there were around 56 years' worth of burial capacity. However, some of the data in the audit such as burial rates date as far back as 1995. There are also limitations to the methodology in the audit, which notes at paragraph 2.31 that "*it becomes very difficult for a cemetery owner to make an accurate assessment of exactly how many grave spaces may be available in an existing cemetery. It is for this reason that the final assessment of the amount of space available in a given borough is very much an estimate, and depends on cemetery managers' largely qualitative reporting and their understanding of which grave creation measures may release further space, and which measures have been exhausted or are not viable*". 3.15 Since the evidence base for cemetery requirements is dated, we have sought up-to-date information through a Freedom of Information request ("FoI") provided at **Appendix 2**. *LB Lewisham officer note: Appendix 2 FOI response is included in Appendix 2 in the original representation.* 3.16 Information was sought for the number of burials on an annualised basis between 2011/12 (the time of the GLA audit) and 2019/20 although data was only available for two of these years. In 2019/20 a total of 527 burials were recorded. 3.17 Information was sought for 2020/21 to understand whether the COVID-19 pandemic has affected the rates of burials. All three cemeteries saw an increase in the year 2020/21 to date when compared with the previous year. In total 582 burials have been undertaken, a 10% increase against the previous year. 3.18 Details of capacity in existing cemeteries were also sought: 3.19 In total, there are around 2,050 remaining spaces, of which 1,250 are currently available and a further 800 require further investment to bring into use. 3.20 With 527 burials recorded in 2019/20 across all three of Lewisham's cemeteries, there are currently only enough spaces to meet 3.9 years' worth of demand. The availability of burial space is therefore substantially less than was		

			estimated in the GLA Audit, and points to a significant need for new burial space in the Borough over the course of the emerging Local Plan period. 3.21 It is therefore necessary to provide additional burial plots in the Borough. Emerging Local Plan policy CI5 makes provision for this and explains that the Council intends to update its evidence base in this respect. The Local Plan process is an opportunity for the Council to make proper long-term provision for burial spaces. The former Willow Tree Riding Establishment site offers the potential to provide a cemetery that is well-located in relation to the community it serves, being close to both the long-established Hither Green and Grove Park cemeteries. Such an approach remains consistent with emerging policy CI3. 3.22 Cemetery uses are compatible with Metropolitan Open Land designation. There are several instances where cemetery proposals have been considered, including at appeal, within the Green Belt, and have been found to be acceptable. 3.23 Site specific benefits of providing a cemetery at the former Willow Tree Riding Establishment site include: • Proximity to existing cemeteries and associated facilities such as chapels of rest and the Crematorium at Hither Green; • The ability to secure biodiversity enhancements at the site, identifying those areas of greatest ecological value and securing their long term management and maintenance; • Provision of well-maintained open spaces for quiet contemplation; • Maintaining a predominantly open site with vegetation throughout as part of the wider network of Green Infrastructure identified in the emerging Lewisham Local Plan as well as the published London Plan; • Provision of footpath links as part of a 'linear park'. 3.24 Access for vehicles via the South Circular Road; positive pre-application advice has been received from Transport for London that confirms that in principle, this access is acceptable. 3.25 Initial design work for the site has been undertaken which indicates a potential capacity of up to 6,700 burial plots whilst retaining the trees at the site of greatest arboricultural value and maintaining a planted buffer to the adjacent railway and dwelling houses. This is subject to refinement through the design process. A capacity of 6,700 plots would provide an additional 13 years' capacity assuming a burial rate of 527 per annum.		
Austringer Capital Ltd (Tetlow King Planning obo)	-	General Call for site	**Summary and Conclusion** **Section 5** 5.1 These representations are made by Austringer Capital Ltd in respect of the Regulation 18 Issues and Options consultation on the emerging Lewisham Local	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			Plan. We welcome this opportunity to comment on the emerging strategy and policies. Austringer Capital Ltd has interests at the former Willow Tree Riding Establishment, Ronver Road, Lewisham. 5.2 The site measures some 5.6 hectares and has suffered from degradation since the closure of the previous riding establishment in 2015. The Local Plan presents the opportunity to allocate the site, to restore it to beneficial use. 5.3 It is necessary to carefully consider the constraints at the site, which include Metropolitan Open Land, Site of Interest for Nature Conservation designations, and arboricultural interests. These are not 'blanket' restrictions on any form of development; they can be addressed through an appropriate scheme design. 5.4 Moreover, it is possible to achieve meaningful benefits through development at the site, including the long-term management and maintenance of the site (including in respect of ecology and trees); restoring the site to use; the ongoing contribution of the site towards Green Infrastructure, and the potential to provide foot and cycle links dependent upon the scheme design. Emerging policies LEA4 and LEA5 contemplate the ability of some development to support wider objectives in respect of open spaces and community provision. 5.5 We have proposed three potential uses at the site; equestrian use, an alternative outdoor leisure use, and a cemetery use. The proposed uses would help to meet local needs and are consistent with the site constraints, opportunities and the broader spatial strategy for the East Area of Lewisham. We would welcome the opportunity to discuss these in further detail with the Council as the Local Plan progresses.		
Austringer Capital Ltd (Tetlow King Planning obo)	- -	General Call for site	We welcome the opportunity to discuss the content of these representations further with the London Borough of Lewisham and are keen to be involved in the forthcoming examination process. In the meantime, should you wish to discuss any of the above please do not hesitate to contact us.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Austringer Capital Ltd (Tetlow King Planning obo)	-	Call for site	*LB Lewisham officer note: Call for Sites form is included in Appendix 1 in the original representation.* Site name and address: Willow Tree Riding Establishment, Ronver Road, London, SE12 0NL Proposed use(s): Retention of riding establishment use; or alternative outdoor leisure use; or Cemetery use.	The call for sites submission for Willow Tree Riding Establishment is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.
Big Yellow Storage Company Limited (DWD obo)	-	General Call for sites	**LEWISHAM LOCAL PLAN: MAIN ISSUES AND PREFERRED APPROACHES (JANUARY 2021) -** **REGULATION 18 CONSULTATION** **REPRESENTATIONS ON BEHALF OF BIG YELLOW GROUP PLC** These representations are submitted on behalf of our client, .Big Yellow Self Storage Company Limited ("Big Yellow") to Lewisham Council's consultation document 'Lewisham Local Plan: Main Issues and Preferred Approaches (January 2021)' ('draft consultation document').	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			Big Yellow owns the freehold interest of the land at 155 Lewisham Way, New Cross, London SE14 6QP ("the Site") as shown on the appended map (Appendix A). *LB Lewisham officer note: Appendix A: Map of 155 Lewisham Way is included in the original representation. The plan shows the site boundary in red.* These representations relate to the Site and the 'employment land' chapter of the consultation document, as well as the proposed changes to the adopted policies map.		
Big Yellow Storage Company Limited (DWD obo)	- -	General Call for Site	I trust that the information provided clearly sets out Big Yellow's position with regard to Lewisham's new Local Plan. Please do not hesitate to contact me if any further clarification is required on the above. I would be grateful if you could please confirm receipt of these representations and keep me informed of any further consultations moving forward.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Big Yellow Storage Company Limited (DWD obo)	-	Call for site	**Site and Surrounding Area** The Site is located within the boundary of Lewisham Council and extends to an area of approximately 0.46 hectares, located on the north-eastern side of Lewisham Way. The Site is occupied by a Big Yellow self-storage facility which fronts Lewisham Way, and a smaller building set back from the main road which is occupied by a number of industrial / commercial uses. Both buildings are accessed from Alexandra Cottages and have associated service yards and parking areas. **Current Policy Position** Within the adopted policies map the Site is located within the Lewisham Way Local Employment Location (LEL) which is one of 12 designated LELs within the Borough. In policy terms, LELs are protected for a range of uses within the B Use Class (B1, B8 and where appropriate B2 industry) and also appropriate sui generis uses, to support the functioning of the local economy. This policy protects the Site for continued industrial use, including for self-storage purposes (Class B8). **Bakerloo Line Extension** It is noted that the Bakerloo Line Extension safeguarding plans recently issued by Transport for London (TfL) safeguard the entire Site within an 'area of surface interest' for a new shaft. It is not known at this point whether all, some or none of the Site will be required for the BLE. Therefore any area that is not used or, indeed, once it has been used and is no longer required for the BLE, could come forward for employment development in the plan period.	The call for sites submission for Big Yellow Storage Facility at 122 Lewisham Way is noted. This site is currently safeguarded for the BLE. This site may be considered through a plan review in due course, once there is certainty over the delivery timescales for the BLE and the exact land take for the BLE shaft is known.	No change.
Southern Gas Networks	-	General Call for sites	After reviewing the Draft Local Plan and the section in the IDP specifically about SGN, I have no comments I wish to make at this time. That being said, I would like to offer our future support, especially after the Call for Sites has ended and a decision has been made on which sites are acceptable. If it benefits the council, I would be happy to analyse the impact of all potential Lewisham sites on the SGN gas network and provide a summary of my findings. I look forward to hearing from the council in the future.	Comments noted.	No change.

Lewisham Local Plan

Regulation 18 consultation statement

Appendix 3 – Regulation 18 Draft Local Plan Commonplace Responses Part 1

September 2022

Part	Section, policy or paragraph	Respondent submission	No. of agreements	Council officer response	Action
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** I wish there was a more direct line through to the details of the plan for those who want to skip the preamble of how it's been formulated... quite time consuming.	0	The Commonplace website was organised around the main Parts and policy topic areas in the plan. It also separated the plan into separate downloadable sections. The full draft Local Plan has been desktop published with embedded hyperlinks that allow readers to navigate quickly to different sections of the documents. This feature will be retained in the Regulation 19 document.	Hyperlinks are included in the document for ease of navigation. The Local Plan has been reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan has also been prepared.
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** Since I cannot find another appropriate place to comment on the form of this consultation I will place it here: - At 870 pages how do you expect the general public to make informed contributions to the plan? The summary is so	0	The length of the draft plan reflects that it will update and consolidate 4 adopted plans into a single document. As part of the Regulation 18 consultation we prepared a high level summary. We are sorry	The Local Plan has been reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan has also been prepared.

		high-level that it is not very helpful. The important bits are often in the details. - The wording of the plan is unnecessarily verbose and repetitive: For those who compose tomes like this professionally it might make sense but it does not serve the local community. - Many parts of the plans are formulated as aspirations and not as absolute requirements, e.g. prevention of loss of green space, types of heating, etc. Every part has get-out clauses and exceptions which will be abused when it comes to the stage where a design proposal requires approval. - The plan often uses vague wording that are subjective in their interpretation: "sensitive", "sustainable", "high quality design", etc. These terms, of course, cannot be clearly defined. They mean whatever the person uttering them wants them to mean. A member of the development team of the Lewisham Gateway told me that the high-rise buildings there were of high quality design		that you didn't find this helpful but we have had many positive feedback on this approach. The Local Plan is a policy document which is used to assess planning applications and will be scrutinised legally in the case of any appeals in the future. It is therefore necessary that the language is professional and robust. The terms are all recognised terms used in planning policy documents, guidance and SPDs. These terms are outlined in the National Planning Policy Framework and have been tested through the legal processes.	
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** Its clearly described as a statutory process that is required by law	0	The Regulation 18 consultation was carried out in accordance with the Council's adopted Statement of Community Involvement. The consultation period was	No change.

				well in excess of the legal minimum 6-week period.	
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** The aspirations outlined in Part 1 of the plan sound all good. I'm much more worried about their realisation and how much of the aspirations (greener environment, better transport, tackling deprivation, diverse culture, sensitive development) will survive the contact with real life developers. The target of ~1600 housing units per year is an imposition from the London Plan. Why would we need to accept this and in consequence have a very high density of housing units with the required high rise buildings when other boroughs get away much more lightly (e.g. Richmond ~300 units / year) ? The identified opportunities for development could also be used to create more green spaces, communal areas, etc., instead of an intensified housing block, so that Lewisham could become an as pleasant borough as Richmond. Why should the distribution of green spaces and character of area remain fixed as it was defined over the last 200 years, i.e. Richmond: low density, lots of green spaces, low rise buildings vs Lewisham: high density, change from low rise to high rise over the last 15 years, decent amount of green spaces ? Or are	0	The Local Plan is legally required to be consistent with the National Planning Policy Framework and in general conformity with the London Plan. Lewisham like all London Boroughs is facing a Housing Crisis and needs to build many more homes. Particularly genuinely affordable homes. The London Plan set Lewisham a Housing Target of 1,667 new homes per year. If the Council does not positively plan to meet its identified need then the Council will be placed in the 'presumption of sustainable development'. This means that the council will be less likely to defend against inappropriate development through the planning appeal process. We have seen in other London Boroughs refusals	No change.

		there some more sinister motivations behind the distribution of "opportunities"? The statement that Lewisham Centre has the ambition to become a major metropolitan centre was news to me until recently. Who made this decision? We as a community? Or some planning strategist who saw "opportunities"?		for development on Metropolitan Open Land for example being overturned at appeal because the Council could not demonstrate an appropriate plan for growth or past housing delivery. The London Plan sets out the potential future re-classification for Lewisham as a Metropolitan Centre. This is reflected locally both in the adopted Lewisham Town Centre Plan and the draft Local Plan also takes this forward.	
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** The use of Commonplace is a good one. However as there have been multiple consultations using this tool, useful comments which have crossover pertinence with the local plan are not being noted. From an engagement perspective this is also confusing and am sure gives the impression to some that their comments have either been ignored or that they have already commented and so don't need to again.	0	Support for Commonplace noted. Because of its effectiveness the Council does use the tool on multiple consultations. The Council's main consultation hub is Citizen Space, which is accessed directly from the Council's webpage.	No change.

Part 1 – Planning for Lewisham		Do you have any comments on the introductory sections of the Local Plan? I fully support and endorse Make Lee Green's proposal (I am not a me.bdr). For clarity, their response is found here: https://drive.google.com/file/d/1hZtCl3zgurAwznSfo_5qV7xukZzRg9m4/view?usp=drivesdk	1	Noted. The Council's response to Make Lee Green's representations are set out elsewhere in this Consultation Statement.	No change.
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** I fully endorse and Support Make Lee Green's response they have submitted. To clarify, their response is available here: https://drive.google.com/file/d/1hZtCl3zgurAwznSfo_5qV7xukZzRg9m4/view?usp=drivesdk	1	Noted. The Council's response to Make Lee Green's representations are set out elsewhere in this Consultation Statement.	No change.
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** Please don't ignore the A205 Stansted Road parade of shops (nos 294-341) which is a real trouble spot and totally NEGLECTED. There is high pollution due to bad traffic on A205. Please don't ignore us just before we sit on the border between two wards, we are always forgotten!	1	Noted. The Local Plan sets out proposals to support the Healthy Streets Approach along the A205. It also includes specific policies dealing with neighbourhood parades.	No change.
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** I support the Forest Hill Society submission.	0	Noted. The Council's response the Forest Hill Society's representations are set out elsewhere in	No change.

				this Consultation Statement.	
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** Why were all the notices put near any site appearing in the local plan identical i.e gave the overall location of the Local Plan on the council website / commonplace but did not link to the specific page of the Plan which detailed the plans for that site. I am assuming the reason could be cost-cutting with continued government reduction of funding plus during the time of extra costs during pandemic but it did impede people locating the site online - your website since its overhaul some time ago has become much more difficult to navigate - nit sure who updated it and what their remit was and whether it is considered that they achieved it but I would say it was not to make the website more user-friendly and more accessible.	0	The site notices gave information to the Commonplace website which was constructed to make it easy for residents to comment on certain sections of the plan. The Local Plan is a large document so we appreciate that it may not have taken you through to the exact site. It has been desktop published with embedded hyperlinks to make it easier to navigate.	No change.
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** We note that the Local Plan is based on a listed number of Evidence based documents such as the Lewisham Characterisation Study (2019), the New Cross Area Framework and Catford Town Centre Masterplan.	0	All the evidence base documents for the draft Local Plan can be found on the Council planning website.	No change.

		It is unclear if these are all of the evidence based documents as there appears to be no specific rationale or basis for designating the Sydenham Extension Area of Local Special Character - especially as there is no mention of the Kirkdale area on the above character study.			
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** I support the objectives of the plan but the proposals do not match the ambitions of the plan and there is a lack of specific commitments. I fully support the comments and proposals made in the Make Lee Green submission https://drive.google.com/file/d/1hZtCl3zgurAwznSfo_5qV7xukZzRg9m4/view	1	The draft Local Plan is a strategic policy document which is informed and has informed more detail pieces of work such as the Parks and Open Space strategy, Transport Strategy A22 Development Framework, Catford Framework etc. The Council's response to Make Lee Green's representations are set out elsewhere in this Consultation Statement.	No change.
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** There is so much material it feels entirely overwhelming and unclear what has changed. Feels like a deliberate ploy to avoid engagement and scrutiny	0	The length of the draft plan reflects that it will update and consolidate 4 adopted plans into a single document. We prepared a summary version of the Local Pan to accompany the document	The Local Plan has been reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan has also been prepared.

				to make the process more accessible. We also structured the Commonplace site by topic and area – again to aid accessibility.	
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** You have already absolutely ruined Hither Green with the devisive LTNs. You now want to close the roads again under the disgracefully misleading School Streets closures, which will throw the periphery roads back into gridlocked, polluted chaos. But apparently that's not enough, now you want to throw a ridiculous amount of new housing into the mix when we don't have the infrastructure for them! This is absolutely ridiculous	0	The Low Traffic Neighbourhoods project is not within the scope of the draft Local Plan consultation. The Council's position on LTNs is set out on our website.	No change.
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** You have ruined Lewisham. It looks awful and you have packed as many people as possible into what is becoming the next Croydon. Where is the infrastructure around this new Lewisham? How man new Doctors, Schools, Green areas and out doors spaces have you created? You have failed the borough and packed as many people in as possible You have utterly destroyed the roads with idiotic plans in hither green and	0	We appreciate that tall buildings is a divisive issue for many residents. The London Plan makes it clear that tall buildings in appropriate locations are part of the solution to tackle the Capitals housing crisis. The London Plan directs the Council through the Local Plan to identify those	No change.

		that stupid bus lane outside the old ladywell baths.... [*some of this comment was removed due to derogatory language and unfounded allegations*]		locations that are appropriate for tall buildings and set threshold heights. We believe that suitable locations for tall buildings should be in accessible areas with good access to public transport, local facilities and jobs. We believe that Lewisham Town Centre is a sensible and sustainable location for high-density development. Within Lewisham Town Centre alone new development has delivered the following: Extension to Prendergast Vale School, River Naturalisation and improvements to Cornmill Gardens, The Glass Mill Leisure Centre, and Confluence Park. Future development will also include a new cinema complex, a new public square, improved transport provision, more shops and local jobs.	

				As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan.	
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** The timescale of the local plan is twenty years and a lot could change during this time. Funding levels could be very different. There is no indication of what can be currently achieved and what needs additional funding to be achieved. The plans could be much better summarised and key milestones identified. Without measurable targets success cannot be judged. So much in the plan is an aspiration.	2	The NPPF requires that the Local Plan is reviewed every 5 years, and updated where appropriate. The plan has a monitoring section set out in Part 5 which will be monitored each year and the results published in our Authority Monitoring Report.	No change.
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** How can you make a successful plan without taking into account the changing traffic	0	The draft Local Plan is underpinned by a Transport Assessment which factors in future	No change.

		patterns which will emerge from introduction of LTNS or not if they are removed/ amended , Low Traffic Emission Zones which will surely effect the traffic flows around the South Circular and not always as plotted in theory in advance.		transport projects. The study will be published as part of the evidence base.	
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** Why are some areas being re designated without questions as to why being swerved by council officers and in some cases being down graded eg Sydenham Hill Ridge. This wouldnt be to fit the aims of the Councillor Planning Committee?	0	The Local Plan proposes to re-designate Sydenham Hill Ridge from an Area of Special Character to an Area of Special Local Character. It is considered that this will continue to recognise the distinctive qualities of the ridge and ensure development responds positively to this.	Local Plan amended to clarify Sydenham Hill Ridge to be designated as an Area of Special Local Character.
Part 1 – Planning for Lewisham		Do you have any comments on the introductory sections of the Local Plan? No it's badly set out and there is no mention of Ladywell . There seems to be theme of neglecting Ladywell within these plans. Where are the details for the cinema in Ladywell? There is no focus on air traffic pollution despite Ladywell being the connecting area by car to central London. Ladywell Village has always been the jewel in the crown for the borough and it appears the that new plans have not considered the improvements or changes needed to improve/ update Ladywell. In	0	The Ladywell area comprises largely of an established residential neighbourhood where sensitive intensification will be supported to deliver new homes and other area improvements. Owing to its distinctive historic character there are limited major or large site redevelopment opportunities and therefore few site allocations in Ladywell.	No change.

		addition the planned Bakerloo line is due to come to Ladywell and there needs to be more cup tempo resources available, the cinema for example, more shops, facilities available along Ladywell Road, also access to local services available to commuters. The plans completely neglect Ladywell and they are unacceptable.			
Part 1 – Planning for Lewisham		Do you have any comments on the introductory sections of the Local Plan? I feel that the plan is far too dense and covers too much, maybe thats the intention as it makes for an incredibly confusing document. Pages of information about the reasons why all this needs to happen and then towards the end we finally get to the part which mentions what will actually be impacted - not sure how much housing the borough needs and also proposing to lose a number of supermarkets (Sainsburys & Lidl at Bell Green and Sainsburys at Lee Green) surely goes against the increased population who will need to shop somewhere. Not to mention the employment that these places provide. Also with Lewisham wanting to reduce car use, the supermarket that currently people can walk to will be removed and instead	1	The length of the draft plan reflects that it will update and consolidate 4 adopted plans into a single document. The level of detail included in the plan is in part a response to feedback from local community groups who requested that the new Local Plan provide more detailed policies and guidance on selected policy topic and neighbourhood areas. However it is acknowledged parts of the plan are repetitive and could be made more concise. The draft plan is not intending on losing	The Local Plan has been reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan has also been prepared.

		they will be driving further away - makes no sense to me. The LTN hasn't worked, I live in Grove Park and for months now we have suffered the knock on impact of all these road changes and as a result have terrible traffic.		supermarkets but redeveloping these in more urban, mixed-use formats with supermarkets on the ground floor and other uses above. This is a standard model that has worked successfully throughout London and one which most of the big supermarkets have experience in delivering. The Low Traffic Neighbourhood project is not part of the draft Local Plan consultation. Further details on the Councils position on the LTN can be found on the Council's website.	
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** 33 pages of pure waffle	0	Disagree. The introductory section includes important background information.	The Local Plan has been reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan has also been prepared.
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** Too much housing proposed, which wouldnt go to locals who cant afford so called affordable housing. Too much zoning..not enough allowance for small areas of retail/	2	Lewisham like all London Boroughs is facing a Housing Crisis and needs to build many more homes. Particularly genuinely affordable homes. The	No change.

		industrial activity within a housing area.We dont all work from screens, want to be zoned to the remaining large scale retail park area or have the strength ability to cycle everywhere so depend on public transport/ cabs . cars so need accessible parking. Since the Bakerloo line extension has been kicked into the never never then surely the whole plan should be re evaluated and the numbers of housing required by the mayors plan/ central government be CHALLENGED. Some areas will be so over densely populated its creating future problems. Low Traffic Neighbourhoods divert the cars onto other routes so different places become more polluted ..they don't make pollution go away! Lewisham is a borough of villages which we all love in the round..please dont think that we want or need more and more high density housing, more and more people and all the costs that the borough will need to service in the future		London Plan set Lewisham a Housing Target of 1,667 new homes per year. Whilst the draft Local Plan is supportive of the BLE the plan is not predicated on its delivery. The Low Traffic Neighbourhood project is not part of the draft Local Plan consultation. Further details on the Councils position on the LTN can be found on the Council's website.	
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** This is nonsense!	0	Not a constructive comment.	No change.
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** I don't know where to put this but this whole consultation is totally overwhelming. So much content to review. Over 20 sections with multiple documents each, many of	3	The length of the draft plan reflects that it will update and consolidate 4 adopted plans into a single document.	The Local Plan has been reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan has also been prepared.

		them over 50 pages long. Who has the time and inclination to read all this?! I certainly have not. I managed to dip into a few of the areas that felt important, and read the summary documents, which by their nature are incredibly high-level and vague, so then I don't know what I am agreeing or disagreeing with. I realise this is an ambitious plan, for a whole borough and I get why you would present it all together, rather than consult on it in chunks where residents will struggle to connect the dots and see the bigger picture. But there must be a middle ground somewhere. I hope there will be more consultation on the specifics, and you will find other forms of getting input from residents somehow.		We prepared a summary version of the Local Pan to accompany the document to make the process more accessible. We also structured the Commonplace site by topic and area – again to aid accessibility.	
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** Why are you pushing through these plans before sorting out the absolute mess you've made with the illegal road closures?	3	This comment appears to be referring the Low Traffic Neighbourhood project. The LTN is not part of the draft Local Plan consultation. Further details on the Councils position on the LTN can be found on the Council's website.	No change.
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** The plan is biased in language and proposed delivery. The mention of buildings that not in	3	Disagree. The Council is required by national planning policy to prepare a Local Plan that sets a	No change.

		keeping with local area is opinion, unfounded, inappropriate and, therefore, biased and unprofessional. This is simply a profit making scheme. To see developments considered in areas (west sydenham) that are estate dense, with strained infrastructure and overpopulated is ridiculous.		positive framework in place managing growth and new development, whilst meeting identified local needs.	
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** I think it looks great. My questions are about how much time these improvements will take. Certainly where I live, (South of the borough) the improvements are desperately needed- *however* things like proposing a new town centre at Bell Green whilst taking away its local sports facilities seem counter intuitive and improvements should 'join the dots' I.e. plan for improved access between Home Park/ Bridge Leisure Centre/ 'new town centre' /Southend Park/ Waterlink Way. At the moment all these are fragmented and their potentials are limited due to this and the poorly designed roads at Bell Grn. When I saw the plans for this area I was really delighted. I just hope that there is the proper consultation and later the finance to see it all through	0	Support noted. The Local Plan must be demonstrably deliverable over the plan period, which is up to 2040. The council has engaged with landowners and stakeholders (including infrastructure providers) to understand their future aspirations for sites and projects and the deliverability of the proposals.	Site allocation policies amended to make clear the expected timescales of delivery on specific sites.
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** The documents haven't been properly proof-read. I found the numerous typos distracting.	0	Noted.	The document will be proof read again through the Regulation 19 process.

Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** Far too verbose to be coherent.	0	Noted.	The Local Plan has been reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan has also been prepared.
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?**NO! Once again, Lewisham mention the North of the Borough but neglict it in reality. At the moment Lewisham are proud of the investment in the North of the borough but fail to mention that almost all, if not all, of that investment is in private housing that has been forcing locals out of the area as private rents have more than quadrupled in only a few short years. Additionally, Lewisham have intentionally neglected Deptford High Street by allowing the local police to ignore the groups of alcohol drinking anti-social behaviour people that gather at the junction of the High Street and Giffin Square, even during this lockdown. They crowd the paths, play loud music, swear a lot and force pedestrians to use the road as a footpath. It has got so bad in recent years that we have seen a thriving market, which was becoming one of the best in the whole of London. People travelled across the city to go to Deptford market but no longer. Most of the stallholders left because of dwindling services, drug dealing, smoking drugs publicly, with the police	0	The draft Local Plan is a strategic policy document that directs investment and growth in the borough. Significant investment has been directed to the north of the borough and will continue to do so. Previous investment in the area include the Deptford Station and DLR, Public realm improvements along the High Street and Deptford Station Square, Faircharm Creative Quarter, Deptford Lounge and public square, Tidemill Academy, Route 1 – A series of public spaces stretching from Deptford to New Cross Gate to name just a few. Please refer to Part 3 Section 15 Lewisham's	No change.

		walking past and ignoring it. This month saw the last of the banks close so the traders, both shopkeepers and market traders have nowhere to bank. This is all for the profits of a corrupt few that are racketeering with land values. They are lowering the values for a cheap buy and then mass profing on the housing sales values. Finally, Lewisham have overconcentrated the local population and it's growing rapidly, whilst they have not improved local public transport. Lewisham Council is focused on the Bakerloo Line going to Central Lewisham via New Cross Gate when both New Cross Gate and Lewisham Centre are already adequately catered for, [*Parts of this representation was removed due to derogatory language and unfounded allegations]* *and* traders before this pandemic and it's not expected for many to survive. Lewisham have many properties (commercial) on the High Street but prefer to leave them empty rather than lease them at a reduced rent and it's the council tax payers that are footing the losses. Seriously, Lewisham can have a "local" plan but keep it local to Lewisham and let North Lewisham have it's own plan, developed by local residents and not corrupt local politicians Deptford needs to be out of Lewisham and habve it's own council, with it's own plans as Lewisham has		North Area for details on future proposals. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan.	

		constantly failed Deptford and will continue to do so, just so those in the leafy parts of the borough can have their frsh air and peace.			
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** Lewisham is a series of distinctive neighbourhoods (villages) and this is recognised by the plan but the structure beyond Lewisham seems to rest on it being an "integral part of London". This may be true but there are more steps in the chain to the larger London area. It is important to recognise such emerging sub-regional structures as South East London CCG for the delivery of health and social care. Under that structure some important services for Lewisham residents will be delivered outside the Lewisham boundary and infrastructural changes need to recognise this if, for instance, people have to travel beyond Lewisham boundary for service/treatment.These additional structural co-dependencies need to be fully mapped and reinforced if pan-council delivery is to be facilitated.	2	We acknowledge that Lewisham is part of the south east region and work collaboratively with neighbouring local authorities and service providers at this level. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** Disagree. The rationale should reference the long delay, what action will be taken to mitigate the risk of further delay.	2	The plan has a monitoring section set out in Part 5 which will be monitored each year and the results published in our Authority Monitoring Report.	No change.

		Introductory sections should include a high-level, realistic milestones plan that sets out measurable success criteria. It should also set-out Lewisham's budget resource plan - people & money against key milestones & financial years			
Part 1 – Planning for Lewisham		**Do you have any comments on the introductory sections of the Local Plan?** No	0	Noted	No change.
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** I would like to see plans that encourage the growth of more local, small businesses rather than more large chains and for even a more holistic view to what kinds of businesses it encourages to open, and more of an effort to help employ more local people at these places. New Cross Gate to New Cross, I am guessing, was once somewhere a person could come for all of their food and other shopping needs. I'm not sure that one could say the same today. I am also concerned that there is not enough consideration given to conservation areas to help preserve some of the historic views and lines of sight. I also think that there could/should be a great focus on culture in the bigger plan, taking into account the population of creative professionals and students in the area.	0	The draft Local Plan sets out strategic objectives around building a thriving and inclusive local economy. In addition, Part 2 Section 8 dealing with Economy and Culture sets out policies focused on Lewisham's town centres and employment areas. Further area-based policies are set out in Part 3 of the Local Plan. For policies on Heritage please refer to Part 2 Section 6 Heritage of the plan which sets out the approach to conserve and enhance Lewisham's heritage assets.	No change.

		2. Do you have any comments on the strategic objectives? N/A			
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** - Less intense development along the strategic corridor from Lewisham Center to Catford if it will look similar to what is currently being developed in Lewisham Center - More engagement of local people beyond some consultations which basically can be ignored. Engage people during the design phases of housing developments and the public realm. - The assumption of continued population growth might be wrong. **2. Do you have any comments on the strategic objectives?** See my comment for the introductory part of the plan.	0	The Local Plan is legally required to be consistent with the National Planning Policy Framework and in general conformity with the London Plan. Lewisham like all London Boroughs is facing a Housing Crisis and needs to build many more homes. Particularly genuinely affordable homes. The London Plan set Lewisham a Housing Target of 1,667 new homes per year. Following the public consultation, the council liaised with the Greater London Authority for updated population projections. Whilst Brexit and Covid-19 have had short term impacts the forecast is for significant growth over the long term. The latest population projections will be	Local Plan amended to refer to the latest position on population projections, which have also been used to inform ongoing work on the Infrastructure Delivery Plan.

				reflected in the plan and used to inform the Infrastructure Delivery Plan. The consultation on the draft Local Plan was carried out in accordance with our Statement of community Involvement and goes beyond the statutory requirements.	
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** N/A **2. Do you have any comments on the strategic objectives?** Great to see a commitment to sustainable transport. Cars are still over-privileged in the borough, with a lack of safe pedestrian crossings, no apparent enforcement of speed limits and parking on pavements encouraged at the expense of walkers (e.g. Ennersdale Road). What about more pocket parks, car-free zones and street trees - not just in the wealthiest areas, but everywhere in Lewisham?	4	Support noted	No change.
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?**	0	We appreciate that tall buildings is a divisive issue for many residents. The	Local Plan amended to include a target size mix for affordable housing, which will help to ensure

		The vision for Lewisham should learn from the mistake made in the “regeneration” of the area around Lewisham station which has been rendered hideous by the over-building of architecturally dubious blocks of flats in close proximity to a railway line and without adequate infrastructure. Instead of building flats the council should focus on building affordable family homes. **2. Do you have any comments on the strategic objectives?** The council needs to consult properly with residents on the objectives that they want for their area rather than only listening to the people who tell them what they want to hear.		London Plan makes it clear that tall buildings in appropriate locations are part of the solution to tackle the Capitals housing crisis. The London Plan directs the Council through the Local Plan to identify those locations that are appropriate for tall buildings and set threshold heights. We believe that suitable locations for tall buildings should be in accessible areas with good access to public transport, local facilities and jobs. We believe that Lewisham Town Centre is a sensible and sustainable location for high-density development. Within Lewisham Town Centre alone new development has delivered the following: Extension to Prendergast Vale School, River Naturalisation and	that affordable family homes are delivered as new housing development comes forward.

				improvements to Cornmill Gardens, The Glass Mill Leisure Centre, and Confluence Park. Future development will also include a new cinema complex, a new public square, improved transport provision, more shops and local jobs. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** N/A **2. Do you have any comments on the strategic objectives?** The ways you intend to engage with the community is opaque. No specific	0	The consultation on the draft Local Plan was carried out in accordance with our Statement of community Involvement and goes beyond the statutory requirements.	Local Plan monitoring framework amended to include additional indicators and monitors.

		mechanisms are described. Whilst putting in comments to a form gives you feedback it doesn't offer a meaningful dialogue between the council and community groups. Ward councillors don't get a mention. What are the measures you will use to judge quality of life in Lewisham? A greener borough is not possible if all spare land is going to be used to meet housing targets. You do not explain how both objectives can both be met.		The draft Local Plan has been underpinned by a number of evidence base documents and Frameworks that have had extensive public consultation and engagement with community groups. We have also had a number of Local Plan sessions with Councillors throughout the process. Part 4 of the Local Plan includes a monitoring framework. It is acknowledged that this could be expanded upon. We also held 16 online meetings around policy topics and sub areas.	
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** Yes maintain a strong retail presence, plus every retail building doesn't have, shouldn't have flats built above them. Why are we attempting in Lewisham and London in general to keep accommodating more and	0	The Local Plan sets out a positive strategy for managing future growth and development across the borough, consistent with the Good Growth policies set out in the London Plan, and the	No change.

		more people. Why isn't there a program to spread the load across the whole country. London is already full. **2. Do you have any comments on the strategic objectives?** N/A		principles of sustainable development set out in national planning policy. The Local Plan is legally required to be consistent with the National Planning Policy Framework and in general conformity with the London Plan. Lewisham like all London Boroughs is facing a Housing Crisis and needs to build many more homes. Particularly genuinely affordable homes. The London Plan set Lewisham a Housing Target of 1,667 new homes per year. If the Council does not positively plan to meet its identified need then the Council will be placed in the 'presumption of sustainable development'. This means that the council will be less likely to defend against inappropriate development through the planning appeal process. We have seen in other London Boroughs refusals	

				for development on Metropolitan Open Land for example being overturned at appeal because the Council could not demonstrate an appropriate plan for growth or past housing delivery.	
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** It is all in the detail and it can find lovely, but we know the horror of Lewisham Centre and the windy no-one friendly cavernous bank of tower blocks with local fly tipping at the bottoms. You have a photo included of a really unimaginative square infront of the Deptford Library where street drinker congregate and the historic building on Convoys Wharf which isn't looking at our interesting heritage and grasping the unique opportunity to make Deptford the heritage destination along with Greenwich. The new developer lead buildings, many of them shoddily put together aren't inclusive, the new bars and venues and bike shops have a quite specific clientele **2. Do you have any comments on the strategic objectives?** They sound lovely. Dream the dream.	0	Disagree with this assessment.	No change.

An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** Inclusivity means valuing all voices, are you really doing that? Some communities I suspect feel overlooked or ignored I suspect. **2. Do you have any comments on the strategic objectives?** N/A	0	The consultation on the draft Local Plan was carried out in accordance with our Statement of community Involvement and goes beyond the statutory requirements. The draft Local Plan has been underpinned by a number of evidence base documents and Frameworks that have had extensive public consultation and engagement with community groups. We have also had a number of Local Plan sessions with Councillors throughout the process. Further to this the Council has also undertaken targeted consultation to reach out to 'seldom herd' groups and our BAME community. Further details can be found at the front end of	No change.

				this Consultation Statement.	
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** Please see comment on strategic objectives. **2. Do you have any comments on the strategic objectives?** Policy OL1 Criterion e. of policy outlines the identification of a new Opportunity Area at Bell Green. Paragraph 3.38 of the draft plan notes that the Bell Green and Lower Sydenham area exhibit some of the highest levels of deprivation, noting that it features a number of large sites offering significant development potential if brought forward in a strategically coordinated way. The designation of Opportunity Areas falls within the remit of the London Plan and cannot be designated as part of the local plan process	0	The Local Plan has identified the area a Growth Node with the potential to be designated as an Opportunity Area through the London Plan review process.	Local Plan amended to clarify that new Opportunity Area will need to be designated through a future review / update of the London Plan.
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** This is too vague and fails at the first hurdle. "Open to all" if you speak/read english and have a laptop. The high level intention is pretty, but without SMART or even just	1	The vision is underpinned by a series of objectives, many of which directly relate to the corporate priorities of the Council. These objectives in turn	Local Plan monitoring framework amended to include additional indicators and monitors.

		specific examples, it is hard to see if this is just hot air delivered with good intentions. **2. Do you have any comments on the strategic objectives?** All objectives need to be SMART else our expectations will not be met.		feed into specific policies and sub area text. The plan has a monitoring section set out in Part 5 which will be monitored each year and the results published in our Authority Monitoring Report. It is acknowledged that this could be expanded upon.	
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** If you remove the pretentious buzz-words, define your terms and nix focus-group-led, repetitious, meaningless sales-speak the average reader might have a chance of making sense of this throw-enough-mud-some-of-it will-stick "strategy". The net impression I get from this is that the language attempts to obfuscate the 'vision' rather than reveal it. I assume because the vision will not get support if clearly spelt out. **2. Do you have any comments on the strategic objectives?** You need to have concrete proposals if you want concrete responses. That's consultation 101. Right now, you're just wasting our time with arm waving.	3	Disagree. The consultation on the draft Local Plan was carried out in accordance with our adopted Statement of Community.	No change.

		See LTNs as an example of "how to do it wrong, annoy half the population and discover our 'strategic goals' are not welcome"			
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** Engage in a meaningful way with residents on the boundaries of LTN's in your bid for reducing car use. as in E/11 Proper monitoring of the effects on the surrounding roads. Stop sticking to dogma and actually look seriously at the data. **2. Do you have any comments on the strategic objectives?** No more blocking of roads with planters - we need better pavements/cycle lanes/ pedestrian crossings/enforced speed limits/school streets/some pedestrianised shopping areas/more cycle hangars/better street lighting/better transport/continous pavements/copenhagen crossings/chicanes NOT planters!	1	The Low Traffic Neighbourhoods project is not within the scope of the draft Local Plan consultation. The Councils position on LTNs is set out on our website.	No change.
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** Not really - it would be so cool for things to move faster though I realise that is unrealistic especially given the pandemic	0	Support noted	No change.

		and the current problems with meeting in real life **2. Do you have any comments on the strategic objectives?** It seems very thorough in its objectives. As someone living near one of the potential areas for investment and regeneration it would be great to be included in the discussions			
An Open Lewisham		1. Is there anything you would like to see changed from the Vision for Lewisham? Keep things as they are and remove stop LTNs and school streets. It is causing undue stress and moving problems to other areas. You say it's successful but during a pandemic when we are all staying home gives such an unreal picture. Double cycle lane in Molesworth Street still empty 2. Do you have any comments on the strategic objectives? N/A	0	The LTNs is not within the scope of the draft Local Plan consultation. The Councils position on LTNs is set out on our website.	No change.
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** Yes! I fail to see anything 'open' about Lewisham. This is because I also fail to see how building an inordinate amount of high	0	The Local Plan sets out a positive strategy for managing future growth and development across the borough, consistent with the Good Growth	No change.

		rise apartment buildings constitutes a way of creating a 'community'. High rise living rarely offers residents the opportunity to know one and other. The only thing created so far, is a wind tunnel of a journey, around the station area. There is a construction site in front of the station, for twenty floors of residential accommodation, blocking the vista for those who recently purchased accommodation alongside the station and I see only this week, notice of yet another 536 residential 'units' being erected adjacent to the 33 storey student accommodation block and 23 floors of residential high rise already nearing completion next to Lewisham station on Loampit Vale. When will it stop? The promise of 'genuinely affordable' housing is unlikely to materialise. Buying a part share in something and paying rent on the remainder, is definitely not affordable. Especially if you happen to be single. **2. Do you have any comments on the strategic objectives?** Yes. Please ensure you deliver the 'timely infrastructure' well before any more residents have to rely on it.		policies set out in the London Plan, and the principles of sustainable development set out in national planning policy. The Local Plan is legally required to be consistent with the National Planning Policy Framework and in general conformity with the London Plan. Lewisham like all London Boroughs is facing a Housing Crisis and needs to build many more homes. Particularly genuinely affordable homes. The London Plan set Lewisham a Housing Target of 1,667 new homes per year. The draft spatial strategy in the draft plan seeks to accommodate this growth in opportunity areas and within our town centres. We believe that locating new development in areas which have access to good public transport, local facilities and jobs is a sensible and sustainable	

				approach. This also helps conserve and enhance other areas of the borough that are lower density and/or our Conservation Areas. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan.	
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** I'd like to see more about what the planning levers are that the council can use to support local communities. I live on a street with a strong sense pride and community, but there are a number of planning related issues that undermine or frustrate this. These include privately owned parking spaces and garages, which are poorly maintained and attract anti social behaviour; a poorly managed MOT garage on the street	0	For matters on anti-social behaviour please contact the relevant Council department through the Lewisham Council website. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road	No change.

		that creates lots of issues with traffic, speeding and anti-social behaviour; and the sale of tiny pockets of land to developers, eating up green space and light for existing residents. **2. Do you have any comments on the strategic objectives?** I'd like to see an explicit recognition of the potential role of the plan in supporting local communities and social infrastructure.		and public transport improvements etc.) that is required to accommodate the level of growth anticipated through the Local Plan. Part 4 of the Local Plan sets out the approach to delivering the Local Plan, including by working with local communities and other stakeholders.	
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** The Covid-19 issues have raised the profile of home working. This is not going to go away and needs to be recognised in the vision as part of a way of life in the future. To support more home working we need better broadband capability; it is pathetic all across London and Lewisham should take a lead in facilitating faster development. This would require a greater emphasis on the economic aspects of the vision which, to me, seem to be less of a priority. **2. Do you have any comments on the strategic objectives?** Greater emphasis on economic development especially for small businesses.	0	The draft Local Plan recognises the importance of improving broadband capacity particularly to support economic development. The draft Local Plan part 2 policies on Economy and Culture set out approaches to supporting small and medium sized enterprises. However these will be reviewed and strengthened for clarity. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP	Local Plan Economy and Culture section policies amended to clarify and strengthen support for small businesses, including start-ups and independents. This includes updates to policies on low cost and affordable workspace.

				sets out the necessary infrastructure including broadband infrastructure to accommodate the level of growth anticipated through the Local Plan.	
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** I think you need to spell out what "An Open Lewisham" actually means. Bearing in mind that Lewisham has been closing roads for no good reason, does an Open Lewisham policy mean they will reopened? I presume not! **2. Do you have any comments on the strategic objectives?** This seems to be mainly waffle rather than concrete objectives.	4	The vision is underpinned by a series of objectives, many of which directly relate to the corporate priorities of the Council. These objectives in turn feed into specific policies and sub area text. The plan has a monitoring section set out in Part 4 which will be monitored each year and the results published in our Authority Monitoring Report.	No change.
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** I think it is over optimistic and places too much emphasis on the under privileged. **2. Do you have any comments on the strategic objectives?** Yes, it is biased against the middle classes.	0	The Local Plan identifies the issues of deprivation within the borough and sets out approaches to address this. It is not clear from the comment how the Local Plan is perceived to be biased against the middle classes – no further explanation has been provided.	No change.

An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** No **2. Do you have any comments on the strategic objectives?** Objectives are good - on the whole I agree with the aims and aspirations of this local plan Thank you for this clear and open consultation	0	Support noted	No change.
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?** They are all laudable objectives. **2. Do you have any comments on the strategic objectives?** Whether they are achievable, especially in education and housing. So many parents in my road have moved out of Lewisham when it comes to secondary education provision. Do these objectives take account of what was achieved in the previous plan?	0	The vision is underpinned by a series of objectives, many of which directly relate to the corporate priorities of the Council. These objectives in turn feed into specific policies and sub area text. The plan has a monitoring section set out in Part 4 which will be monitored each year and the results published in our Authority Monitoring Report.	No change.
An Open Lewisham		**1. Is there anything you would like to see changed from the Vision for Lewisham?**	1	The detailed policy proposals are set out in the draft Local Plan. For some	No change.

		Just a bit more flesh on the bones so that we can comment on actual proposals in due course. **2. Do you have any comments on the strategic objectives?** They sound promising!		specific areas and sites, details further details will be established through the development management process.	
Delivering an Open Lewisham		**1. Do you have any comments on the spatial (growth) strategy scenarios and associated options? Select the scenario(s) and comment below** Bakerloo line extension phase 1 only **2. Please provide your comments on the spatial (growth) strategy scenarios selected above.** The plan to have reimagined growth on the New Cross Gate area is not in keeping with the conservation areas that are in close proximity. **3. Do you feel that there are other options or matters that should be considered for the spatial strategy? Please explain.** The development should be in character of the area, no high rises, with more provision for green spaces. The area lacks green spaces	1	The indicative capacities for the Former Hatcham Works site has been informed by the New Cross Gate Area Framework. This provides an indicative layout and massing for the site which is deemed appropriate by the Council. The former Hatcham Works site is a highly accessible site in a District Centre and is suitable for high-density development. The draft Local Plan Part 2 Heritage section includes policies dealing with heritage and conservation, including Conservation Areas, and any future development proposal will need to comply with these.	No change.

Delivering an Open Lewisham		**1. Do you have any comments on the spatial (growth) strategy scenarios and associated options? Select the scenario(s) and comment below** No Bakerloo line extension **2. Please provide your comments on the spatial (growth) strategy scenarios selected above.** The Bakerloo line will add more connectivity to Lewisham which is already well connected with buses, DLR and trains. Better to invest in more local connectivity rather than connectivity to Central London. **3. Do you feel that there are other options or matters that should be considered for the spatial strategy? Please explain.** Build a new park alongside new houses	0	The Bakerloo Line Extension is a key strategic transport project set out in the London Plan. It will directly connect the borough with the tube network for the first time and provide greater accessibility. The Council strongly supports its delivery. The draft Local Plan Part 2 section on Green Infrastructure sets out policies to protect and enhance open and green spaces. The Part 3 site allocations include specific provisions for the creation of new open spaces at key sites, for example, at Surrey Canal Triangle and Convoys Wharf.	No change.
Delivering an Open Lewisham		**1. Do you have any comments on the spatial (growth) strategy scenarios and associated options? Select the scenario(s) and comment below** N/A **2. Please provide your comments on the spatial (growth) strategy scenarios selected above.**	1	The draft Local Plan recognises the Climate Emergency and sets out clear objectives and policies around climate change adaptation and mitigation. It will help to support the Council's	No change.

		The language in the strategy needs to be more ambitious. The Climate Emergency needs to take the highest priority in the decision making processes. **3. Do you feel that there are other options or matters that should be considered for the spatial strategy? Please explain.** N/A		Climate Emergency Action Plan.	
Delivering an Open Lewisham		**1. Do you have any comments on the spatial (growth) strategy scenarios and associated options? Select the scenario(s) and comment below** Bakerloo line extension phases 1 & 2 **2. Please provide your comments on the spatial (growth) strategy scenarios selected above.** Other areas of the borough are well served by public transport I.e. frequent trains into Central London. The original proposed extension of the Bakerloo line will address this deficit going south into the borough **3. Do you feel that there are other options or matters that should be considered for the spatial strategy? Please explain.** N/A	1	Support for the BLE noted.	No change.
Delivering an Open Lewisham		**1. Do you have any comments on the spatial (growth) strategy scenarios**	0	Support noted	No change.

		and associated options? Select the scenario(s) and comment below Bakerloo line extension phases 1 & 2 **2. Please provide your comments on the spatial (growth) strategy scenarios selected above.** N/A **3. Do you feel that there are other options or matters that should be considered for the spatial strategy? Please explain.** N/A			
Delivering an Open Lewisham		**1. Do you have any comments on the spatial (growth) strategy scenarios and associated options? Select the scenario(s) and comment below** Bakerloo line extension phases 1 & 2 Preferred approach **2. Please provide your comments on the spatial (growth) strategy scenarios selected above.** I think it's a good strategy. I can't believe the people would oppose the development of the Bakerloo line to Hayes. Travel times still very fast and much more frequent. It opens up development potential so much for the Borough and as I live near Bell Green I can tell you that the plans outlined for here would be so much of an improvement. Also	1	Support noted	No change.

		it seems that there is real will to involve the local community with the proposals. **3. Do you feel that there are other options or matters that should be considered for the spatial strategy? Please explain.** N/A			
Delivering an Open Lewisham		1. **Do you have any comments on the spatial (growth) strategy scenarios and** associated options? Select the scenario(s) and comment below Bakerloo line extension phases 1 & 2 Preferred approach **2. Please provide your comments on the spatial (growth) strategy scenarios selected above.** I would support the Bakerloo line extension but would not place too much emphasis on it being delivered. There will be a big review of transport infrastructure post Covid and I would not place a bet on the extention being delivered in full or in part. Strategic develpments which are based on the delivery of the extention would, I belive, be suspect. The green approach is appropriate and is to be applauded. It needs to go hand-in-hand with a greater emphersis on character-led growth which, by its nature, is organic and thereby sustainable. Artificial development	2	Support noted. The Local Plan is not contingent on the delivery of the BLE, however the policies will seek to secure its future delivery. The Council has undertaken the preparation of additional evidence base documents, including on retail demand, which takes account of the latest impacts arising as a result of Covid-19. This evidence suggests there will continue to be a need to plan for additional retail capacity in the borough, although to a lesser extent than previously forecast. The draft Local Plan includes policies to ensure	Local Plan amended to respond to changes to the Use Classes Order and flexibility for permitted changes of use for main town centre uses. Local Plan amended to respond to updated retail capacity study, which lower level of provision over long-term.

		driven simply by the need to "use" space will often only deliver short term results and redundancy. **3. Do you feel that there are other options or matters that should be considered for the spatial strategy? Please explain.** Greater emphasis needs to be given to re-purposing of High Street facilities which have become redundant by the move to remote retail function. The Covid position will only speed up the move from physicial retail and leave more redundant shop space. On the other hand the desire to shop locally for foodstuffs in particular has driven a resurgance in the desire for open-air markets and the attractivness of farmers markets will grow and needs to be recognised in a spacial context - the need for felxible space that can be used for different funtions every day of the week needs to be promoted.		that new commercial space is designed with flexible specifications so that it can be adapted to a wide variety of uses and end users over its lifetime. The Government have introduced a new use Class E which allows more flexibility within our town centres in terms of permitted development rights. The Local Plan will be amended to reflect this.	
Delivering an Open Lewisham		**1. Do you have any comments on the spatial (growth) strategy scenarios and associated options? Select the scenario(s) and comment below** Bakerloo line extension phases 1 & 2 **2. Please provide your comments on the spatial (growth) strategy scenarios selected above.**	2	Noted.	Local Plan amended with additional key spatial objectives and policies dealing with Hither Green, including area west of the station / railway. Local Plan amended to designate Hither Green Lane as a new Local Centre.

		Hither Green west of the railway overlooked yet again. **3. Do you feel that there are other options or matters that should be considered for the spatial strategy? Please explain.** Hither Green west of the railway has had no investment or maintenance for more than 20 years. Not even the pavements have been touched. It should be included for an upgrade.			
Delivering an Open Lewisham		**1. Do you have any comments on the spatial (growth) strategy scenarios and associated options? Select the scenario(s) and comment below** Bakerloo line extension Phases 1 & 2 **2. Please provide your comments on the spatial (growth) strategy scenarios selected above.** Lewisham is in desperate need of the Bakerloo line extension! I cannot believe in the year 2020, the south still has no adequate access to the underground. This will improve residents commutes and actually reduce car use and pollution. The council wants us to decrease our use of cars but without proper access to quick and reliable transportation into central /inner London why would people bother.	3	Support for the BLE noted. The Local Plan is not contingent on the delivery of the BLE, however the policies will seek to secure its future delivery.	No change.

		3. Do you feel that there are other options or matters that should be considered for the spatial strategy? Please explain. No			
Delivering an Open Lewisham		**1. Do you have any comments on the spatial (growth) strategy scenarios and associated options? Select the scenario(s) and comment below** No Bakerloo line extension **2. Please provide your comments on the spatial (growth) strategy scenarios selected above.** Lewisham already has a train service from London Bridge - why do we need a Bakerloo extension? **3. Do you feel that there are other options or matters that should be considered for the spatial strategy? Please explain.** Something to avoid bottlenecks in Ladywell.	1	The Bakerloo Line Extension is a key strategic transport project set out in the London Plan. It will directly connect the borough with the tube network for the first time and provide greater accessibility. The Council strongly supports its delivery. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies.	No change.
Delivering an Open Lewisham		**1. Do you have any comments on the spatial (growth) strategy scenarios**	0	Support noted	No change.

		and associated options? Select the scenario(s) and comment below Preferred approach Flexible planning underpinned by sound principles **2. Please provide your comments on the spatial (growth) strategy scenarios selected above.** Glad to see some focus on Lewisham Town centre; much neglected in recent years but with huge potential given current, and future, transport links. **3. Do you feel that there are other options or matters that should be considered for the spatial strategy? Please explain.** N/A			
Delivering an Open Lewisham		**1. Do you have any comments on the spatial (growth) strategy scenarios and associated options? Select the scenario(s) and comment below** Bakerloo line extension Phases 1&2 **2. Please provide your comments on the spatial (growth) strategy scenarios selected above.** This is a good plan. **3. Do you feel that there are other options or matters that should be**		Support noted. The Council has and will continue to lobby the Mayor of London and Transport for London for investment in new and improved public transport infrastructure, including bus services. We will pass your comments re Honor Oak on to our Transport team regarding bus services.	No change.

		considered for the spatial strategy? Please explain. Please can there be a bus service that doesn't require a change of bus for residents of the Honor Oak area to be able to travel easily to the Greenwich area? There are many lovely parks in Lewisham but the ones accessible with just one bus route from the Honor Oak area seem to be hilly. Lots of older and less able bodied people who live in this area would like to be able to visit Greenwich Park and the riverside areas there and in Deptford but this requires a change of buses, which lengthens the journey and makes it more cumbersome. The 185 used to go right through to Greeenwich, (and even Woolwich during the rush hour), which enabled an easy journey. Also if the 63 bus route could be extended down to Honor Oak Park this would enable an easy trip for elderly and disabled people to Peckham Rye Park, which is nice and flat as well. Also Mayow Park is not hilly and suitable for wheelchairs and less able bodied people but dos not have a public transport route from Honor Oak Park.			

Lewisham Local Plan

Regulation 18 consultation statement

Appendix 3 – Regulation 18 Draft Local Plan Commonplace Responses Parts 2

September 2022

Part	Section, policy or paragraph	Respondent submission	No. of Agreements	Council officer response	Action
2	Managing Development	**1. Are there any other topic areas that you feel should be covered in Part 2?** More emphasis on low carbon housing, e.g. passive house design, solar gain architecture, etc. **2. Are there any topic areas that you feel should not be covered in Part 2?**	**2**	Noted. The draft Local Plan policies on sustainable design and construction are broadly in line with the London Plan.	Local Plan amended with new policy on sustainable retrofitting. Local Plan amended with additional details on non-regulated carbon emissions.
2	Managing Development	**1. Are there any other topic areas that you feel should be covered in Part 2?** Commercial Units which are left unused - community use for these spaces **2. Are there any topic areas that you feel should not be covered in Part 2?** N/A	**1**	Noted. The draft Local Plan includes a policy on meanwhile uses.	Local Plan amended so that meanwhile uses policy refers not only to uses for housing but commercial uses where appropriate.
2	Managing Development	**1. Are there any other topic areas that you feel should be covered in Part 2?** Building design should be innovative and aim to build new buildings of architectural merit. **2. Are there any topic areas that you feel should not be covered in Part 2?** The council should commit to transparency in its planning decisions. Enforcement of planning decisions should be active and be seen. There are no targets for enforcement timescales	**3**	Noted. The draft Local Plan does not preclude innovative building designs. Planning enforcement is outside the scope of the Local Plan.	No change.
2	Managing Development	**1. Are there any other topic areas that you feel should be covered in Part 2?** Redevelop Lee gate shopping centre - with shops and not residential homes. It's run down and attracting the wrong attention in the area **2. Are there any topic areas that you feel should not be covered in Part 2?** Redevelopment of Sainsbury's Lee green to 120 residential spaces. Not every supermarket needs to have a block of flats dumped on the top of it. Existing network infrastructure is poor where do you plan all these people will go and we are not equipped with the appropriate transport links to house all these extra residents and people. Just a way for the council to make more money from council tax.	**1**	Noted. The draft Local Plan includes policies to enable the revitalisation of Lee Green district centre, including sites allocations for the shopping centre. The site allocation for the Sainsbury's provides for the retention of commercial uses at ground floor with residential above in order to make a more optimal use of land. The Local Plan is supported by an Infrastructure Delivery Plan which will help to ensure new development is appropriately supported by infrastructure.	No change.
	Managing Development	**1. Are there any other topic areas that you feel should be covered in Part 2?** Yes. You cannot simply keep building, keep increasing over populated areas where the infrastructure is already too insufficient. I would really like to know what happens to the landowners that lewisham are planning around? I am a landowner, my premises are included in the plans and yet I have been given no notice of this proposals before now so please let us know how you propose to acquire any land or work with stakeholders to avoid the obvious hostility that 'being kept in the dark' creates. Thank you **2. Are there any topic areas that you feel should not be covered in Part 2?** Yes. Please do not refer to buildings being 'not in keeping' with the landscape or area. Most of the buildings you have referred to are well maintained and are in any way detrimental to the	**3**	The public consultation was carried out in accordance with the Council's adopted Statement of Community Involvement. The Local Plan sets out the development strategy for the borough with land use principles for specific sites. It is not the intention that the Council acquires land. Whilst recognising it does have land holdings and will bring forward some	No change.

		area. Please do not paint a picture that suits your proposals without facts and is only a biased opinion that helps no one! Stick to the facts only please		developments, the vast majority of sites will be delivered by the private sector and other public sector bodies.	
	Managing Development	**1. Are there any other topic areas that you feel should be covered in Part 2?** In the south of the borough, better bus connections to /through Bell Green /Southend Lane must be planned in. Also tasteful high-quality design **2. Are there any topic areas that you feel should not be covered in Part 2?** N/A	**0**	Noted. The Local Plan is supported by an Infrastructure Delivery Plan which will help to ensure new development is appropriately supported by infrastructure, including for transport. The Council will continue to work with and lobby Transport for London for improvements to bus services.	No change.
	Managing Development	**1. Are there any other topic areas that you feel should be covered in Part 2?** I don't know **2. Are there any topic areas that you feel should not be covered in Part 2?** I'm just making random comments now as impossible to know which is relevant to what. How much more is there to comment on.	**0**	Noted.	No change.
	Managing Development	**1. Are there any other topic areas that you feel should be covered in Part 2?** Ensuring new developments do not fundamentally undermine existing homes - for example by impinging right to light **2. Are there any topic areas that you feel should not be covered in Part 2?** N/A	**3**	Noted. The draft Local Plan includes policies on amenity which address this matter.	No change.
	Managing Development	**1. Are there any other topic areas that you feel should be covered in Part 2?** Felexibility within design so that buildings and structure can be adapted easily rather than demolish and rebuild with is "ungreen" by being wasteful of energuy and material resources. **2. Are there any topic areas that you feel should not be covered in Part 2?** N/A	**2**	Noted. The draft Local Plan includes a policy on the Circular Economy which addresses these principles. However it is acknowledged that further detail could be provided on sustainable retrofitting.	Local Plan amended with new policy on sustainable retrofitting.
	Managing Development	**1. Are there any other topic areas that you feel should be covered in Part 2?** Yes - manage down any population growth in London / Lewisham - encourage people to move elsewhere in UK **2. Are there any topic areas that you feel should not be covered in Part 2?** Don't encourage development in this area -	**2**	Noted. National planning policy requires that Lewisham has a local plan to plan positively for sustainable development and to meet identified needs, including for housing. The London Plan also sets a housing target which the Council must meet through the Local Plan. The suggestion is contrary to national policy.	No change.
	Managing Development	**1. Are there any other topic areas that you feel should be covered in Part 2?** Reduce population growth in the borough **2. Are there any topic areas that you feel should not be covered in Part 2?** Instead of more housing, restrict the demand	**2**	Noted. National planning policy requires that Lewisham has a local plan to plan positively for sustainable development and to meet identified needs, including for housing. The London Plan also sets a housing target which the Council must meet through the Local Plan. The suggestion is contrary to national policy.	No change.
	Managing Development	**1. Are there any other topic areas that you feel should be covered in Part 2?** Further work should be done to allow residents to improve their homes and access to amenities. For example, first floor flat holders being able to install external staircases to their gardens, to replace original, old, steep and narrow internal stairs.	**0**	Noted.	Local Plan amended with new policy on sustainable retrofitting.

		2. Are there any topic areas that you feel should not be covered in Part 2? N/A			
	Managing Development	**1. Are there any other topic areas that you feel should be covered in Part 2?** No **2. Are there any topic areas that you feel should not be covered in Part 2?** High quality design should be a principle that underpins all topic areas rather than a stand alone item.	**1**	Noted. The design-led approach is a principle that runs throughout the draft Local Plan. There is a specific policy on high quality design that sets this out. The plan must be read as a whole.	No change.
	Managing Development	**1. Are there any other topic areas that you feel should be covered in Part 2?** Ensuring public transport really is available for what residents actually want and can use. **2. Are there any topic areas that you feel should not be covered in Part 2?** NO	**2**	Noted. The draft Local Plan Part 2 section on Transport sets out priorities and objectives to deliver investment and improvement to public transport infrastructure and services. The Local Plan is supported by an Infrastructure Delivery Plan which will help to ensure new development is appropriately supported by infrastructure, including for transport. The Council will continue to work with and lobby Transport for London for improvements to public transport.	No change.
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Delivering high quality Building heights Optimising site capacity **3. Please provide your comments on the topic(s) selected above** The new development in Lewisham Center is, in my opinion, a disaster: It is hostile to human well-being with its emphasis on "Optimising site capacity" and poor building design (it's in the eye of the beholder, but the two buildings closest to the railway station are just plain ugly). The area is still dominated by the busy road leading around it with pedestrians being exposed too much to it when either waiting for a bus or having to cross it to get from the shopping centre to the station. This new high-rise development was designed under similar "strict" conditions as the new plan lays out: "The building height of development must respond positively to the distinctive character of Lewisham's neighbourhoods. Building heights should be appropriate in scale, taking account of the character of a site's immediate and wider context" "Are sensitive to the site's context, ensuring that development does not excessively project above the streetscape and townscape or adversely impact on the visual amenity of it" How much can we trust these statements when whatever is proposed can be claimed to meet these requirements ? The high-rise buildings are too close reducing light and creating an oppressed feeling for pedestrians. How can they claim to be "appropriate in scale" ? I worry that something similar will happen to Catford. In my opinion the maximum height of any new building there should not exceed the current highest building. But it seems that you have	**0**	Noted. The Local Plan is required to be in general conformity with the London Plan and NPPF which requires policy to be flexible and not overly prescriptive. There is also a suit of SPDs and design guidance to support the Local Plan which provide more targeted detail. The Local Plan requires that new homes are of high quality but provides flexibility for the use of specific design principals (such as the type of balconies). The Local Plan Part 2 design section sets out requirements for tall building, in line with the London Plan. The London Plan directs that the Local Plan to identify locations appropriate for tall buildings and set parameters for building heights. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has been undertaken, which has informed the Regulation 19 document.	No change.

		designated Catford as another area that should be transformed from a medium height environment to a high-rise environment for reasons you state as urgent need for new housing, yet I believe more driven by the required commercial considerations. **4. Do you think that there are other approaches that should be considered?** Involve the community in the design of new developments. If the majority of the community declines a design and comes up with a more consensual one the council must consider it. Insist on passive house design. Required technology is now widely available. The addition cost is least significant if new builds are designed with this feature. Retrofitting is very expensive. Given that the council declared a climate emergency this should just be generally accepted. I wonder if the council has the strength to reject designs provided by developers if they do not meet the requirements laid out in the plan. Going by past experience of the planning of the Lewisham Gateway development (which in 2009 was a farce in my opinion and in 2017 with the "minor" amendment went almost all the developers way) the council and in particular the planning committee, that at that time also included the current mayor, does not seem to know how to get the best for Lewisham. It seems the planning officers often think that a proposed design meets the required standards with minor changes. Objectors were largely ignored. Catford seems to be in line to suffer the same fate, or expressed more eloquently in the plan "There may be locations where the prevailing heights of buildings adjoining a site and in its immediate and surrounding area may be expected to evolve over time. For instance, there are areas where the Local Plan, through the spatial strategy, provides support for the sensitive intensification of sites and areas" The plan states that "For example, some tower blocks built in the 1960s and 1970s detract from the historical townscape features within a neighbourhood, and are today considered not to make a positive contribution to local character" However, when these tower blocks were designed they were considered modern and progressive and any objections just displayed a backward attitude. I wonder what people in 50 years' time think about the current Gateway development or the soon to be developed Catford. **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** The recommendations of the Design Review Panel must be made public.		Local plan emphasise that higher density does not imply that tall buildings are necessary. Higher density can be delivered through a wide range of site layouts and building typologies, including mid-rise developments that are reminiscent of historic mansion blocks but with modern specifications. Design Review Panel reports can be requested through public access requests and are usually made public at committee stage.	
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Infill, backland, garden sites **3. Please provide your comments on the topic(s) selected above** Policy DQ11 fails to accord London Plan Policy H2 (Small Sites) and potentially provides tension with the Policy HO2 (Optimising the use of small housing sites) of the emerging Lewisham Local Plan.	**0**	Disagree. The Local plan does take a positive approach to planning for small sites and identifies a number of site typologies suitable for this type of development Small Sites guidance has been prepared to support local plan However a balance must be struck on small site development and meeting housing need and other local plan objectives, including for green space	Local Plan amended to reflect that the character of areas can evolve over time.

		The London Plan notes that “increasing the rate of housing delivery from small sites is a strategic priority” and calls for “positive and proactive planning” by boroughs to realise this (para 4.2.1). In order to achieve this, Policy H2 of the London Plan requires boroughs to “recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites”. It, therefore, seems in conflict with the London Plan that the draft Local Plan specifically singles out gardens in perimeter blocks urban typologies as normally being unacceptable for development. This broad-brush approach neither acknowledges that “local character evolves” nor that areas “will need to change” to accommodate housing on small sites. If a perimeter block was considered to have heritage value, then it would be designated as part of a conservation area or area of special local character. There are appropriate policy tests in the emerging Lewisham Plan (and elsewhere) that protect heritage assets, and others that properly protect residential amenity. Elsewhere, there are other policies that promote good design and urban design. Thus, the special treatment of development proposals in perimeter block locations – which might be acceptable in all other respects – seems unnecessary, unreasonable and contrary to the London Plan. Furthermore, the description of garden land that is provided at paragraph 5.81 includes any private amenity space that was ”originally designed” for that purpose. However, the character and, indeed, use of garden land could well have evolved materially over time since its original design and, as currently drafted, the Plan does not allow for such circumstances. Unless there is a heritage argument to the contrary (which would be covered elsewhere in the Plan), development proposals should be judged within a current, lawful context. Reference to the original design of a garden in the supporting text is, therefore, unreasonable and contrary the London Plan’s requirement that boroughs acknowledge that character evolves. **4. Do you think that there are other approaches that should be considered?** Overall, the policy tests set out in QD11 and supporting text provide an adequate basis to assess the acceptability or otherwise of development proposals in infill, backland, garden and amenity areas, without the need for singling out perimeter block locations. Moreover, the Characterisation Study provides an urban design baseline position to inform future development proposals. Therefore, the following sentence can be deleted without weakening the aims and objectives of Policy QD11: “This includes the development of back gardens for separate dwellings in perimeter forms of housing.” Similarly, those parts of paragraphs 5.91 and 5.92 that refer to perimeter block urban typologies / forms of housing should be removed. Additionally, for reasons given above we recommend that “as originally designed” be deleted from the description of garden land in paragraph 5.81 **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A		and character and therefore not supportive of garden land development in perimeter blocks. The Local Plan will be amended to reflect that the character of areas can evolve over time, in line with the London Plan, although the principles in the policy in terms of gardens and perimeter blocks will remain. The Council considers there is sufficient evidence to support this approach.	
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** Building to Human Scale **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Building heights Delivering high quality design Public realm	**0**	Noted. The Local Plan Part 2 design section sets out requirements for high quality design to ensure all new development should put people at the centre of the design-led approach, ensuring buildings and spaces are welcoming, inclusive, safe and accessible to all and that proposals	Local Plan amended to include new additional pint on design building to a human scale.

		3. Please provide your comments on the topic(s) selected above I would like to see building to human scale integrated into Lewisham's design guidance Good examples of the wording that can be used are found in Bexely councils residential design guide: ''The use within a development of elements which relate well in size to an individual human being and their assembly in a way which makes people feel comfortable rather than overwhelmed.'' ''The impression given by a building when seen in relation to its surroundings, particularly as experienced in relation to the size of a person'' 'The visual scale and massing of development can be reduced through the use of a variety of materials and features on building facades, a change in storey height and the articulation of corners that have a relationship with the street and a 'human scale'. **4. Do you think that there are other approaches that should be considered?** Related to human scale is height Particularly for areas not deemed appropriate for tall buildings in Lewisham's Local Plan I would like to see the Local Plan use wording used in Hounslow's Great Western Corridor's Masterplan and Capacity Study: ''Where the height differential between areas with different height approaches is more than two storeys, the abrupt change in height creates an imbalance and breaks the coherence of the urban fabric''. ''Higher development may feel domineering and undermine the integrity of buildings with lower height''. ''Generally heights should overcome strong height differentials through the stepping down of development at the interface with public realm''. ''Buildings may have one or two set-back storeys behind the main frontage. Due to their limited visibility from the street space set-back storeys have little impact on the perceived building height or enclosure of the street space''. ''The higher a building, the greater will be its propensity for harm, fuelled by developer ambition rather than any genuine pressing economic, regenerative or environmental driver''. **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A		should demonstrate an understanding of how people engage with and experience their surroundings, and respond positively to this by delivering healthy, liveable and walkable neighbourhoods.	
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** Standards in conservation areas and around listed buildings should be higher. The definition of quality is missing. Views of areas of special character (as well as from) should be considered valuable **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Delivering high quality design Building heights Optimising site capacity Amenity and agent of change	**0**	Noted. The Local Plan is required to be in general conformity with the London Plan and NPPF which requires policy to be flexible and not overly prescriptive. There is also a suit of SPDs and design guidance to support the Local Plan which provide more targeted detail. The London Plan directs that the Local Plan to identify locations appropriate	No change.

		External lighting Infill, backland, garden sites Alterations and extensions **3. Please provide your comments on the topic(s) selected above** Quality of design is highly subjective. Often meeting the basic planning regulations is deemed quality, when there is nothing aspirational about the design of new buildings. Many opportunities have been missed due to a lack of ambition in the local plan, beyond building something and maximising density at all costs. The aspirational statements made in the plan are vague and not backed up by commitments to hold developers to account - enhancements must be delivered to the wider area when large developments are built. Which aspects of proposals will be under the spot light and how will the council collaborate with developers? Councils do have the power to influence if there is a will to do so, this will enhance Lewisham in the long run. Just ok should not be good enough. **4. Do you think that there are other approaches that should be considered?** The design review panel should be used more extensively and their comments should be more visible. This is would provide more egalitarian outcomes and better developments. The definition of what is quality housing, seems to fall back on what meets the basic housing regulation requirements. Opportunities to build something truly life-enhancing that becomes an asset to the wider community are therefore missed. The lack of ambition to incorporate resident's ideas and fully understand how buildings, amenities, access routes etc are used, means that design quality is only assessed through the lense of architects and planners with limited knowledge of a place. Residents have a valuable perspective and the 'extensive consultations' are not independently run and invariably seek to steer the result towards a pre-determined outcome. Other local authorities and housing associations have embraced a workshop and design-led approach to engage communities and foster a sense of ownership. There is extensive research on this showing that fantastic outcomes can be achieved, a sense of ownership results in a better place to live for everyone. The benefits include a better quality of life, better mental and physical health etc. These goals are not given enough (if any) weighting when assessing quality. The notion of negotiation is missing in the mindset of the council and the developers. Rather, residents views are deemed to be ill-informed at best, more often dismissed off-hand. This does not build strong communities and the resulting legacy will be rather grim to look at and live with in decades to come. The definition of tall buildings as over 30m means that other developments which are significantly higher than their surrounds but not 30m tall, will escape the necessary scrutiny. This is very concerning considering the drive for densification. There is a responsibility that comes with building very large developments, the proposals do not hold developers to a high enough standard for enhancing an area. This is a huge missed opportunity, when the developers stand to gain so much, very little is being asked of them in return. **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?**		for tall buildings and set parameters for building heights. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has been undertaken, which has informed the Regulation 19 document. Local plan emphasise that higher density does not imply that tall buildings are necessary. Higher density can be delivered through a wide range of site layouts and building typologies, including mid-rise developments that are reminiscent of historic mansion blocks but with modern specifications. An Infrastructure Delivery Plan has been prepared alongside the Local Plan. This sets out infrastructure required to support the growth planned in the borough. Part 4 of the Local Plan sets out how new development must contribute to securing the delivery of infrastructure.	

		What does the definition an effective consultation and how is this measured? Without independent facilitiation, proper documentation, transparency, ballots etc it is not clear how this can be achieved.			
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Public realm **3. Please provide your comments on the topic(s) selected above** Public realm has to provide space for pedestrians keep them safe and protect them from pollution. The plan needs a strategy for pedestrians. Journeys on foot outnumber journeys made by other means but they never get the attention they deserve. The council should be asking what makes it nice to walk down a street and improve streets so they are all nice. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A	**1**	Noted. Local Plan part 2 Transport sections supported by The Manual for Streets following these principals. Part 2 Public Realm policy and Part 2 transport policies dealing with Healthy Streets Principles and this issue should be addressed in the Design and Access statement submitted by the applicant, and will need to address requirements of QD3 public realm.	No change.
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Delivering high quality design External lighting **3. Please provide your comments on the topic(s) selected above** Building Energy Policies need strengthening and targets for improvements over current developments need to be far higher to meet the Governments longer range targets NOW.... so that we are not putting up building that will require retro-fitting in the not too distant future. Development designs need to take into account the whole-life energy costs of their materials. Street lighting MUST take into account 'on pavement parking (where permitted). Currently, some streets that have their lighting only on one side (because it was 'easier' for the installer) leave the opposite pavement in the shadow of continuous lines of parked cars. Also, allowing street lighting posts to be up to a metre from the pavement has allowed some pavement to become inaccessible for wheel chairs and buggy (etc. users) - especially on days where rubbish and recycling bins are out for collections. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A	**0**	The Regulation 18 Local Plan document includes policies on sustainable retrofitting of existing building stock. However it is accepted that the plan can provide more emphasis and support for this.	Local Plan amended with additional policy to emphasise the importance of sustainable retrofitting of existing building stock.
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** N/A	**2**	Noted. An Infrastructure Delivery Plan has been prepared alongside the Local Plan. This sets out infrastructure	No change.

		2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below Delivering high quality design Inclusive and safe design Building heights **3. Please provide your comments on the topic(s) selected above** The developments in Lewisham town centre are design wise abject failures, some of the most unattractive developments with no cohesive approach to design of the individual schemes as a whole. Little public amenity has been gained from these developments but there is and will continue to be massive pressure on public services and infrastructure **4. Do you think that there are other approaches that should be considered?** More houses rather than flats, families need houses and gardens not high rise buildings. High rises destroy local character and communities. **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A		required to support the growth planned in the borough. Part 4 of the Local Plan sets out how new development must contribute to securing the delivery of infrastructure where appropriate by CIL and Planning Obligations.	
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** Some would appear to be mutually exclusive e.g density of build may require great height. This is not popular, results in poor design, dominates local communities excludes light, air and traps pollution.s, **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above** See the above. Increasing numbers of people impact the areas in many ways, noise, lighting, public realm, local amenities - schools, health care, open spaces, the natural environment. Has the council, or anyone in authority noticed the comments by the OBR in the government's most recent budget concerning the decline in population, which may be verified by the Census 2021? Density of population was one of the factors involved in the spread of Covid 19 in certain areas. **4. Do you think that there are other approaches that should be considered?** The London Plan was so long in the making and acceptance that many of issues extant 5 years ago may no longer be relevant. Government of any kind is all too often behind the curve, yesterday's people. If standing on Blackheath is any guide, more and more tower blocks are visible and encroaching on the open space and sky, from every angle. Is such an issue, impact from a distance, ever considered?	**3**	Noted. Local plan emphasise that higher density does not imply that tall buildings are necessary. Higher density can be delivered through a wide range of site layouts and building typologies, including mid-rise developments that are reminiscent of historic mansion blocks but with modern specifications. An Infrastructure Delivery Plan has been prepared alongside the Local Plan. This sets out infrastructure required to support the growth planned in the borough. Part 4 of the Local Plan sets out how new development must contribute to securing the delivery of infrastructure.	No change.

		5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan? Agreed, high quality design is very much required, but where are the examples of it? They are certainly not in the tower blocks in central Lewisham or Catford			
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Building heights Public Realm Delivering high quality design **3. Please provide your comments on the topic(s) selected above** The towers in the Gateway development are too tall and very ugly. It was a missed opportunity to integrate cycling infrastructure. There are not enough green spaces around the blocks for people in the new developments to use **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A	**2**	Noted.	No change.
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above** There seems to be a big disconnect between the plan aspirations and what is currently happening with development in lewisham and catford. Do we have to wait decades for any requirements for developers to consider the design and quality of buildings and their surroundings? As others have said, the tower blocks in central lewisham and the big estate at catford bridge are unnecessarily ugly and don't seem to comply with any of the aspirations set out in the plan. Please can you start considering design issues NOW not wait for a new plan to be agreed at some point in the future? **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A	**2**	Noted.	No change.
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below**	**2**	Noted. The Local Plan is required to be in general conformity with the London Plan and NPPF which requires policy	No change.

		Building heights Public realm Delivering high quality design **3. Please provide your comments on the topic(s) selected above** Overall: The plan and its principles seem quite vague. "Contribute positively to local character" and "ensure density is right for location" - what does that even mean? It's very open to interpretation and will likely be twisted to suit developers whose main objective will be to make a profit. I would have liked to see more stringent guidelines (although I admit I haven't read the detailed 69 page (!!) document - who has time for that?!) Building heights: You've "considered" setting limits of heights of buildings, but haven't decided to do so (I guess? it's not clear from the summary document). The new set of buildings in central Lewisham have gone way beyond what feels suitable for the location, every new one that goes up is higher than the last. I don't have a problem with some high rise blocks, but what is being created now is not at all in proportion to the area. Why can't they all be around 20 stories, no more, rather than this weird looking set of Lego buildings where every single one is different and it's not at all cohesive. It looks like a bunch of kids had a 'who can build the largest tower' competition. Public realm: Rules should be much stricter to make sure the ground floor of new buildings is actually utilised. For example for cycle storage, communal spaces (benches, communal resident-run libraries, play areas) and things like click-and-collect lockers for all the online shopping that everyone will be doing. Not just retail, which always takes ages to arrive, or never does, leaving the ground floor unoccupied and drab. We also need more public usable, green spaces for residents who live in flats. A really bad example is the space in front of the Premier Inn hotel near Lewisham station. It has potential to be a bit of a public space for lingering, maybe sitting down to meet a friend for a coffee, waiting for someone to arrive at the station. Instead the planters are neglected, no benches, and the phone line cable boxes are right in the middle of the space, making it a pain to navigate. Attention to detail needs to be given to those kind of mini spaces to make them usable, keep them clean and tidy, and not let them immediately deteriorate which is what seems to be happening. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A		to be flexible and not overly prescriptive. There is also a suit of SPDs and design guidance to support the Local Plan which provide more targeted detail. The London Plan directs that the Local Plan to identify locations appropriate for tall buildings and set parameters for building heights. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has been undertaken, which has informed the Regulation 19 document. Local plan emphasise that higher density does not imply that tall buildings are necessary. Higher density can be delivered through a wide range of site layouts and building typologies, including mid-rise developments that are reminiscent of historic mansion blocks but with modern specifications. Comments supported by Local Plan part 2 Design – Public Realm and connecting places policy and Amenity and agent of change policy.	
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Building heights View management Noise and vibration External lighting Alterations and extensions **3. Please provide your comments on the topic(s) selected above**	**3**	Noted. These matters are broadly dealt with by Local Plan part 2 Design policies dealing with amenity.	Local Plan housing design policies amended to refer to new Building Research Establishment good practice guidance on daylight and sunlight.

		To limit noise and light pollution trees between developments and blocks should be kept/introduced and maintained to aid this & serve as a natural barrier. Building blocks should not be dramatically higher than the trees surrounding them. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A			
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** The Local Plan would strongly benefit from the inclusion of Secured By Design **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Delivering high quality design Inclusive and safe design Public realm External lighting **3. Please provide your comments on the topic(s) selected above** I welcome the new plan and the vision it seeks to achieve. Social cohesion is much more likely to occur when residents feel safe within their own environments. To that end, I recommend that within the Local Plan, Secured By Design is adopted with regards to delivering high quality design, inclusive and safe design, public realm and external lighting. By the Local Authority ensuring that developers and architects work with Metropolitan police, Designing Out Crime Officers who will ensure that developments are safer, secure and that standards are adopted that are known to reduce the likely hood of crime. Independent studies have shown that adopting Secured By Design measures can lower crime by 87%. The use of third party tested and accredited, security doors and windows means that residents are less likely to be victims of burglary. Other methods, such as 'air lock lobbies' within residential flats, have a positive effect on reducing Anti-Social Behaviour which can have a serious impact on residents' quality of life. Designing Out Crime Officers using Secured By Design principles will look at all aspects of a proposal to make sure that residents, visitors or any other person within Lewisham feel safer within the built environment, both during the day or the hours of darkness. By reducing instances of crime and Anti-Social Behaviour the Local Authority and the local police save money which allows them to dedicate resources where they are needed, in turn it allows communities to thrive and grow. By reducing instances of criminal damage, arson and graffiti, the local authority saves money on replacing broken doors, repairing fire damage and cleansing services. There are many more benefits to adopting Secured By Design and I respectfully ask the Local Authority to note the experience gained by the UK police service over the past 30 years in this specific subject area. That experience has led to the provision of a physical security requirement considered to be more consistent than that set out within Approved Document Q of the Building Regulations (England); specifically the recognition of products that have been tested to the relevant security standards but crucially are also fully certificated by an independent third party, accredited by UKAS (Notified Body). This provides assurance that products have been produced under a controlled manufacturing environment in accordance	**1**	Noted. Local Plan part 2 states that we will strongly encourage the use of ‘Secured by Design’ principles.	No change.

		with the specifiers aims and minimises misrepresentation of the products by unscrupulous manufacturers/suppliers and leads to the delivery, on site, of a more secure product. For a complete explanation of certified products please refer to the Secured by Design guidance documents which can be found on the website www.securedbydesign.com **4. Do you think that there are other approaches that should be considered?** Only Secured By Design, using highly trained Designing Out Crime Officers specifies the standards required to lower instances of crime. **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** High quality design is undermined if it allows criminal activity to flourish.			
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above** The tower blocks are making me so depressed. Did you learn nothing from the Ferrier Estate? **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A	**1**	Noted. The London Plan directs that the Local Plan to identify locations appropriate for tall buildings and set parameters for building heights. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has been undertaken, which has informed the Regulation 19 document.	Local Plan building heights policy amended in line with Tall Buildings Study Addendum.
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Delivering high quality design Building heights **3. Please provide your comments on the topic(s) selected above** Lewisham's design track record over the last 20 years has been abysmal. In particular, the centre of Lewisham, which was always pretty unattractive, has been totally obliterated by recent developments, particularly the inappropriate and disfiguring high rise blocks. I have no problem with high-rise in general, but it needs to be appropriate in design, appropriately located, and assured of its fitness for purpose **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A	**4**	Noted. The London Plan directs that the Local Plan to identify locations appropriate for tall buildings and set parameters for building heights. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has been undertaken, which has informed the Regulation 19 document.	Local Plan building heights policy amended in line with Tall Buildings Study Addendum.
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** N/A	**4**	Noted. The London Plan directs that the Local Plan to identify locations	No change.

		2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below Public realm Delivering high quality design Building heights **3. Please provide your comments on the topic(s) selected above** Delivering higher density does not necessarily require tall buildings. Higher density housing should be designed for the human scale, encouraging a sense of community and ownership - tall buildings generally lack a sense of social cohesion and in most cases are ill-suited to suburban areas such as Lewisham. Similarly, new developments should be designed from the ground up, especially at strategic regeneration sites where the public realm is critical to the long-term success of a scheme. Generous open space which has equality of access for all occupants and visitors alike, should be at the heart of all major development schemes **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A		appropriate for tall buildings and set parameters for building heights. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has been undertaken, which has informed the Regulation 19 document. Local plan emphasise that higher density does not imply that tall buildings are necessary. Higher density can be delivered through a wide range of site layouts and building typologies, including mid-rise developments that are reminiscent of historic mansion blocks but with modern specifications.	
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Shopfronts Outdoor advertisements **3. Please provide your comments on the topic(s) selected above** Definitely the shopfront, signages, adverts must be improved across the borough, not just in conservation area. Cheap, brightly coloured, low quality design shopfronts and signage are an eye sore and make the area look cheap and run down. The council already have rules, though, regards what is expected from shop design, why isn't it already enforced? **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A	**3**	Noted. This matter is addressed by Local Plan Part 2 design policy on Shop fronts.	No change.
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** Improving the character of neglected streets **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Public realm **3. Please provide your comments on the topic(s) selected above**	**2**	Noted. This matter is largely addressed by the Local Plan Part 2 design policy on Public Realm and connecting places. The Local Plan includes a policy on housing estate maintenance, renewal and regeneration.	No change.

		Some of the housing estates built intra-war are looking tired; roads, pavements, and street furniture wasn't built to last as long as it now has. improvements to these estates would improve the quality of life and safety of residents who live in them and others who pass through them to green spaces **4. Do you think that there are other approaches that should be considered?** yes, not just focusing on parks and town centres **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A			
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** Permitting use of existing land **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Alterations and extensions **3. Please provide your comments on the topic(s) selected above** Alterations to allow safe use of existing amenity should be supported. For example where original features include unsafe internal stairs to reach a garden, the council should support safe external versions being out in place. **4. Do you think that there are other approaches that should be considered?** **N/A** **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** **N/A**	0	Noted. This matter is addressed by Local Plan Part 2 design policy on Building alterations, extensions and basement development.	No change.
	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** Scale of buildings. **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Building heights View management **3. Please provide your comments on the topic(s) selected above** New flats in Lewisham are too tall. They are impacting negatively on both view and a sense of well-being - they are threatening and creating a negative landscape/atmosphere. Lewisham is starting to look like a down market version of Croydon. Much more thought need to be given to the human scale of any development. **4. Do you think that there are other approaches that should be considered?** Scale is an issue that does not seem to play into the context of development in any meaningful manner and should be given greater consideration **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** Shop fronts and signage need to be more in keeping with the location.	**4**	Noted. The London Plan directs that the Local Plan to identify locations appropriate for tall buildings and set parameters for building heights. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has been undertaken, which has informed the Regulation 19 document. Local plan emphasise that higher density does not imply that tall buildings are necessary. Higher density can be delivered through a wide range of site layouts and building typologies, including mid-rise developments that are reminiscent of historic mansion blocks but with modern specifications.	Local Plan building heights policy amended in line with Tall Buildings Study Addendum.

	High Quality Design	**1. Are there other issues around design quality that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to design quality? Select the topic(s) and comment below** Delivering high quality design **3. Please provide your comments on the topic(s) selected above** The recent development around Catford Bridge Station/Doggett Road looks like a prison - VERY ugly, you could have insisted on better design - way too many plain brick walls, unrelieved by windows and/or 'living walls' and/or design features (texture/depth etc.) **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'High Quality Design' section of the Local Plan?** N/A	**1**	Noted.	No change.
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Lewisham's historic Environment **3. Please provide your comments on the topic(s) selected above** I predict that this statement "Any harm should be clearly and convincingly justified, and will be weighed against the public benefit of the proposal." will be abused to justify any harm towards historic sites. **4. Do you think that there are other approaches that should be considered?** Ask the community if a historic site is in danger of being harmed if they have any objections, and if they do, reject the planned damage. **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** N/A	**2**	Noted. The approaches to managing heritage assets and historic environment are considered to be consistent with national planning policy. The Statement of Community Involvement sets out how the public will be consulted during the planning process, including on planning applications.	No change.
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** The allocation and weight attributed to ASLC's should be further considered - as they risk becoming informal local conservation areas without appropriate consideration **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Non-designated heritage sites **3. Please provide your comments on the topic(s) selected above** Unlike designated Conservation Areas, that have been fully assessed, tested and formally adopted by the Council, the identification of the proposed list of Areas of Special Local Character does not appear to have gone through similar robust assessment and consideration. Whilst this might not apply to all LSLC allocations, I draw attention to the	**1**	Noted	Explanatory text on ASLC's has been amended to provide further clarity.

		Sydenham Extension ASLC - which takes in much of the run down Kirkdale High Street and extensive Willow Way employment area to the rear. This area does not appear to have been assessed and found appropriate for allocation as a non-designated heritage asset under the Lewisham Characteristic Study - requiring further reasoning for its identification as a potential ASLC. Given the desire to see the Willow Way employment area kick start and support the wider regeneration of the Kirkdale High Street area, it may be better to simply encourage high quality design and regeneration proposals though the relevant Site Allocation section of the draft LP. **4. Do you think that there are other approaches that should be considered?** The ASLC areas might best be referred to within the Local Plan, but subject to further formal identification and testing before future 'adoption' as supplementary guidance **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** N/A			
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Enhanced powers to protect the heritage architecture, communities and conservation areas which are being rapidly overwhelmed and watered down and lost in the rush for new development which often does not enhance or at worst damages our heritage assets. **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Enabling development Designated heritage assets Lewisham's historic environment **3. Please provide your comments on the topic(s) selected above** The Council needs to be seen to pursue best practice by conserving and supporting the restoration of historical neighbourhoods and assets. Lewisham should STRENGTHEN protections and stand firmly AGAINST developers who damage the fabric of our historical streetscapes and neighbourhoods and conservation areas and should only allow sensitive development which is aesthetically in keeping with our Victorian heritage--which is why most Lewisham residents choose to live here . **4. Do you think that there are other approaches that should be considered?** Development should only be approved where it is aesthetically sympathetic to nearby communities and design is strongly influenced by the historic buildings and communities in the proximity. The Conservation Societies which help to maintain standards for the boroughs should be funded for their extensive work supporting the Council and our communities. Planning proposals which are clearly infringing development rules (e.g 40 metre telecommunications in Conservation Areas) should be rejected outright by Council and not be put out to consideration causing huge amounts of stress and work for locals who have to then mobilize to try to fight to have them. Enforcement action by Council should be massively ramped up, so that alterations etc (both with and without planning permission) which break codes and break down the heritage aesthetic in or near Conservation Areas are looked for, found, and dealt with strictly and original features etc RESTORED to protect what makes Lewisham a place we want to live.	**3**	Disagree. The approaches to managing heritage assets and historic environment are considered to be consistent with national planning policy. The policies have been prepared with input from Historic England and Greater London Authority Archaeological Advisory Service. The draft Local Plan recognises the importance of preserving and enhancing the significance of historic high streets. Further details are set out in Part 3 of the plan, for the area based policies. Planning enforcement is outside the scope of the Local Plan. Whilst acknowledging the important contribution local community groups make to support the Planning Service, funding for organisations and societies is outside the scope of the Local Plan.	No change.

		Historic high streets - especially in places like New Cross Gate should be retained and redevelopments only allowed which add to them in ways which celebrate them architecturally and enhance them in the same, hamonious style **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** Gives free reign to developers. Waters down the protections of the Conservation Areas. Does not commit the Council to even uphold the protections in place in conservation areas when in fact these protections should be strengthened and enhanced and their scope expanded.			
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Enforcement **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above** There should be better policing of development policies. There is too much evidence of infringements which are not enforced **4. Do you think that there are other approaches that should be considered?** There should be more people in the relevant teams so that the council can actually enforce their existing policies **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** The council itself should stick to their own rules in conservation areas.	**1**	Planning enforcement is outside the scope of the Local Plan. Planning Service resources are outside the scope of the Local Plan.	No change.
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** I would like to see more specific language used so that the plan can less easily be circumvented **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Lewisham's historic environment **3. Please provide your comments on the topic(s) selected above** I would like to see more specific language used around heritage to show that Lewisham holds a strong stance on this A good example is Hounslow's 2019 Great Western Corridor Masterplan and Capacity Study, here are some excerpts ''The approach is to promote mid-rise buildings rather than very tall buildings, as they will be better able to avoid or limit harm to heritage assets''. ''There will be occasions where a tall or bulky development of a certain scale is simply unacceptable due to the potentially destructive effects on the setting of heritage assets''. **4. Do you think that there are other approaches that should be considered?** Historic England's Note 4 on tall buildings wording would also be a good model to include in the Local Plan	**3**	Noted. Following the Regulation 18 consultation the council has undertaken additional work on the Tall Buildings Study. This has informed the revised local plan approach on building heights.	Local Plan amended with more authoritative language where appropriate (e.g. development proposals 'must' instead of 'should' or 'will be expected to'). The building heights policy has been amended and is underpinned by further work in the Tall Buildings Study.

		''There will be some locations where the existing qualities of a place are so distinctive or sensitive that new tall buildings will cause harm regardless of the perceived quality of the design'' ''conservation area appraisals identify areas of increased sensitivity to tall buildings'' **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** N/A			
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Preservation of the Great North Wood and in particular the green area between the Telecom Mast in Horniman Drive and Have lock House. **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Lewisham's historic environment Designated heritage assets **3. Please provide your comments on the topic(s) selected above** The proposal to build housing units on the green area between the Telecom Site in Horniman Drive and Havelock House in Horniman Drive is unacceptable. The 15 mature oak trees are a remnant of The Great North Wood,. These trees and the others are essential for a number of reasons .Building on this site would threaten them and the wildlife which is found here. We have learned from the pandemic that we should preserve and respect nature. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** N/A	**0**	Noted. The draft Local Plan Part 3 sub-area policies recognise the contribution the remnants of the Great North Wood make to local character and distinctiveness.	Havelock House site allocation removed from the Local Plan.
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Avoid building new unsightly towers! **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Lewisham's historic environment Designated heritage assets **3. Please provide your comments on the topic(s) selected above** Look at the three red tower blocks on the A21 - at one time, those were considered the height of modern architecture and now, they are eyesores. Please do not continue to make the same mistakes - keep new builds low which will preserve the beauty of the area longer term! **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** N/A	**2**	Noted. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** The local plan should be clearer that development of back gardens in conservation areas will not be permitted - at the moment this is ambiguous	**2**	Noted. The draft Local Plan policy includes a policy dealing specifically with back gardens. This must be considered together with the local	No change.

		2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below None chosen 3. **Please provide your comments on the topic(s)** selected above N/A **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** N/A		plan policies on heritage, including those covering Conservation Areas. A blanket restriction on development in back gardens cannot be imposed as there are permitted development rights which enable some developments without the need for planning consent.	
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Enforcement for heritage buildings and areas must protect before damage takes place. **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Non-designated heritage assets **3. Please provide your comments on the topic(s) selected above** New developments must reflect the heritage of the area and there should be no more glass and steel high rises that are completely out of character. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** N/A	**2**	Planning enforcement is outside the scope of the Local Plan. The draft Local Plan sets out that all development proposals must follow the design-led approach and demonstrate how they will respond positively to local and historic character. The suggestion to impose a blanket restriction on glass and steel buildings is overly prescriptive in terms of use of materials and not consistent with national planning policy. Modern buildings and materials can be sensitively integrated into existing areas. This will be considered on a case-by-case basis through the development approvals process.	No change.
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Some genuine protection for conservation areas and an appreciation for how buildings interact. Selective application of policy remains a risk. **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Lewisham's historic environment Designated heritage assets Enabling development Non-designated heritage assets **3. Please provide your comments on the topic(s) selected above** The wording in the plan provides a loophole allowing the council to approve any damage to heritage assets that is 'justifiable' or provide 'public benefit'. This then overrides all of the protections outlined in the plan. No explanation of how the public benefit will be assessed or the transparency requirements for this decision making process. The protection of heritage assets needs to be consistent in order to be credible. Many of the conservation area descriptions are old and do not include all the valuable aspects.	**3**	The policies within the Local Plan provide a robust framework to preserve and enhance our heritage assets and are in line with national and regional policy and guidance.	No change.

		There cohesive design of areas is not valued or mentioned, this results in incongruous designs being approved. **4. Do you think that there are other approaches that should be considered?** The protection of heritage assets needs to be consistent in order to be credible. Planning decisions need a very high level of transparency from both the council and the applicant. Otherwise, the reasoning behind decisions is unclear and subjective. Where the council stands to financially benefit from a scheme, additional transparent and independent scrutiny should be applied. Clarification is needed on how the assessment is made. The conservation areas are meant to offer additional protection to mature trees, there is no mention of how TPOs, tree applications and heritage assets are interlinked. This have proven to be an area of poor communication in the past and the policy needs to be revised and adhered to in a transparent way. The conservation area appraisals don't appear to be regularly updated and other buildings of historic importance are without protection. **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** Transparency in protection policy and decision making is vital for local democracy.			
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Give weight to the quality of Sydenham Ridge Area of Special Character **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above** The historic and topological qualities of Sydenham Ridge have been ignored in the Local Plan, and the intention to give it a lesser designation as an ASLC is to be deplored, seemingly purely for administrative purposes! It is not just a local landmark, it stands for the whole of London and some of Kent; it is the source of some rivers flowing through much of Lewisham; and it provides welcome relief to many Lewisham and London-wide walkers to the urban sprawl. The character study of the area completely ignores the quality Victorian houses which many of us consider at the heart of this landscape and community, as well as the mid-century modern housing just across the border which should have set the standard for Lewisham. **4. Do you think that there are other approaches that should be considered?** If you won't keep the ASC designation, it should become a conservation area **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** Officers acknowledge that insufficient work has been done on Heritage.	0	Noted. The draft Local Plan proposes to remove the Area of Special Character designation, which is in the adopted plan. However the Area of Special Local Character recognition as non-heritage asset will remain. It is acknowledged that Sydenham Hill Ridge merits inclusion as an ASLC. This in combination with the draft Local Plan building heights and view management policies are considered to provide sufficient protection for the distinctive qualities of the ridge.	Local Plan amended to list Sydenham Hill Ridge as an Area of Special Local Character.
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** What about the borough's huge intangible cultural heritage. **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above** The plan currently focuses exclusively on tangible cultural heritage, but an enormous amount of Lewisham's strength and uniqueness comes from its intangible cultural heritage. Some	**0**	Noted. The Local Plan must deal with the use and development of land, in accordance with planning law. Policies which deal with 'intangible cultural heritage' therefore pose problems in terms of the legal remit of the plan. However, the draft Local Plan recognises and seeks opportunities to protect the borough's cultural assets	Local Plan amended to include reference to cultural assets, which should be considered in the design-led approach.

		thought should be given to encouraging places where this can be explored and shared so everybody's voice can be heard on an equal footing. My work with Made in Lewisham through Story Matters CIC has highlighted and promoted some of this but much more could and should be done and not just within the context of "Migration". Many of our communities have been here for decades now and have had a profound impact on the shape of Lewisham but this is rarely explored or recognised. **4. Do you think that there are other approaches that should be considered?** See above **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** N/A		and identity, where this can be achieved through the plan process.	
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Enabling development **3. Please provide your comments on the topic(s) selected above** I am much in favour of preserving the heritage of an area, and conservation areas can help do that. However I have personal experience of how flat and houses are treated differently in the area I live in. Houses are allowed to do works (e.g. replace windows) as long as they adhere to the area guidelines, WITHOUT asking for permission first (i.e. permitted development rights). Flats on the same street need to get permission for the exact same work first. This does not seem fair and puts an additional financial burden on flat owners, takes an enormous amount of time and effort and just puts people off doing maintenance and repair work altogether. Secondly, you need to update your guidance to make it fit for purpose and in line with carbon emission and environmental targets. We wanted to replace our windows with double glazed units and you were insistent they had to be made of timber, even though it is now possible to get heritage style double glazed windows made from UPVC which look IDENTICAL to timber windows, have a much longer lifespan, need less maintenance and are cheaper. Allowing those to be used would encourage more people to update their properties, make them more environmentally efficient and reduce energy use. Houses on our street have used them (as they didn't need to ask for permission, see 1st paragraph) and because visually it's impossible to tell there has been no penalty for those properties. Why can't flat owners use them too? It just seems ludicrous. No wonder people don't look after their properties if it's being made this hard! **4. Do you think that there are other approaches that should be considered?** None chosen **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** N/A	**1**	Noted. Permitted Development Rights and planning enforcement are outside the scope of the local plan. Whilst it is acknowledged that sustainable retrofitting measures have many benefits in terms of property management and responding to the climate emergency, a balance must be struck in terms of preserving and enhancing the significance of heritage assets and their settings. Where planning permission is required for householder works, such as replacement windows, this will be considered on a case-by-case basis.	Local Plan amended with additional policy on sustainable retrofitting.
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Enforcement of changes and council staffing **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Lewisham's historic environment	**2**	Noted. Planning enforcement, Planning Service resources and the making of Article 4 Directions are outside the scope of the Local Plan.	No change.

		Non-designated heritage assets **3. Please provide your comments on the topic(s) selected above** Constantly changes without permission are made but there is no enforcement in Lewisham. There is also not enough conservation officers. The council has messed up the future of ladywell baths by taking away the conservation officer on this absolutely key project. **4. Do you think that there are other approaches that should be considered?** Get more conservation officers, issue article 4 directions on locally listed buildings **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** It means nothing if not enforced. Need a new heritage champion on council who is passionate about the role and fights for heritage			
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Non-chosen **3. Please provide your comments on the topic(s) selected above** The example of Ladywell Playtower & Curzon Cinema proposal may give some useful pointers on how heritage planning works in practice. Following the initial public consultation there appears to have been a halt in the development, and I'm not sure that there have been public updates. So - heritage planning may need to ensure subsequent regular updates on progress (or lack thereof). **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** N/A	**2**	Noted.	No change.
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Seems fine - but I notice the Local Listed buildings list on the Council website has not been updated since February 2014 **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Non-designated heritage assets **3. Please provide your comments on the topic(s) selected above** Again, the list of non-designated assets on the Council website has not been updated since February 2014 - time for a refresh, if only to give the impression that it is still relevant **4. Do you think that there are other approaches that should be considered?** No **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** Good to see emphasis on development outside, but proximate to a conservation area, needing to not impact on the conservation area.	**0**	The Local List is subject to periodic review and updating. This review is undertaken separately from the plan-making process.	No change.
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?**	**0**	Noted.	No change.

		N/A **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Lewisham's historic environment Designated heritage assets **3. Please provide your comments on the topic(s) selected above** You seem to have this about right. **4. Do you think that there are other approaches that should be considered?** **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?**			
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Manor House library **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Lewisham's historic environment **3. Please provide your comments on the topic(s) selected above** Part of Lewisham's heritage is the Manor House Library and its accompanying family history. It is outrageous that nearly a year after Lewisham's Labour regime supinely succumbed (as usual) to the anti-democratic Black Lives Matter movement and covered over the maroon Baring family name on the side of the library, only after appallingly inefficient undocumented "discussions, that still nothing has been done about removing that defacement cover. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** N/A	**1**	This is beyond the scope of the Local Plan consultation	No change
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Yes, the fact that Southwark borough is invading public spaces on the western borders of Lewisham by creating more graveyards in public spaces. (Honor Oak) **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Lewisham's historic environment **3. Please provide your comments on the topic(s) selected above** It's too late to do anything about an historical environment in Lewisham - don't bother. Demolish old buildings. **4. Do you think that there are other approaches that should be considered?** It's too late - many open spaces were lost by developments in Victorian and mid-war times. If a meteor landed on some of the 1930s suburban sprawl there might be an opportunity for a better way forward. **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** **N/A**	**0**	Disagree. The Council considers that there are a wide range of heritage assets that merit conservation and protection through the planning process. The Local Plan sets out policies to support conservation in line with the National Planning Policy Framework. Development proposals and construction in Southwark and other neighbouring Boroughs is outside the scope of Lewisham's Local Plan.	No change.

	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Yes, the fact that Southwark borough is invading public spaces on the western borders of Lewisham by creating more graveyards in public spaces. (Honor Oak) **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Lewisham's historic environment **3. Please provide your comments on the topic(s) selected above** It's too late to do anything about an historical environment in Lewisham - don't bother. Demolish old buildings. **4. Do you think that there are other approaches that should be considered?** It's too late - many open spaces were lost by developments in Victorian and mid-war times. If a meteor landed on some of the 1930s suburban sprawl there might be an opportunity for a better way forward. **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** N/A		Noted. Development proposals and construction in Southwark and other neighbouring Boroughs is outside the scope of Lewisham's Local Plan.	No change.
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Lewisham's historic environment Non-designated heritage assets Enabling development **3. Please provide your comments on the topic(s) selected above** Heritage is important to neighbourhoods but this does not seem to be recognised by the administration. the way the Council has ignored the Ladywell Playtower for instance sends out a strong message that they do not care about heritage. The naming of Fir Tree Way next to a historic mulberry tree is another local example. There will be others of which I am not aware and words on paper are no substitute for purposeful action. **4. Do you think that there are other approaches that should be considered?** Have greater regard to the voice of the local coounity when anything impacting on heritage is concerned. The local people have to live with the consequences long after local councillors have gone. **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** N/A	**5**	Noted. The draft Local Plan sets out policies to conserve and enhance heritage assets and Lewisham's historic environment, which are considered to be consistent with the National Planning Policy Framework. The Council's adopted Statement of Community Involvement sets out how the public will be consulted on the preparation of planning documents and on planning applications.	No change.
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Support for conservation areas **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Designated heritage assets **3. Please provide your comments on the topic(s) selected above**	**5**	Noted. Decisions on previous planning applications are outside the scope of the Local Plan. The Local Plan includes a refreshed suite of policies addressing Lewisham's historic environment, which are considered to be consistent with national planning policy. The	No change.

		You write " F Development on sites adjacent to a Conservation Area must not have a negative impact on the setting or significance of the Conservation Area." yet we have been encroaching on small conservation areas in central locations not taking into account how raising rooflines on nearby streets negatively impacts the character of an area **4. Do you think that there are other approaches that should be considered?** A commission should be established to liaise with residents of conservation areas to ensure their voices are heard as it seems the council is not interested in preserving these special areas **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** No		local plan will work together with Conservation Area Appraisals and Management Plans to set a positive framework for conservation, including for Conservation Areas. The Council's adopted Statement of Community Involvement sets out how the public will be consulted on the preparation of planning documents and on planning applications.	
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** I think there should be no mural painting on historic buildings. **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** Lewisham's historic environment Designated heritage assets Non-designated heritage assets **3. Please provide your comments on the topic(s) selected above** I think it is really important that Lewisham's historic buildings are sensitively restored and the restorations should be an opportunity to declutter and refresh. The in-your-face painting on the front of the Ninth Life building is heavy and cluttered and means the architecture of this important building is lost. I hope that the mural will be removed and the facade brought back to its original beauty. **4. Do you think that there are other approaches that should be considered?** Sensitive restorations of historical buildings bringing them back to their original state. No murals. **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** As above	**4**	The policies within the Local Plan provide a robust framework to preserve and enhance our heritage assets and are in line with national and regional policy and guidance.	No change.
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Cosmetic treatment of historic buildings **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above** I do not know where this would fit into the plan but in my opinion the Nine Lives pub in Catford (opposite the Broadway Theatre) is an absolute eyesore, definitely NOT in keeping with the historic town centre, and it should never have been allowed. **4. Do you think that there are other approaches that should be considered?** **N/A** **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?**	**3**	The policies within the Local Plan provide a robust framework to preserve and enhance our heritage assets and are in line with national and regional policy and guidance.	No change.

		N/A			
	Heritage	**1. Are there other issues around heritage that the Local Plan should address?** Local heritage is underpinned by the information available around it - better funding for the local history library and archives is vital so that these irreplaceable materials are preserved and made accessible for future generations. That means more staff and investment in the systems that they use to underpin their work. **2. Do you have any comments on the proposed approaches to heritage? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above** **N/A** **4. Do you think that there are other approaches that should be considered?** Proper funding of the local history library and archive, to support the work around exploring and promoting the heritage of the borough **5. Do you have any additional comments on the 'Heritage' section of the Local Plan?** N/A	**4**	Noted. Whilst it is acknowledged that archival and library resources are an invaluable tool to support conservation, Planning Service resources are outside the scope of the Local Plan.	No change.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Genuinely affordable housing **3. Please provide your comments on the topic(s) selected above.** Received an email from Knight Frank/ Peabody partnership - offering: Arden - Parkside properties From studio - 1, 2 beds and duplexes From £350 000 Well done Lewisham - pat yourselves on the back there! £350k for a studio. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A	0	The Council has prepared a Strategic Housing Market Assessment that considers the need for affordable housing and assesses the affordability of different tenure options. The findings of the study have influenced the policies in the Local Plan. The draft Local Plan includes policies to secure genuinely affordable housing, with affordability linked to local income levels. Development which has been consented and properties currently marketed for rent or sale, are outside the scope of the Local Plan.	No change.

	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Meeting Lewisham's Housing needs **3. Please provide your comments on the topic(s) selected above.** The assumptions about population growth look like you are assuming linear increases. Over the last year London has lost around 700000 people, due to Brexit and covid. Have plans for a range of scenarios been considered? Working from home may also require further flexibility in the types of retail space available as people will be concentrated in local areas more than travelling into the centre. Will the proposed housing be genuinely affordable, and will the designs foster community interactions, eg. by not designing two-tier developments with features such as "poor doors" for some residents **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** No	3	The draft Local Plan seeks the maximum amount of genuinely affordable housing to be delivered on new housing developments with 10 units or more and includes a strategic target for 50% of housing to be genuinely affordable. It also seeks to ensure all residents within mixed tenure schemes have access to amenities, communal spaces, including play spaces, and that access (i.e. cores and lifts) to affordable housing and market units is indistinguishable. The Local Plan covers a 20-year period. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues. This includes the latest population projections prepared by the Greater London Authority which continue to project growth in London over the long-term.	Additional evidence base documents have been prepared to inform the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Genuinely affordable housing Houses in Multiple Occupation **3. Please provide your comments on the topic(s) selected above.** Question: What will the council do if the developer says 50% genuinely affordable housing is commercially not viable and demands a reduction in this target? Change developer or agree to the reduction? Can the council not build more homes itself, keeping ownership and benefiting from a long term rental income at genuinely affordable rent? In my opinion HMOs are not really desirable except for student accommodation and temporary housing for homeless people. Ultimately, over the long term, people want to life in their own home. Leasehold should be banned in favour of shared freehold. **4. Do you think that there are other approaches that should be considered?** N/A	1	The Local Plan has been informed by a Viability Assessment which demonstrates that the policies are deliverable. Where applications propose that policy requirements for affordable housing cannot be met owing to financial viability, these will be refused by the Council unless it can be suitably demonstrated through the applicant's own Viability Assessment that the maximum viable amount of affordable housing will be delivered. This is consistent with regional and national planning policy. The Local Plan sets a strategic target for genuinely affordable housing is set at 50%, with affordability linked to local income levels. Private developments and registered housing providers will make a	Local Plan HMO policy amended to provide further details on managing the harmful overconcentration of HMOs.

		5. Do you have any additional comments on the 'Housing' section of the Local Plan? N/A		significant contribution to delivering more affordable housing. In addition, the Council has embarked on an ambitious home building programme to build new genuinely affordable homes. The London Plan makes clear that HMOs make an important contribution to meeting London's housing needs, such as those requiring temporary accommodation. The Lewisham Strategic Housing Market Assessment also corroborates this. The draft Local Plan includes policies to manage the harmful overconcentration of HMOs, however it is acknowledged that further details could be included to aid policy implementation. The Council also has an HMO licensing scheme to ensure HMOs provide suitable occupation, however this is separate from the Local Plan.	
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Genuinely affordable housing **3. Please provide your comments on the topic(s) selected above.** A question with regard to genuinely affordable housing: If in a new housing development there is a mix of genuinely affordable housing (rental or purchase ?) and "affordable" or market rate housing who has the right to apply for the genuinely affordable housing assuming it is of the same standard as the market rate housing ? **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A	1	The Council's Lewisham Housing Allocations Scheme seeks to fairly allocate social housing to eligible applicants on the housing register. Details can be found on the Council's website.	No change.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** short term letting servcies like AirBnB; an increase in home working; the physical & mental health benefits of open space; the climate crisis; Lifetime Homes; the Council's failure on geneuinely affordable homes **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Meeting Lewisham Housing needs	2	The Regulation 18 public consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement. To support the consultation, the Council prepared a Local Plan Summary Document.	No change.

		Genuinely affordable housing Housing design Public involvement: AirBnB; Climate crisis;Home working **3. Please provide your comments on the topic(s) selected above.** If the Council genuinely wanted to encourage the involvement of residents (by definition, non-specialists) in the planning process it would make a real effort to publish material in plain English and eliminate repetition. It is disappointing that it has failed to do so. The Council needs to take action on holiday letting services such as AirBnB. These reduce the number of long term homes available as well as distort an already dysfunctional housing market and rents. Where is the plan to deal with this problem? **4. Do you think that there are other approaches that should be considered?** It is good to set a target that 50% of new homes should be “affordable” but that should be the minimum. In reality it’s the same as the current target which Lewisham does not meet it. Even in developments where the Council has a direct financial interest it fails to meet its own target. How will it actually meet the re-stated target? References to “genuinely affordable” homes are welcome but again, the Council has failed to meet the existing targets. The intermediate categories (London Living Rent / shared ownership) in reality do not meet Lewisham's needs. Allowing 30% of supposedly affordable homes to be from the intermediate category is an abject failure. **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** There is no denying the housing crisis in Lewisham. By its own figures 7.6% of Lewisham households are categorised as homeless. The average house price is way in excess of a reasonable multiple of the median income. The housing market does not function efficiently but the Council plans to continue relying on the goodwill of private developers. There will in effect be no change to current practices. It is time to recognise that doing the same thing over and over will provide the same end result – unaffordable housing and homelessness. Lewisham’s Local Plan is a huge missed opportunity		Holiday letting of residential properties is outside the scope of the Local Plan but the Local Plan recognises the importance of conventional housing not being compromised by the unlawful use of residential premises by visitors and specifies that serviced apartments will not be occupied for periods of 90 days or more, in line with legislation. Planning enforcement, however, it outside the scope of the Local Plan. The delivery of new affordable housing fluctuates on a yearly basis and is often dependent upon site viability and developer interest in bringing forward development. The Council will monitor delivery of housing through its Authority Monitoring Report. The Local Plan is in conformity with policy H6 of the London Plan which specifies a tenure split of 30% low-cost rent, 30% intermediate products and the remaining 40% to be determined by Councils. In recognition of the need for genuinely affordable housing in Lewisham, the Local Plan seeks that all of the remaining 40% is for low cost rent, thereby minimising intermediate provision as much as possible. The Local Plan does assume new house building will take place on private developments. But it also recognises the importance of housing estate renewal and regeneration and the Council has embarked on an ambitious home building programme to build new genuinely affordable homes.	
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** None selected	0	Noted. The threshold approach to viability set out in the draft Local Plan aligns with policy H5 in the London Plan. Where the required levels of affordable housing cannot be met, this must be demonstrated by a Viability Assessment.	No change.

		3. Please provide your comments on the topic(s) selected above. Policy HO3 F positively recognises and supports the threshold approach to viability for major development proposals, in accordance with draft London Plan policy H6 , taking into account the different routes to affordable housing delivery (i.e. Fast Track Route and Viability Tested Route). In this regard we note that Lewisham have adopted the normal minimum threshold position of 35 per cent; or 50 percent for Strategic Industrial Locations and Locally Significant Industrial Sites where development would result in a net loss of industrial capacity. The wording of this final policy requirement/aspiration should be made less prescriptive, as it is not always possible to achieve the desired regeneration that provides, private/affordable /employment floorspace & amenity space and wider regeneration benefits without some reasonable flexibility - if one is to bring the site forward in a viable and deliverable form **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A			
	Housing	**1. Are there other issues around housing that the Local Plan should address?** Building more homes by encouraging and enabling development in all parts of the borough, not just in town centres and on brownfield sites **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** None selected **3. Please provide your comments on the topic(s) selected above.** I am in favour of more housing and of making the best use of scarce land by building to high densities. People need homes, and shops, services and public transport all need customers, particularly in a post-pandemic world. But it's vital that the council doesn't only allow development in deprived town centre areas while restricting it in existing residential neighbourhoods. Those neighbourhoods are perfect for creating new family-sized homes that would also, unlike the existing Victorian and Edwardian stock, be energy-efficient and accessible to people with mobility problems. These neighbourhoods are disproportionately white and affluent so "protecting" them from development in the name of "character" just accentuates existing inequalities of wealth and opportunity. **4. Do you think that there are other approaches that should be considered?** The local plan should therefore do more to encourage incremental development in existing residential areas, in line with London Plan policy which states that "local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites" **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A	0	Agree. The Local Plan seeks to ensure the development proposals respond positively to the distinctive character of Lewisham's neighbourhoods and communities by following the design-led approach. The Local Plan also seeks to facilitate the sensitive intensification of established residential neighbourhoods and commercial areas through the development of small sites, particularly to help meet the London plan small sits housing target. The Council has also adopted a Small Sites SPD to help give effect to the London Plan and new Local Plan small sites policies.	No change.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A	0	Whilst the Council has a Lewisham Housing Allocations Scheme which seeks to fairly allocate social housing to eligible applicants on the housing	No change.

		2. Do you have any comments on the proposed approaches to housing? Select the topic(s): Genuinely affordable housing **3. Please provide your comments on the topic(s) selected above.** I support the targets for more genuinely affordable housing (& for it to be genuinely affordable rather than "affordable") This needs to extend to purchase as well as renting (so that people on average-ish incomes can afford to buy in Lewisham as they used to be able to) Challenge of providing for people with local connections & not just attracting people to move to to area More needs to be done to look at "planning gain" so that the scarcity value of a site goes primarily to the community/ tenant/ owner occupier (whilst there) rather than to owners of sites (though this would primarily need to be changes in national policy) **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A		register and can be found on the Council's website, the price of renting private properties or buying market sale properties, and who can move into these properties, is outside the scope of the Local Plan. The Local Plan requires viability assessments to be submitted to support proposals for affordable housing that do not meet the minimum threshold. The Council periodically reviews large schemes to check if improvements to the site's financial viability allow for additional affordable housing to be delivered. The requirements and procedures for these 'review mechanisms' are set out in the draft Local Plan and London Plan housing guidance.	
	Housing	**1. Are there other issues around housing that the Local Plan should address?** Re-provision of retail or community facilities under housing developments **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Housing Design **3. Please provide your comments on the topic(s) selected above.** Housing above retail From the many retail sites in the South area identified as potential sites for housing development each site has a retention of retail for the entire ground floor with housing above. Can this be looked at again in the light of number of issues some of which may have changed or accelerated due to the pandemic 1. Retail is in decline 2. Housing need is higher than need for retail 3. If regulations state that some retail (specific m2 or specific number of employment opportunities) must be re-provided can it be limited only to what is legally required so that the maximum units of housing are achieved) 4. Housing above shops has long been problematic and probably the least desirable for tenants or certainly homeowners. disturbance of the running of any retail from early / late deliveries, any retail selling food or cooking food causes numerous issues for housing above in terms of health and safety secure refuse storage of food waste/ fire safety, noise from pubs/ gyms, community halls holding social events such as weddings, funerals, parties.	2	Noted. The draft Local Plan supports appropriately located mixed-use development, particularly in town centres, in order to make a more efficient and optimal use of land. This normally involves commercial and/or other main town centre uses at the ground floor level with residential above. The approach is generally supported by the London Plan. This development typology has been successfully delivered in Lewisham and London. However it is acknowledged that some developments have not resulted in high take up of space. The draft Local Plan introduces a new suite of design policies to help ensure that mixed-use developments are of a high quality, for example, with flexible space with an appropriate level of fit out to encourage take up. The Local Plan has been informed by a town centre study, which sets out future retail floorspace requirements. This suggest there is a modest for still notable need for new floorspace to be created or repurposed over the long-term.	No change.

		Current housing with retail on ground floor If you take recent examples in Lewisham where it has been difficult to find businesses to take on retail units under housing you can see that this strategy might leave empty units which could have been housing people from the housing list Lewisham station tower blocks – it seemed to take a long time to fill the units under the 1st phase tower blocks and most are not typical retail that locals use. Flats at 262 to 274 Lewisham High St – retail space on ground floor (previously as Tesco) has been empty for several years now. Ladywell Pop-Up housing – the temporary, movable housing heralded the retail units for local small businesses etc but it appears that it has been difficult to attract tenants to these units with some seemingly empty with the retail / business or office use not adding anything to the area except the Hope cafe whilst it was operating which was hireable for events and the cafe providing a place for community to meet. Flats at 335-337 Bromley Rd – one unit occupied by Co-op whilst the corner retail unit with high visibility from Bromley Rd and Whitefoot Lane/Southend Lane remained empty and eventually was converted to a flat providing one more unit of housing 22 and 24 Sydenham High Rd, SE26 5QW Retail Space under flats was taken on by a Yoga centre which has failed to be successful and I think it has now been agreed that the ground floor can become residential units **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A			
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Gypsy and traveller accommodation, Student accommodation **3. Please provide your comments on the topic(s) selected above.** Gypsy and Traveller Site Applaud council providing one site for Travellers although as I commented at the time of consultation re Pool Court that it did not seem an ideal site being accessed by one road only and potentially being quite dangerous being so near to the river with possible health and safety risks if children were on site as well as large presence of rats being near water. Not sure if one site is sufficient for the area but would encourage the council to continue to find appropriate locations for further sites. Hope that the council will resist use of the new powers to arrest, fine and remove vehicles on public land in the new Police, Crime, Sentencing and Court Bill. Student Accommodation	0	Noted. The Council has undertaken feasibility work on the proposed gypsy and traveller site at Pool Court, and it is considered that this this type of housing development can feasibly be delivered there. The Local Plan therefore proposes to include a site allocation to address the housing needs for this group. The site can accommodate the borough's objectively assessed need for pitches, as set out in the latest Gypsy and Traveller Needs Assessment study. Provisions in the Police, Crime and Sentencing Bill are outside the scope of the Local Plan. Since the Regulation 18 consultation on the draft Local Plan, the Council has prepared an update to the Strategic Housing Market Assessment	No change.

		Student Accommodation Applaud council stating that they will only grant permission for further student accommodation where the need can be demonstrated and where the accommodation is for students from one or two specific universities or colleges locally. Giving the high number of student units being built in the high-rise tower blocks by Lewisham station it seems imperative to see how well these are occupied and if any issues arise from such a large number of students (who would not necessarily be resident during long holiday periods) living in a high-rise environment with the possible concerns re access to green spaces etc **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** To many to mention…		(SHMA) that has considered the need for purpose built student accommodation. The results of the study have influenced the policies in the Local Plan, and confirms the need to take a carefully managed approach to additional purpose built student accommodation in the Borough.	
	Housing	**1. Are there other issues around housing that the Local Plan should address?** I accept that Housing is a very important issue but not all development sites are suitable. The proposal to build housing units in the green area between Havelock House and the Telecom site is totally unacceptable and unsuitable. It also goes against the council's aims to consider nature and protect the green areas that already exist. n the **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Other: Protecting and preserving green areas **3. Please provide your comments on the topic(s) selected above.** Same as above **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A	1	Noted.	Havelock House site allocation has been removed from the Local Plan.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Meeting Lewisham’s Housing needs **3. Please provide your comments on the topic(s) selected above.** The proposal to increase the number of potential households on the New Cross Sainsbury's site from 200 to 900 is a terrible idea. This part of the borough already has very limited access to green space and leisure facilities. This proposal should be abandoned. **4. Do you think that there are other approaches that should be considered?** Yes, instead of 1/2 bedroom properties, build actual family housing, 3,4 and 5 bedrooms, in a genuine attempt to reduce the housing waiting list. **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A	3	Noted. The Council has prepared a Strategic Housing Market Assessment (SHMA) that has considered the need for housing in the borough, including dwelling size mix. The draft Local Plan seeks to ensure that development proposals deliver a mix of housing tenures and types. It also includes policies to protect the stock of existing family homes, with policies that restrict conversions unless family sized (3+ bed) units are retained or re-provided. However it is acknowledged that further details on the need for family sized units could be provided.	Local Plan amended by making additional references to family housing and the needs of families and young children. Local Plan amended to include a target housing size mix for affordable housing.

	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Meeting Lewisham's Housing needs **3. Please provide your comments on the topic(s) selected above.** Meeting the housing targets seem to be the overriding aim, against all other aspirations will be set aside. Population changes are dynamic and it is not yet clear whether projections will indeed be accurate, particularly given Covid 19 uncertainties. Over development that is inappropriate within the borough will diminish its attractiveness for people to want to live in the borough. **4. Do you think that there are other approaches that should be considered?** Lewisham should join with other inner London boroughs to resist targets that lead only to higher buildings and intensification of housing. the aim is have a borough that is open and liveable. that will not be achieved if tall blocks are crammed into all developments **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** Housing developments should be a mix for all ages	4	The London Plan sets a strategic housing requirement (i.e. housing target) for Lewisham, which the Local Plan must demonstrate how it will deliver. The Council recognises that the new London Plan housing targets are challenging. However the respondent's suggestion to resist housing targets cannot be taken forward, as this would not be consistent with national planning policy. The Council disagrees that meeting housing targets is the overriding aim of the Local Plan. Whilst there is an imperative to address the housing crisis and deliver more genuinely affordable homes in Lewisham, this is not the plan's sole focus. The Local Plan sets out objectives and policies across a wide range of policy topic areas. These include, for example, economy and culture, open spaces and green infrastructure, responding to the climate emergency and delivering new infrastructure to support growth including community and transport infrastructure.	No change.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Genuinely affordable housing, Houses in Multiple Occupation **3. Please provide your comments on the topic(s) selected above.** Lewisham needs to recognise and respond to the housing situation for what it is: a crisis. Too much focus in the plan is on bought homes, when most people rent privately, and both national and local strategies focus less on renters. There needs to be a concerted effort to track down and hold to account unscrupulous landlords, build more social housing, introduce rent controls, and put a stop to expensive developments which are bought as rental properties. The issue will not be solved just by building more homes, we need to meet the desperate need of renters now by cracking down on slumlords and rising rents which make the area unaffordable **4. Do you think that there are other approaches that should be considered?** N/A	2	The Local Plan recognises that the private rented sector is growing and that this is an unaffordable option for many residents. In light of this the plan seeks that new developments make provision for maximum amount of genuinely affordable housing, with a strategic target of 50% of all new homes delivered to be genuinely affordable, with affordability linked to local income levels. The Council is also undertaking an ambitious home building programme to build new genuinely affordable homes on Council owned land.	No change.

		5. Do you have any additional comments on the 'Housing' section of the Local Plan? N/A			
	Housing	**1. Are there other issues around housing that the Local Plan should address?** ACTION IS NEEDED! **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Optimising the use of small sites Genuinely affordable housing Housing design Self-build and custom-build **3. Please provide your comments on the topic(s) selected above.** All we hear about is - 'Genuinely affordable homes'. Lewisham median income is £30.000 (x5 - mortgage lending potential --> £150.000) If you're lucky enough to have 1 year gross salary in savings, which is impossible to save, because 70 - 80% of your salary goes on living costs (other people's mortgage); that takes your home buying budget to £180.000. ***Please let us know, where in Lewisham, we can buy a 1 bed place for £180.000*** You are also referring to to 'London living rent' & 'Social rent'. How do we find about about these rental properties? Where do they exist? Where are they listed? I have been staring at the 'Homes for Londoners' website for 2 years now, and yet to see anything in my area.. I email the council, no response for weeks/ months - eventually someone calls me; they are not even aware of the site, or the type of rents available there.. I ask again, months later - no response.. Where do we find out about any possible way out of this awful situation, where we live with zero disposable incomes, zero hope of improvement, medical needs, zero prospects for home ownership.. it is impossible to sustain living in privately rented properties, with deteriorating mental and physical health.. What can we do? Will we be able to see any properties available under the first homes scheme, approved by the government in 2020? The shared ownership is a complete CON! The help to buy mortgages for new builds require do little more than inflate house prices, and serve no purpose to low and middle income individuals. Please stop supporting this non-sense, trying to pass is as affordable. I am desperate to hear some concrete advise and answers **4. Do you think that there are other approaches that should be considered?**	3	The Local Plan recognises and seeks to respond to the housing crisis and particularly the issues of housing affordability. The draft Local Plan seeks that new developments make provision for maximum amount of genuinely affordable housing, with a strategic target of 50% of all new homes delivered to be genuinely affordable, with affordability linked to local income levels. The Council is also undertaking an ambitious home building programme to build new genuinely affordable homes on Council owned land. The Council's housing team should be contacted for information on accessing affordable housing. The draft Local Plan includes a raft of new and refreshed policies on design, including for housing. These take forward the London Plan standards of internal and outdoor amenity space and children's play space. In addition, Part 2 of the Local Plan on Green infrastructure sets out proposals to address deficiencies in open space, including provision for new developments to contribute to provision of new publicly accessible open space.	No change.

		Do not allow poorly and cheaply designed blocks, we cannot afford, and wouldn't want to live in. Build quality housing, with green spaces as a compulsory part of the design. Talk to people. Give them answers. Commit to deadlines and concrete goals. Do not speak in code. Give people an opportunity to build compact but liveable 1 bed places in otherwise 'wasted spaces'. **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** There are a lot of councils doing a lot better, it can't be impossible for us… surely!			
	Housing	**1. Are there other issues around housing that the Local Plan should address?** Challenging Government targets where appropriate 2. **Do you have any comments on the proposed approaches to housing? Select the topic(s**): Genuinely affordable housing Accommodation for older people Optimising the use of small sites **3. Please provide your comments on the topic(s) selected above.** This is inappropriate and will break up neighbourhoods with householders selling off gardens cramming potentially flats to maximise profit and degrading the environment. Inevitably involves matures tree removal because the Planning Committee doesnt state they should be retained. Genuinely affordable is a myth. Social housing is affordable for the present population. Affordability depends on mortgage lenders and the amount of deposit as much as the house price .All it will mean is increased choice for the lucky few in a market they can already buy into. Care homes closing, sheltered housing sites being allowed to develop into flats (non specified_ not like for like. Disgraceful… if it was your parents or yourself having to move from sheltered/ retirement homes at the age of 70s and 80s. eg Castlebar/ Mais House. Sydenham Hill **4. Do you think that there are other approaches that should be considered?** look to the ethics of the 70s as far as planning space./ respecting retention of mature trees/ shrubbery in any planning consent. After all if your forefathers hadn't respected these trees in past decisions they wouldn't be here now. Stop Right to BUY Allow ex tenants who have bought their properties to sell back/ exchange their property for a secure rent and children on rent book which would increase council stock Increase by 10 fold at least c tax on empty properties and other punitive measures **5. Do you have any additional comments on the 'Housing' section of the Local Plan?**	2	The Local Plan recognises and seeks to respond to the housing crisis and particularly the issues of housing affordability. The draft Local Plan seeks that new developments make provision for maximum amount of genuinely affordable housing, with a strategic target of 50% of all new homes delivered to be genuinely affordable, with affordability linked to local income levels. The Council is also undertaking an ambitious home building programme to build new genuinely affordable homes on Council owned land. The Local Plan includes policies which seek to protect garden land, along with requirements for new development to protect open space, trees and deliver urban greening measures on site, including tree planting. Right to buy, Council purchase of properties and Council tax are outside the scope of the Local Plan.	No change.

		Key workers deserve social housing. Stop Right to BUY in Lewisham. Fill the empty homes in Lewisham. Quicker turnaround on social housing/ build / buy back from residents in ex council properties in exchange			
	Housing	**1. Are there other issues around housing that the Local Plan should address?** So much of the new housing is completely genuinely unaffordable for most lewisham Residents. In your plan you propose 50% of new housing should be genuinely affordable, in that case why have so many of the Hugh rise block being built in central lewisham way out of of the price range of most people, part from property investors, investors from abroad and people who work in the city. I do not trust that you when you say that future builds will be affordable. **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** None selected **3. Please provide your comments on the topic(s) selected above.** Most of the new high rise housing in central lewisham is completely unaffordable for most lewisham residents. In your plan you propose 50% of new housing should be genuinely affordable, in that case why have so many of the High rise block being built in the past 5 years in central lewisham been way out of of the price range of most people, apart from property investors, investors from abroad and people who work in the city. I do not trust you when you say that future builds will genuinely affordable. I want you to exactly define what prices and rents that would mean, and the target lewisham resident population who would be housed in these new homes, and then after the buildings have been sold or rented , give details of the prices they were sold at and what rents **4. Do you think that there are other approaches that should be considered?** Provision of well built, sustainable, excellently insulated, low cost housing available to those of low income and lewisham residents to rent or buy. Not poorly built, for maximum profit for house builders who are making multi millions, and land banking. I think the housing association structure is good not for profit structure that could be used support social housing, thought that sector is not without its own corruption, hopefully it is less mercenary than the private building sector. **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** When I a standing by lewisham high street at ladywell, Lewisham does not feel green. It simply feels like a traffic intersection, you need to preserve all green spaces not just parks	3	The Local Plan recognises and seeks to respond to the housing crisis and particularly the issues of housing affordability. The draft Local Plan seeks that new developments make provision for maximum amount of genuinely affordable housing, with a strategic target of 50% of all new homes delivered to be genuinely affordable, with affordability linked to local income levels. In line with national and regional planning policy, the amount of affordable housing delivered on a case-by-case basis will be subject to financial viability. The Council is also undertaking an ambitious home building programme to build new genuinely affordable homes on Council owned land. It will also work proactively with registered social housing providers. The Council exerts no planning control over the sale or rent of private or market properties, and the backgrounds of those who purchase new properties. The Local Plan contains a chapter dedicated to green infrastructure, which includes provisions for protection of open space, urban greening and tree protection/planting.	No change.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** The effect on the existing community long term **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Housing Design **3. Please provide your comments on the topic(s) selected above.** The plans for high density high rise blocks is worrying. Not only are they never of "high-quality design"one of your commitments, but long term they cause social damage as seen in all but a very few high rise developments across the UK since the 60's. The experienced learnt from these developments should be listened to.	5	The London Plan acknowledges that tall buildings will make a contribution to meeting the Capital's housing needs. It directs Boroughs to identify locations suitable for tall buildings and set parameters around height and design, which is reflected in the Local Plan. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.

		4. Do you think that there are other approaches that should be considered? Yes I do. Low rise housing, family homes, safe green spaces for children to play, community centres on large developments, all the things that have proved over time to work. **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A		been undertaken, which has informed the Regulation 19 document. The Local Plan makes clear that higher density development does not necessarily imply tall buildings. The Local Plan includes a raft of new and updated policies on design, including housing design. These take forward the London Plan standards, including for indoor and outdoor amenity space and children's play space. The Local Plan is supported by an Integrated Impact Assessment. This includes an appraisal of the plan policies on different social, environmental and economic objectives. It also incorporates consideration for Equalities Impact Assessment. The IIA has informed the plan's preparation.	
	Housing	**1. Are there other issues around housing that the Local Plan should address?** Emphasis on developing housing that is in harmony with the existing low-rise residential houses **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Housing Design **3. Please provide your comments on the topic(s) selected above.** There is a lack of emphasis on the impact that new development will have on the existing environment, culture and infrastructure within Lewisham. Many residents moved here seeking for "village" environment and new development activities should carefully consider whether the new buildings are in harmony with the existing surrounding. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A	3	The Local Plan sets out that development must be delivered through the design-led approach. Proposals must demonstrate how they will respond positively to local and historic character. The Local Plan must address identified needs for new housing, workspace, community facilities and other uses – to meet these needs it will be necessary to intensify land uses in some areas. The plan sets out the approach to ensure growth is carefully managed. With reference to development density, the plan states that the optimal capacity of a site must be considered having regard to the type and nature of uses, however it is recognised that this policy could be strengthened with reference to the delivery of the spatial strategy.	Local Plan amended to make clear that the optimal capacity of a site is the most appropriate form of development that responds positively to the site's context and supports the delivery of the spatial strategy for the Borough.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A	1	The Council has prepared a Strategic Housing Market Assessment that considers Lewisham's housing list,	Local Plan amended to include a target housing size mix for affordable housing.

		2. Do you have any comments on the proposed approaches to housing? Select the topic(s): Genuinely affordable housing Meeting Lewisham's housing needs Gypsy and traveller accommodation Housing estate renewal and regeneration **3. Please provide your comments on the topic(s) selected above.** The housing start target should take into account the size of the housing list, defining the target in terms of units is a mistake, it should be in terms of bedrooms to allow families to be adequately housed. The council should do its utmost to ensure that housing in Lewisham is genuinely affordable, i.e. take into account income, for both the public sector and private sector. The council must at least meet the legal requirement for the provision of traveller accommodation. **4. Do you think that there are other approaches that should be considered?** The council should licence landlords and see what rent control powers it has and introduce rent controls where it can. The council should look to see if it needs more powers and acquire them under the Localism Act. **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A		local incomes, the affordability of different housing tenures and the need for affordable housing. The SHMA also considered the need for family housing and the results of the study have influenced the policies in the Local Plan. The draft Local Plan seeks that new developments make provision for maximum amount of genuinely affordable housing, with a strategic target of 50% of all new homes delivered to be genuinely affordable, with affordability linked to local income levels. In line with national and regional planning policy, the amount of affordable housing delivered on a case-by-case basis will be subject to financial viability. Lewisham's Gypsy and Traveller Needs Assessment identified the need for 6 pitches up to 2031. The Local Plan provides that this need can accommodated in full, by way of a site allocation policy (Land at Pool Court). Licencing is outside the scope of the Local Plan. However the Council is progressing with licencing schemes for certain types of residential uses, such as Houses in Multiple Occupation (HMOs).	Local Plan updated to include a policy with 10-year pitch target for gypsy and traveller accommodation, based on the Council's latest needs assessment, in line with the London Plan.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** High rise towers do not fit in with local surrounding environment or existing buildings. They are not wanted by residents. Smaller sites and designs that are sympathetic to the local surroundings and environment are required. The high rise towers in Lewisham should never have been allowed and we do not want these elsewhere in the borough. **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Meeting Lewisham's housing needs Optimising the use of small sites Genuinely affordable housing Housing estate renewal and regeneration Housing design Accommodation for older people Supported accommodation Student accommodation Houses in Multiple Occupation	3	The London Plan acknowledges that tall buildings will make a contribution to meeting the Capital's housing needs. It directs Boroughs to identify locations suitable for tall buildings and set parameters around height and design, which is reflected in the Local Plan. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has been undertaken, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.

		Self-build and custom-build Gypsy and traveller accommodation **3. Please provide your comments on the topic(s) selected above.** High rise towers do not fit in with local surrounding environment or existing buildings. They are not wanted by residents. Smaller sites and designs that are sympathetic to the local surroundings and environment are required. The high rise towers in Lewisham should never have been allowed and we do not want these elsewhere in the borough. **4. Do you think that there are other approaches that should be considered?** Same as above **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** Same as above			
	Housing	**1. Are there other issues around housing that the Local Plan should address?** Keeping the nice areas nice and dumping the rest around the c **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Houses in Multiple Occupation **3. Please provide your comments on the topic(s) selected above.** Too many slum landlords dumping everything in the street when tenants turn over. Turn flats back to family homes. No more high rise! As for affordable housing there is no such thing in a central location. Need to build more houses outside of London and make better transport. **4. Do you think that there are other approaches that should be considered?** Yes **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** See above	3	Flytipping is outside the scope of the Local Plan, and is dealt with separately by the Council's waste service and where necessary, enforcement team. However, the Local Plan includes policies to ensure that all new developments make suitable for provision for waste management and recycling facilities. The draft Local Plan seeks that new developments make provision for maximum amount of genuinely affordable housing, with a strategic target of 50% of all new homes delivered to be genuinely affordable, with affordability linked to local income levels. In line with national and regional planning policy, the amount of affordable housing delivered on a case-by-case basis will be subject to financial viability. The Local Plan can only make provision for development within Lewisham. It is acknowledged that there is a significant need for housing elsewhere in London and England, and this is dealt with by the London Plan and local plans of other local authorities.	No change.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** Stop building! **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** None selected	2	The Council is required by national planning policy to prepare a local plan which sets a positive framework for managing growth and development within the borough, including to meet identified needs for housing, business	No change.

		3. Please provide your comments on the topic(s) selected above. When will people realise that when you further condense the housing stock you encourage overcrowding - we are already at saturation point and many parts of the borough have turned into ghettos. The infrastructure cannot cope with more people; the roads are congested and the trains are overcrowded. There's not enough space to add cycle lanes and in any case my 89 year old mum can't ride a bike! We pay our taxes to maintain communities - not to destroy them **4. Do you think that there are other approaches that should be considered?** Demolish tower blocks and outlaw houses of multiple occupation **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A		space, and community facilities along with supporting infrastructure. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Housing design **3. Please provide your comments on the topic(s) selected above.** High rise development seems to be the predominant model of delivering new housing. This is a road to poor quality communities that are not integrated. I would like to see more use of low rise high density housing. I also think the planning system should set higher standards on environmental measures in new build development. Lewisham has an opportunity to be a leader in building green. **4. Do you think that there are other approaches that should be considered?** Environmental measures should come to the fore such as high insulation levels, solar, green roofs etc. Large developments should have cycling and walking prioritised over vehicles. **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** The pandemic has shown that housing should prioritise outside space. Those in high rise blocks without gardens have suffered more than those with garden space	4	Addressing the climate emergency is a key strategic objective of the Local Plan. There are policies included throughout the plan to address this, including the chapter on sustainable design and infrastructure that seeks to minimise greenhouse gas emissions and promote sustainable design. The draft Local Plan includes policies on housing design. It specifies that new housing development must meet, and where possible exceed, the standards for indoor and outdoor amenity space in the London Plan. Furthermore the Local Plan set out policies covering the protection and enhancement open spaces, with a chapter dedicated to green infrastructure.	No change.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** The ownership of the scheme is not discussed. People want council housing not housing association or private. We want cheap and publicly owned **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Meeting Lewisham's housing needs **3. Please provide your comments on the topic(s) selected above.** This will not solve the housing crisis because there are too many profiteers involved. Only solution to lower land price is to build cheap public housing (council) **4. Do you think that there are other approaches that should be considered?** Council housing and long tenancies not these newer short terms ones. And we dont need more private flats	2	The draft Local Plan seeks that new developments make provision for maximum amount of genuinely affordable housing, with a strategic target of 50% of all new homes delivered to be genuinely affordable, with affordability linked to local income levels. In line with national and regional planning policy, the amount of affordable housing delivered on a case-by-case basis will be subject to financial viability. The Council is also undertaking an ambitious home building programme	No change.

		5. Do you have any additional comments on the 'Housing' section of the Local Plan? N/A		to build new genuinely affordable homes on Council owned land. Policies on estate regeneration and renewal and seeking provision of affordable housing on private sites are also set out in the Local Plan. The draft Local Plan policy on affordable housing seeks that tenancies are secured as long-term tenancies, with lifetime tenancies where possible. The council does not exert control over the length of tenancies for market housing, or the market value of land.	
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Housing Design **3. Please provide your comments on the topic(s) selected above.** I would like to see a height limit of 5 floors for any proposed new blocks at Bell Green **4. Do you think that there are other approaches that should be considered?** No **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** No	1	The London Plan acknowledges that tall buildings will make a contribution to meeting the Capital's housing needs. It directs Boroughs to identify locations suitable for tall buildings and set parameters around height and design, which is reflected in the Local Plan. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has been undertaken, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Gypsy and traveller accommodation **3. Please provide your comments on the topic(s) selected above.** We do not need gypsy and traveller accommodation anywhere in this area as it causes problems for everyone who is a resident due to noise and unwanted violence **4. Do you think that there are other approaches that should be considered** [redacted] *(Lewisham Planning Officer note: comment removed as it includes discriminatory language and not considered acceptable)* **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** Need more appropriate shops for family's and elderly residents	1	The National Planning Policy Framework and London Plan require the Local Plan to address Lewisham's identified needs for gypsy and traveller accommodation. The Lewisham's Gypsy and Traveller Needs Assessment (2016 update) identified the need for 6 pitches up to 2031. The Local Plan provides that this need can accommodated in full, by way of a site allocation policy (Land at Pool Court). The Local Plan includes a standalone policy on older person's accommodation. Noted. The Council has prepared a Strategic Housing Market Assessment	Local Plan amended to include target dwelling size mix for affordable housing.

				(SHMA) that has considered the need for housing in the borough, including dwelling size mix. The draft Local Plan seeks to ensure that development proposals deliver a mix of housing tenures and types. It also includes policies to protect the stock of existing family homes, with policies that restrict conversions unless family sized (3+ bed) units are retained or re-provided. However it is acknowledged that further details on the need for family sized units could be provided.	
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Meeting Lewisham's housing needs Genuinely affordable housing Housing estate renewal and regeneration **3. Please provide your comments on the topic(s) selected above.** Lewisham's approach to 'genuinely affordable housing', conflating social rents with GLA London affordable rents, is unacceptable. There is huge need for genuine SOCIAL rented housing, and all developments should reflect this. In regeneration, no net loss of social rented homes should be acceptable, and replacement of social rented housing that has already taken place should be undertaken to address the loss that has already taken place. I applaud the active resistance shown by the residents of Achilles Street, to the unnecessary redevelopment of their estate, when refurbishment should have been the preferred option **4. Do you think that there are other approaches that should be considered?** Yes. Explicit encouragement for new developments to include co-operative ownership, or - in the case of social rented housing - development as tenant management organisations from first letting. **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A	1	Disagree. The Local Plan takes forward recommendations from the Strategic Housing Market Assessment. It includes a local definition of genuinely affordable housing, with affordability linked to local income levels. This provides that genuinely affordable housing is social rent or London Affordable rent. The council considers this is acceptable, based on local evidence. The Local Plan contains a policy on housing estate regeneration which seeks to ensure no net loss of affordable housing, with an uplift in genuinely affordable housing to be delivered wherever possible. The local plan includes policies on self-build and custom build housing, which are the models most commonly associated with cooperative ownership.	No change.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** Private rent levels **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Genuinely affordable housing **3. Please provide your comments on the topic(s) selected above.** Private rents need to be monitored as they are often astronomically high and above the amount for a mortgage. Landlords use rents to pay their own mortgage and the tenants are left with no disposable income and therefore cannot save for a deposit enabling them to buy their own home. The local authority has to pay housing benefit to many tenants including	1	Whilst the concerns are noted, the Council exerts no control over the setting of rents on private or market properties, and this is a matter that cannot be dealt with in the Local Plan.	No change.

		those in high paid job. Essentially the council are helping to pay private landlords mortgages for them. **4. Do you think that there are other approaches that should be considered?** Set a fair rent across all private tenancies **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A			
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Self-build and custom-build **3. Please provide your comments on the topic(s) selected above.** keep ensuring opportunities for this to happen **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A	0	The Local Plan has a standalone policy on self-build or custom-build housing. It promotes this type of development and provides in principle support for such development proposals that help to meet identified needs and secure delivery of the spatial strategy. The Council maintains a self-build and custom-build homes register and has a dedicated webpage where people can register their interest. The Council has and will continue to support local communities with self-build projects within resources available to it.	No change.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** Ensuring intensification of residential areas doesn't adversely impact on existing residents **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Optimising the use of small sites **3. Please provide your comments on the topic(s) selected above.** I am very concerned about the proposal to allow developments on small sites in residential areas. Many people move to Lewisham to live in a less urban and polluted environment, yet these proposals seem to point to making Lewisham significantly more urban and, as a result, polluted. Last year a girl died from air pollution in London. The council should be protecting and encouraging small areas of wild greenery in residential areas to support the health and wellbeing of residents and tackle the climate crisis rather than earmarking such sites for development. In addition, there is no mention in the council's proposals of the need for developers of small sites to consider existing residents' homes and the impact any development will have on their light and enjoyment of their home and garden, with a plan to mitigate any negative impacts. This seems to me a crucial oversight. There are many ways developers can design homes and the landscaping around them to retain a feeling of greenery and open space for existing residents, and to avoid residents being overlooked, but they won't if the council doesn't specifically require them. Please address this as a matter of urgency. Housing development in Lewisham should not be done in such a way that it negatively impacts on existing residents' enjoyment of their homes. **4. Do you think that there are other approaches that should be considered?** Yes, housing should be located in areas where there is space and an opportunity to build local infrastructure and communities rather than 'intensifying' suburban areas. This intensification	8	The London Plan introduces a small sites housing target for all London boroughs, and its policy H2 compels boroughs to boost the delivery of housing on small sites, particularly to meet London's housing needs. Taking the direction of the London Plan, the Local Plan includes policies to support the development of small sites. It includes detailed requirements to ensure that such development responds positively to its local context, including local and historic character as well as amenity of occupiers and surrounding properties. The Council has adopted a Small Sites SPD with guidance to support this approach and ensure new development is sensitive to its local context. Addressing the climate emergency is a key strategic objective of the Local Plan. There are policies included	Local Plan amended to make clear that the optimal capacity of a site is the most appropriate form of development that responds positively to the site's context and supports the delivery of the spatial strategy for the Borough.

		is in direct opposition to what is required to reduce climate change and will have negative impact on existing residents' wellbeing. **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A		throughout the plan to address this, including the chapter on sustainable design and infrastructure, with a specific policy on improving air quality.	
	Housing	**1. Are there other issues around housing that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Meeting Lewisham's housing needs **3. Please provide your comments on the topic(s) selected above.** This is very difficult. The proposals are not wrong but that does not make them right. Housing is a "now" issue and seems to be used as a reason for overlooking other aspects of planning. It is like "saving the NHS" in the Covid crises. The unforseen consequence will be the demise of the Care Sector. There are too many short term issues here, it is too fragmented, there needs to be a simplier, clearer stratergy. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A	0	The Local Plan sets out a clear spatial strategy. Whilst housing is an important element of the plan, it is only one element and is balanced by a variety of strategic objectives that will help to deliver Good Growth within the borough. The Local Plan is supported by an Infrastructure Delivery Plan. This sets out the different types of infrastructure required to support the levels of growth planned over the long-term, and includes consideration of health and social care.	No change.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** Amenity Space (both in absolute terms and how it is communally used in blocks with a mixture of private and affordable), Build To Rent, Compulsory Purchase Orders & how you plan to tackle the very difficult issue of vacant houses, lifetime homes standards **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Optimising the use of small sites Meeting Lewisham's housing needs Accommodation for older people 3. **Please provide your comments on the topic(s) selected above**. Broadly the principles are right. Older persons housing - more differentiation within the category of older person housing (extra-care, sheltered) & a greater focus on supporting lifetime flexible homes standards throughout all development to allow more resilient and purposeful stock throughout the borough (added benefits of reducing demand for your adult social care services). Small Sites - Really pro this & Lewisham has done a good job, not least with the work RCKa. In line with the GLAs approach small sites, including those on estate infill, will need to be maximised. Estate Regen - Looks bang on the money! Well linked to Mayors guidance and no-net loss is the right move. Perhaps a linkage to LB Lewisham's decanting strategy (possibly in allocations policy) in addition to link to mayors guidance as this can be the make or break for communities.	0	The draft Local Plan promotes residential accommodation that is designed in a way that allows for easy adaptation to the different needs of users over their lifetime, and takes forward the optional standards for wheelchair accessible and adaptable homes in the London Plan. The draft Local Plan refers to the London Plan for the differentiation between types of specialist accommodation. Vertical extensions are dealt with in the draft Local Plan, both in the High Quality Design section, and Economy and Culture section (air space above commercial units). Part 5 of the Local Plan addresses compulsory purchase. Policy HO1 sets out that the Council will seek to use powers available to it	Local Plan amended to include new policy on Build to Rent.

		4. Do you think that there are other approaches that should be considered? Expanding Build-to-Rent and proactive collaboration with the Housing Association sector could be mentioned. Top-hatting and vertical extension could be a focus. **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** No, looks broadly good.		to bring empty homes and properties back into use.	
	Housing	**1. Are there other issues around housing that the Local Plan should address?** No **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** None selected **3. Please provide your comments on the topic(s) selected above.** Definitely OPPOSING high rise tower blocks in the area **4. Do you think that there are other approaches that should be considered?** No **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** No	4	The London Plan acknowledges that tall buildings will make a contribution to meeting the Capital's housing needs. It directs Boroughs to identify locations suitable for tall buildings and set parameters around height and design, which is reflected in the Local Plan. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has been undertaken, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
	Housing	**1. Are there other issues around housing that the Local Plan should address?** There are too many people and too many cars already **2. Do you have any comments on the proposed approaches to housing? Select the topic(s):** Optimising the use of small sites Converting flats to houses **3. Please provide your comments on the topic(s) selected above.** I do NOT support the continued development of high-rise blocks in the centre of Catford - they are ugly, and fuel over-crowding (as does the conversion of more and more houses to flats). **4. Do you think that there are other approaches that should be considered?** How about renovating some of the derelict, empty buildings e.g. The Grove, 520 Lordship Lane - total eyesore, hug building, empty for years - why?? **5. Do you have any additional comments on the 'Housing' section of the Local Plan?** N/A	2	Noted. The London Plan acknowledges that tall buildings will make a contribution to meeting the Capital's housing needs. It directs Boroughs to identify locations suitable for tall buildings and set parameters around height and design, which is reflected in the Local Plan. Since the consultation on the Regulation 18 Local Plan, additional work on a Tall Buildings study has been undertaken, which has informed the Regulation 19 document. The plan also includes policies which protect against the loss of family sized housing units and recognises that one of the routes to boosting housing supply is to bringing back vacant properties back into use.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below** Local centres		Noted. Part 3 of the Local Plan has been amended to incorporate the role Hither Green, west of the railway.	Local Plan amended to provide further details for Hither Green, including area west of the railway. Local Plan amended to designate Hither Green Lane as a Local Centre.

		3. Please provide your comments on the topic(s) selected above (concerning town centres). Staplehurst Road has had so much of our Council Tax invested in it but nothing has been invested on the other side of the railway in Hither Green. Staplehurst Road should not get any more money, it should be spent in other areas of Hither Green that have not been touched for over 20 years. On Springbank Road the pavements outside the shops are a disgrace. Where has all the Section 106 money been spent from the three housing developments (Court Mews, behind the community garden, and near Maythorne Cottages) as well as the shops you mistakenly allowed to be made into flat on on Springbank? **4. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below** A thriving and inclusive local economy **5. Please provide your comments on the topic(s) selected above (concerning economy and culture).** Invest in areas other than Staplehurst Road. Residents in other areas are just as important. **6. Do you think that there are other approaches that should be considered?** Invest in areas other than Staplehurst Road. Residents in other areas are just as important west of the railway. **7. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan?** Rewrite them for all of the community, not just gentrification east of the railway			
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below** N/A **3. Please provide your comments on the topic(s) selected above (concerning employment land).** N/A **4. Do you have any comments on the proposed approaches to town centres? Select topic(s) and comment below** Local Centres **5. Please provide your comments on the topic(s) selected above (concerning town centres).** Staplehurst Road has had so much of our Council Tax invested in it but nothing has been invested on the other side of the railway in Hither Green. Staplehurst Road should not get any more money, it should be spent in other areas of Hither Green that have not been touched for over 20 years. On Springbank Road the pavements outside the shops are a disgrace. Where has all the Section 106 money been spent from the three housing developments (Court Mews, behind the community garden, and near Maythorne Cottages) as well as the shops you mistakenly allowed to be made into flat on on Springbank?	2	Noted. Part 3 of the Local Plan has been amended to incorporate the role Hither Green, west of the railway.	Local Plan amended to provide further details for Hither Green, including area west of the railway. Local Plan amended to designate Hither Green Lane as a Local Centre.

		6. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below A Thriving and inclusive local economy **7. Please provide your comments on the topic(s) selected above (concerning economy and culture).** Invest in areas other than Staplehurst Road. Residents in other areas are just as important. **8. Do you think that there are other approaches that should be considered?** Invest in areas other than Staplehurst Road. Residents in other areas are just as important west of the railway. **9. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan?** Rewrite them for all of the community, not just gentrification east of the railway			
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** Hither Green West of the tracks is not included at all in your plan. Why is that? Why is Hither Green east of the tracks but not west? **2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below** N/A **3. Please provide your comments on the topic(s) selected above (concerning employment land).** None selected **4. Do you have any comments on the proposed approaches to town centres? Select topic(s) and comment below** N/A **5. Please provide your comments on the topic(s) selected above (concerning town centres).** Town centres at the heart of our communities **6. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below** Invest in the various retail and f&b environments. There are many opportunities on Hither Green Lane and Springbank Road that have not been considered at all. **7. Please provide your comments on the topic(s) selected above (concerning economy and culture).** A thriving and inclusive local economy **8. Do you think that there are other approaches that should be considered?** Hither Green west if the tracks- needs investment. Its far larger than Staplehurst Road with a much more diverse community, why is it and its residents being ignored? **9. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan?**		Noted. Part 3 of the Local Plan has been amended to incorporate the role Hither Green, west of the railway.	Local Plan amended to provide further details for Hither Green, including area west of the railway. Local Plan amended to designate Hither Green Lane as a Local Centre.

		See above			
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below** **None chosen** **3. Please provide your comments on the topic(s) selected above (concerning employment land).** **N/A** **4. Do you have any comments on the proposed approaches to town centres? Select topic(s) and comment below** **Local centres** **5. Please provide your comments on the topic(s) selected above (concerning town centres).** As a resident of Hither Green for 40 years with experience of working in local economic development and specifically in developing town centres , while the overall draft plan has some excellent work, the proposed local centres contain an error that needs correcting. It seems to date back to a misunderstanding of the way the Hither Green has worked for the last 50 years and the future possibilities for the area. Specifically it is clear that Hither Green Lane is the Local Centre for Hither Green in a similar way to Burnt Ash being the local centre for Lee. The very small but perfectly formed Staplehurst road area with its cafes and bars and only 6 actual retail units out of 24 with 12.5% of units closed long term (not 4% as I have read in a council document) is a welcome addition to people in Lee and hither Green but ids not a patch on the Local Centres of Hither Green Lane and Burnt ash, both of which have far more facilities and potentiall . There is no room to expand the offer in Staplehurst road . Hither Green Lane has 57 shops in total with a core area of 28 and two wings of 14 each with 2 other significant units (a supermarket and a gym) on the walking route between the southerly 14 and the core 28. In total Hither Green Lane has 3 small supermarkets , one medium sized supermarket and planning permission for another to open which may have been delayed by the pandemic. In addition it has an environmentally friendly food store which sells unpackaged foodstuffs to local residents who bring their own kitchen containers to the shop. Staplehurst Road on the other hand has 2 small supermarkets , one of which is very small. Even just looking comparing H G Lane's core 28 to Staplehurst Road's 24 sites H G Lane has 4 barbers/ hairdressers vs 2 in Staplehurst, 2 dry cleaners vs 1, 3 Estate agents vs 1 , both have 1 micropub, H G Lane has 9 pure retailers vs 6 and Staplehurst has 10 cafes or restaurants or takeaways vs H G Lanes 7 - but as stated above H G Lane has approx 57 premises in total. If one lives in say Radford Road one thinks of H G Lane as having 44 easily walkable to shops and if one lives in say Woodland street again one thinks of H G Lane as having 44 easily walkable to shops, just a different 44 with the same core of 30 (including the 28, Tesco and the gym). Thus to most people in Hither Green , Hither Green Lane has far more to offer than Staplehurst Road. Turning to the 6 criteria used for selecting a local centre -	82	Noted. The indicators in the Local Centres Topic Paper (2020) have been set to provide a standardised approach for reviewing the centres. In response to this and other comments, the technical paper has been reviewed and updated to acknowledge that Hither Green warrants a Local Centre status. It is recognised however that new permitted Development rights limit the scope for the Council to prevent against the change or use or loss of certain types of commercial premises. Part 3 of the local plan has been amended to incorporate the role Hither Green, west of the railway.	Local Plan amended to provide further details for Hither Green, including area west of the railway. Local Plan amended to designate Hither Green Lane as a Local Centre.

		1. Anchor present - Staplehurst Road possibly has the edge here although the criteria are a little arbitrary as it has the Station Hotel whereas Hither Green Lane has the very popular Good Hope Cafe, it also has the popular Anytime Fitness Gym 2. Publicly accessible Garden or Park - Hither Green Lane has the large popular Mountsfield Park very close nearby which has been used for Peoples Day for over 20 years and is closer to the centre and bigger than the small Manor park. I can see no real connection between Manor House gardens and Staplehurst Road , it is more connected to Lee High Road. Lewisham Park is not far from one end of Hither Green lane but is similarly slightly tenuously connected. 3. Sizable Community, health, educational and social infrastructure within 250m - here Hither Green Lane has huge advantages as it has a range - a doctors surgery and health centre actually in the centre, 2 pharmacies, a primary school within a few metres 2 churches both with church halls regularly used for a variety of activity including the ward assemblies at both and a very popular and well used gym. Hither Green Lane also has a studios complex with many artists and filmmakers etc based inside providing vibrancy and workers to support the shops. 4. Train Station present. While Staplehurst Road benefits from the station on its doorstep in fact one of Hither green Lane's supermarkets is approx 220m from the side entrance to the station on Springbank road - this is used by thousands of people every day and used to be the main entrance to the station when it was built until the 1970s. Thus Hither Green Lane is very close to the station and i strongly suspect more people enter the station from the west side. Also Hither Green Lane shops have 2 bus routes passing through with 8 bus stops whereas Staplehurst Road only has one route with 2 stops. 5. Small supermarket present. As mentioned above Hither Green lane has 4 supermarkets , one, the Co-op, is big enough for people to use trolleys and do a weekly shop, plus another was due to open on the corner of George Lane and there is another food store. Staplehurst road has 2 small supermarkets . 6. Housing Growth Planned. This seems a particularly arbitrary and not very logical measure. Places that have seen a large increase in recent years would seem to be more likely to sustain a centre than places where a small increase in housing might be built in future years. Having said that - the justification for Staplehurst Road is that it is near Maythoirne Cottages which is not likely to be developed in the near term and is anyway small, and is furthermore not far from Hither Green Lane. The second mentioned is the Driving Test centre, described as on Nightingale Grove but actually on Ennersdale Road where it is nearer to Hither Green Lane than the Staplehurst Shops! . I am also aware of a proposed new development just off Hither Green Lane but this is confidential at the moment. Looking at development that has taken place over the last 20 years Hither Green Lane has many hundreds of flats and houses on the old Hospital site, and a number of other developments actually on Hither Green Lane itself such as the old Spotted Cow and many small developments in the backs of shops and 6 new residences being built currently on Hither Green Lane at the corner of George Lane. Staplehurst Road has the Biscuit Factory development and a small number of new family houses off Leahurst Road. These developments provide far more sustainability for Hither Green Lane from when it was built than for Staplehurst Road. This rather long comment has ended up comparing Hither Green Lane to Staplehurst Road. It is not my intention to denigrate Staplehurst Road. As a resident of Hither Green on the other side of the railway line I value its presence and use it , and it is a great space for the Christmas fair. However it seems to be providing more of an evening economy base with a few well placed retailers to benefit from footfall to the station. Springbank Road also has some			

		retailers benefitting in a similar way with a couple of small supermmarkets, a gift shop similar to the 2 in Staplehurst Road and some cafes and takeaways though Springbank Road needs council intervention and support far more than Staplehurst Road which with a Youngs pub and a Sainsburys has some Corporate support. Hither Green Lane on the other hand is thought of by local residents as the local centre and as I think I have demonstrated far more of a local centre. Hither green Lane is surrounded by less affluent housing than in Lee and despite being an undesignated road suffers as a cut through for traffic from the A21 to the south Circular . Lewisham Council has proposed investment in Hither green lane to improve its appearance and environment many times in the last 20 years but for one reason and another this has not come to fruition. Thanks to some local independent entepreneurs and the continued presence of the Co-op supermarket, a newish Tesco and a franchised gym it remains a good local centre but the people of Hither green deserve a better environment and it could be more pleasant and its economy thrive more (cycle facilities are woeful compared to for example Manor Lane). A first step to a better Hither Green Lane should be to declare it for what it is , a local centre , in this new Local Plan. **6. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below** None chosen **7. Please provide your comments on the topic(s) selected above (concerning economy and culture).** N/A **8. Do you think that there are other approaches that should be considered?** N/A **9. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan?** N/A			
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below** Protecting employment sites/ new workspace Location and design of new workspace **3. Please provide your comments on the topic(s) selected above (concerning employment land).** Retaining and providing local employment is really important. Otherwise everyone will be a commuter in or out of the borough. Many local businesses have already relocated out towards the M25. **4. Do you have any comments on the proposed approaches to town centres? Select topic(s) and comment below** None chosen **5. Please provide your comments on the topic(s) selected above (concerning town centres).** N/A	1	The draft Local Plan recognises that Lewisham has a characteristically inward looking and small local economy when compared to many other London boroughs. It therefore sets a framework to help grow the local economy and ensure all residents have access to good quality education, training and job opportunities. The plan seeks to deliver new and modern workspace, with a clear strategy to achieve net gains in overall employment floorspace provision. The local plan also introduces new approaches to support the long-term vitality and viability of town centres.	No change.

		6. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below None chosen **7. Please provide your comments on the topic(s) selected above (concerning economy and culture).** N/A **8. Do you think that there are other approaches that should be considered?** N/A **9. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan?** N/A			
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below** Protecting employment sites/new workspace Strategic Industrial Locations **3. Please provide your comments on the topic(s) selected above (concerning employment land).** The plan is missing inclusion of the opportunity for the hugely important need for 'green jobs' and 'green apprenticeships'. There needs to be a target for green industry opportunities. This should be a borough-wide ambition. **4. Do you have any comments on the proposed approaches to town centres? Select topic(s) and comment below** Town centres at the heart of our communities Town centre network and hierarchy Optimising use of land and floorspace Concentration of uses Local centres Major and district centres **5. Please provide your comments on the topic(s) selected above (concerning town centres).** The plan is missing inclusion of the opportunity for the hugely important need for 'green jobs' and 'green apprenticeships'. There needs to be a target for green industry opportunities. This should be a borough-wide ambition. **6. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below** Workplace training and job opportunities	1	Noted. The Local Plan seeks ensure appropriate provision for education and training, and requires new major development to provide local training and apprenticeship opportunities. The local plan is supported by an Infrastructure Delivery Plan, which sets out infrastructure required to support growth planned for, including education. It is acknowledged that the plan should provide more emphasis on green industries as a strategic priority, and will be amended accordingly. However setting a target for green industry opportunities is presents challenges, as the Council has limited control over the types of businesses that take up space within employment locations, provided the activities are in accordance with the Use Classes set out in the Local Plan.	Local Plan strategic objectives and Policy EC1 amended to provide support for green industries to enable transition to low carbon, circular economy.

		7. Please provide your comments on the topic(s) selected above (concerning economy and culture). The plan is missing inclusion of the opportunity for the hugely important need for 'green jobs' and 'green apprenticeships'. There needs to be a target for green industry opportunities. This should be a borough-wide ambition. **8. Do you think that there are other approaches that should be considered?** **N/A** **9. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan?** The Economy and Culture needs to be focussed on the Green Economy and (local) Culture needed to meet the challenge of the Climate Emergency.			
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below** Town centres at the heart of our communities Town centre network and hierarchy Optimising use of land and floorspace Concentration of uses Local centres Major and district centres Shopping parades and corner shops Location of new town centre development **3. Please provide your comments on the topic(s) selected above (concerning employment land).** Policies EC14 and EC15 are too inflexible i.e.one size fits" for all designated centres. In relation to Lewisham town centre, the primary shopping area (PSA) has been drawn to widely, and does not reflect the likely post Covid World/reducing demand for brick and mortar retailing. The following areas should be excluded from the PSA: Lewis Grove (east and west side); Lewisham High Street (east side) from Santander to Barclays Bank; Lewisham High Street - west side north of Boots and south of Primark; and Lewisham High Street east side south of St Saviours Church. There is no need or reason to retain 50% retail uses in these areas, even if it was enforceable with the new UCO. Retail use should be retained in a tighter core focused within and around Lewisham Shopping Centre and market where all retail uses should be retained (not just 50%), given the increased flexibility elsewhere. Food/beverage, leisure and entertainment hubs should be actively promoted to address the existing deficiency in the town centre, particularly areas for outdoor dining. Two hubs should be encouraged i.e. at the south end of Lewisham High Street (south of Primark and St Saviours Church), including the redevelopment of Lewisham Model Market and numbers 192 to 212 Lewisham High Street). The units between Santander and Barclays east side of the High Street are suitable for food/beverage uses and outdoor dinning. This balanced mix of uses will make the town centre more attractive to visit during the day-time and evenings and secure its long term vitality and viability. The current approach proposed in the plan is effectively status quo, which is unsound in a rapidly changing social and economic environment for all town centres. The site	0	Noted. The Local Plan has been amended to remove the threshold approach to retaining A1 and reflect changes to the Use Class Order, including the new Class E. However, it is still considered appropriate to set a threshold target for Lewisham major centre as it is the principal centre in the borough. Flexibility is provided within the policy to ensure that requirements are not overly prescriptive. The extent of the Primary Shopping Areas are considered appropriated. These were reviewed in line with the Schedule of Changes to the Policies Map.	Local Plan amended to remove the threshold approach to retaining A1 and reflect changes to the Use Class Order, including the new Class E.

		specific allocations in Lewisham town centre should also be changed to reflect the approach outlined above (see further comments submitted).. . **4. Do you have any comments on the proposed approaches to town centres? Select topic(s) and comment below** None chosen **5. Please provide your comments on the topic(s) selected above (concerning town centres).** N/A **6. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below** None chosen **7. Please provide your comments on the topic(s) selected above (concerning economy and culture).** N/A **8. Do you think that there are other approaches that should be considered?** N/A **9. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan?** N/A			
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above (concerning employment land).** N/A **4. Do you have any comments on the proposed approaches to town centres? Select topic(s) and comment below** None chosen **5. Please provide your comments on the topic(s) selected above (concerning town centres).** Policies EC14 to EC18 are out of date and do not reflect the longer term implications of Covid-19 and recent changes to the NPPF and Use Classes Order. Prioritising retail (Class A1 - which no longer exists as a use class) is no longer appropriate or achievable e.g. retaining 50% in the primary shopping area is not appropriate or enforceable. The retail capacity study projections are out of date and need to be updated to reflect the post Covid World. The need for new comparison retail floorspace is likely to be negative. This study does not adequately assess the potential for non-retail uses. Policy must allow town centres to diversify in particular the evening economy in Lewisham town centre needs to be improved. Restricting takeaways	0	Noted. The local plan has been amended to remove the threshold approach to retaining A1 and reflect changes to the Use Class Order, including the new Class E. However, it is still considered appropriate to set a threshold target for Lewisham major centre as it is the principal centre in the borough. Flexibility is provided within the policy to ensure that requirements are not overly prescriptive. Following regulation 18 consultation, a Retail Impact Assessment and Town Centre Trends has been undertaken which updates the comparison floorspace requirement of the Lewisham Retail Capacity Study Update 2019 in line with changing consumer habits such as increased online shopping. The London Plan (2021) - which the local plan has to be in conformity with	Amend local plan to remove threshold approach to retaining A1 and reflect changes to the Use Class Order, including the new Class E. Amend local plan with updated floorspace requirements set out in Town Centre Trends Study (2021). Amend local plan policy on concentration of uses to reflect changes to the Use Class Order.

		within 400 metres of all schools is effectively an embargo as it will cover all designated centres and most of the borough. This restriction should only apply to secondary schools not primary as well. **6. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below** N/A **7. Please provide your comments on the topic(s) selected above (concerning economy and culture).** None chosen **8. Do you think that there are other approaches that should be considered?** N/A **9. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan?** N/A		– establishes that development proposals containing hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school.	
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above (concerning employment land).** N/A **4. Do you have any comments on the proposed approaches to town centres? Select topic(s) and comment below** None chosen **5. Please provide your comments on the topic(s) selected above (concerning town centres).** **N/A** **6. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below** Markets **7. Please provide your comments on the topic(s) selected above (concerning economy and culture).** Lewisham high street market is the best asset to the town centre.it provides a great shop local economy. Providing for the community across different cultures. **8. Do you think that there are other approaches that should be considered?** Providing more help for the market traders.	1	The Local Plan takes a positive approach to markets. The Plan seeks to enhance and protect existing markets and encourage new markets where they complement and support Lewisham's town centre hierarchy. The site allocation policies provide protection for Lewisham market.	No change.

		9. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan? No			
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above (concerning employment land).** N/A **4. Do you have any comments on the proposed approaches to town centres? Select topic(s) and comment below** Town centre network and hierarchy Location of new town centre development **5. Please provide your comments on the topic(s) selected above (concerning town centres).** Policy EC11 This policy does not accord with national guidance in the NPPF (2019). Criterion D. of the policy states that new out-of-centre uses will be resisted including retail parks unless provision has been made within the Local Plan. The NPPF is clear that where proposals comply with the sequential and impact tests in accordance with paragraphs 86-87 and 89, there is no basis for restricting in principle retail or other main town centre uses, provided there is compliance with other development plan policies and the NPPF read as a whole. Criterion D. should therefore be amended to refer to the NPPF and the relevant policy tests relating to out-of-centre retail development, consistent with the approach set out in Policy EC12. Policy EC12 Criterion Da. Of the policy is not consistent with the NPPF. There is no requirement for a need for a main town centre use, to be demonstrated either in quantitative and qualitative terms. In view of what is said elsewhere in the draft plan (e.g. page 287) particularly the Retail Capacity Study Update (2019), criterion Da. would preclude development which otherwise complies with the sequential and impact tests. **6. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below** None chosen **7. Please provide your comments on the topic(s) selected above (concerning economy and culture).** N/A	0	Noted. The Local Plan has been amended to ensure policies regarding retail proposals outside town centres are in line with the NPPF (2021).	Local Plan amended to refer to and align with national planning policies around the location of out-of-centre uses, in accordance with the sequential test.

		8. Do you think that there are other approaches that should be considered? N/A **9. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan?** N/A			
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above (concerning employment land).** N/A **4. Do you have any comments on the proposed approaches to town centres? Select topic(s) and comment below** Shopping parades and corner shops Concentration of uses **5. Please provide your comments on the topic(s) selected above (concerning town centres).** Lewisham provides poor retail experiences for its residents. There is a high concentration of takeaway shops which contribute to poor diet and health issues. Most retail areas in Lewisham are not destinations you want to spend time in. Lee Shopping precinct is an appalling blot at a gateway location and centres in Catford and Lewisham itself are tired and in need of investment. I would like to see buses touted behind Lewisham shopping centre to make the Main Street more pedestrian friendly **6. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below** None chosen **7. Please provide your comments on the topic(s) selected above (concerning economy and culture).** N/A **8. Do you think that there are other approaches that should be considered?** N/A **9. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan?** N/A	1	Noted. The Local Plan includes policies which seek to prevent the harmful overconcentration of hot food takeaways. The Local Plan sets a positive framework in place to support the long term vitality and viability of town and local centres. It includes policies and site allocations to enable the revitalisation and regeneration of selected centres. Further area-specific policies are set out in Part 3 of the Local Plan.	No change.
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** Supporting cultural organisations rather than just buildings and spaces	2	Noted. The Local Plan deals with the development and use of land. Financial support and grant funding for artists, theatre makers, musicians	Local Plan amended to require that development proposals must address cultural venues through the design-led approach.

		2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below None chosen **3. Please provide your comments on the topic(s) selected above (concerning employment land).** N/A **4. Do you have any comments on the proposed approaches to town centres? Select topic(s) and comment below** None chosen **5. Please provide your comments on the topic(s) selected above (concerning town centres).** N/A **6. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below** None chosen **7. Please provide your comments on the topic(s) selected above (concerning economy and culture).** N/A **8. Do you think that there are other approaches that should be considered?** Is there a way to financially support the artists, theatre makers, musicians and cultural organisations in Lewisham rather than focus on where they can work and make things. **9. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan?** N/A		and cultural organisations is outside the scope of the local plan.	
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above (concerning employment land).** N/A **4. Do you have any comments on the proposed approaches to town centres? Select topic(s) and comment below** Local centres Town centre network and hierarchy Town centres at the heart of our communities **5. Please provide your comments on the topic(s) selected above (concerning town centres).**	3	The local plan acknowledges the challenges facing town centres and high streets, such as changing consumer behaviours and the rise of online shopping. The Plan seeks to ensure that town centres can adapt and evolve to respond to these challenges and direct future growth and investment within them. Furthermore, the Plan encourages new markets where they complement Lewisham's town centre network and hierarchy. Following the Regulation 18 consultation, the Council has undertaken work on additional evidence for town centres, taking into account the impact of Covid-19. This	No change.

		One of the things Covid 19 has brought to our attention is the nature of shopping and the place of the high street. It is clear that town centres will take on a very different aspect in the coming years. Rather than wait for decline and decay, it is important to be proactive in restructuring the high street. For a rejuvenation and revitalising of this part of our community, we need to recognise that shopping centres will re-emerge much more like markets with less commercial outlets dependent on large landlords, and more pop-up facilities where local entrepreneurs can expand their businesses. The markets will best be organised around more open spaces that provide the flexibility and cultural opportunities that are so restricted in big shopping malls. They should also provide greater access to the sites of manufacture and creation. **6. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below** None chosen **7. Please provide your comments on the topic(s) selected above (concerning economy and culture).** N/A **8. Do you think that there are other approaches that should be considered?** **N**/A **9. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan?** N/A		has informed the Regulation 19 Local Plan.	
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above (concerning employment land).** N/A **4. Do you have any comments on the proposed approaches to town centres? Select topic(s) and comment below** Local centres Shopping parades and corner shop **5. Please provide your comments on the topic(s) selected above (concerning town centres).** The shops west of the tracks in Hither Green have not been considered at all. **6. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below** None chosen	3	Noted. The indicators in the Local Centres Topic Paper (2020) have been set to provide a standardised approach for reviewing the centres. In response to this and other comments, the technical paper has been reviewed and updated to acknowledge that Hither Green warrants a Local Centre status. Part 3 of the local plan has been amended to incorporate the role Hither Green, west of the railway.	Local Plan amended to provide further details for Hither Green, including area west of the railway. Local Plan amended to designate Hither Green Lane as a Local Centre.

		7. Please provide your comments on the topic(s) selected above (concerning economy and culture). Include Hither Green west if the tracks. The forgotten ward. **8. Do you think that there are other approaches that should be considered?** Hither Green west of the tracks. **9. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan?** No			
	Economy and Culture	**1. Are there other issues around economy and culture that the Local Plan should address?** Make things organic, let local people progress economic development and it then becomes sustainable. **2. Do you have any comments on the proposed approaches to employment land? Select topic(s) and comment below** Working from home **3. Please provide your comments on the topic(s) selected above (concerning employment land).** This is not going to go away and will become a larger way of working; better broadbacd internet connectivity is needed. **4. Do you have any comments on the proposed approaches to town centres? Select topic(s) and comment below** Optimising use of land and floorspace **5. Please provide your comments on the topic(s) selected above (concerning town centres).** Repurpose redundant space where possible rather than demolish. And if it is a new development put flexibility of use at the heart of proposals so that we do not waste resources. **6. Do you have any comments on the other proposed approaches to economy and culture? Select topic(s) and comment below** Markets **7. Please provide your comments on the topic(s) selected above (concerning economy and culture).** Markets are great social spaces as well as commercial and this needs to be recognised. **8. Do you think that there are other approaches that should be considered?** N/A **9. Do you have any additional comments on the 'Economy and Culture' section in the Local Plan?** N/A	2	With regard to enabling home working, the Local Plan is supported by an Infrastructure Delivery Plan, which sets out infrastructure required to support growth planned for, including digital and broadband infrastructure. The Local Plan also includes policies to ensure this is secured as new development comes forward. The Local Plan takes a positive approach to markets. The Plan seeks to enhance and protect existing markets and encourage new markets where they complement and support Lewisham's town centre hierarchy. The Local Plan includes policies to ensure that new developments deliver commercial space that is designed to enable flexibility and adaptation for a wide range of uses and users over its lifetime. It also includes policies dealing with meanwhile uses, to take up temporary space.	No change.
Com muni		**1. Are there other issues around community infrastructure that the Local Plan should address?**	0	The Council has prepared an Infrastructure Delivery Plan (IDP)	No change.

ty Infrastructure		Poor playspace maintenance, insufficient playspace, loss of leisure facilities, commitment to community involvement and consultation prior to changes being made **2. Do you have any comments on the proposed approaches to community infrastructure? Select the topic(s) and comment below** Safeguarding and securing infrastructure New and enhanced community infrastructure Play and informal recreation **3. Please provide your comments on the policy topic(s) selected above.** The closure of the Bridge Leisure centre is at odds with the aspirations in the plan. The south end of the borough desperately needs leisure facililities. Children need to learn to swim and families need access to a local pool. Communication has been poor, with residents left to set up a facebook group to share scant information. A firm commitment not to sell the playing fields / pitches would be welcome. The idea that families must pay to travel to other facilities is unrealistic, adding additional cost together with poor transport connections. Wording about consolidation and making better use of land suggests the intention to continue to sell off community assets for housing. There is a contradiction here as dense populations will need nearby community facilities more than ever. Families in compact accommodation need safe and enriching play space. Genuine community consultation should be at the heart of the policy, as it is these people that will play a major role in running the centres. The plan is disappointing in this respect and does not reference research on best practice. Policy points allowing the loss of playspace based on subjective assessment of 'a shortfall of provision in the locality, having regard to existing and projected future need' are very concerning. This does not put children at the heart of planning, at a time when the borough is seeing population growth. **4. Do you think that there are other approaches that should be considered?** Maintenance of play spaces is poor and needs better commitments. The Horniman Play Park is shown in the plan, however it has 3 out of 4 swings missing. There are also broken climbing nets and a sand play area in desperate need of replacement and repair. The borough needs to do much better for children. Other parks are severely neglected and even a small investment and some community involvement would get them looking a lot better (eg Kirkdale Green). Some parks (eg Horniman) are also used by a large number of visitors to the borough, as well as local residents. Has this been included in the usage assessments? An investment programme for existing leisure facilities to keep them up to date and in good repair? **5. Do you have any additional comments on the 'Community Infrastructure' section of the Local Plan?** It looks like this section has been written as an afterthought and it is disappointing. Several existing infrastructure issues have not been documented. It seems that consultation is being avoided or is done grudgingly to go through the motions. If done correctly, it has been shown to deliver better outcomes.		alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure and community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure. Further, Policy CI3 (E) provides mechanism to protect existing community facilities against losses. The policy states that development proposals that result in the net loss of existing play space will be strongly resisted unless specific conditions are met. The Lewisham Open Spaces Assessment (2019) and the review (2021) are robustly prepared. The methodology is aligned with good practice including PPG17 and Sports England methodology. The study carried out an audit of formal play provision in the Borough. This concluded that whilst there is satisfactory provision across the Borough there are deficiencies present in some areas, most notably to the south-east of Catford. To resolve this, the study suggest that all new development should seek to increase opportunities for play, including by enhancing existing provision, particularly in areas where there are deficiencies. This includes consideration for the types of provision required by different age groups. The Local Plan sets requirements to ensure that new development including play space is appropriately managed over the lifetime of the development. Otherwise the maintenance of play spaces is outside the scope of the Local Plan.	

				The Council's Parks and Open Spaces Strategy sets priorities for the managing parks and open spaces. This should be referred for further information.	
Community Infrastructure		**1. Are there other issues around community infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to community infrastructure? Select the topic(s) and comment below** New and enhanced community infrastructure Play and informal recreation **3. Please provide your comments on the policy topic(s) selected above.** Greening and active play spaces for children need to be mandated for all developments that include family homes. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Community Infrastructure' section of the Local Plan?** N/A	1	The draft Local Plan Part 2 Policy CI1 requires development proposals for major and other development to plan positively to meet local area needs for community infrastructure. The Local Plan includes a policy on play and informal recreation. The Local Plan takes forward the London Plan housing standards, including the minimum standards for children's play space.	No change.
Community Infrastructure		**1. Are there other issues around community infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to community infrastructure? Select the topic(s) and comment below** Safeguarding and securing infrastructure New and enhanced community infrastructure Play and informal recreation Nurseries and childcare facilities **3. Please provide your comments on the policy topic(s) selected above.** Good that this gives details on the localisation of services, e.g. child-care and health. The proposals need to be more 'all encompassing', i.e. integrating leisure, business and retail, as well as recreational space - all within planned walking distances of communities (or supported with sustainable transport). The safety and development needs of children must take centre stage of this community based strategy. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Community Infrastructure' section of the Local Plan?** N/A	0	The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure. Further, Policy CI3 provides mechanism to protect existing community facilities against losses. The policy states that development proposals that result in the net loss of existing play space will be strongly resisted unless specific conditions are met. The spatial strategy for the borough sets out the approach to ensure different land-uses are integrated, and development located and designed in a way to support liveable neighbourhoods. It is acknowledged	Spatial strategy amended to make clear this supports the '15-minute' neighbourhood concept.

				that a reference could be made to the 15-minute neighbourhood concept for clarity.	
Community Infrastructure		**1. Are there other issues around community infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to community infrastructure? Select the topic(s) and comment below** N/A **3. Please provide your comments on the policy topic(s) selected above.** N/A **4. Do you think that there are other approaches that should be considered?** While the problem has been exacerbated by the lockdown and closure of hospitality businesses, there are insufficient public toilets especially near Deptford Market. I propose a Parisian style urinal near the south end of the High Street. **5. Do you have any additional comments on the 'Community Infrastructure' section of the Local Plan?** N/A	0	The Part 2 Local Plan design policies on public realm seek to ensure that development proposals consider provision of public toilets. This will enable the Council to seek that facilities are integrated into developments, where appropriate, such as within town centres and other key visitor destinations.	No change.
Community Infrastructure		**1. Are there other issues around community infrastructure that the Local Plan should address?** When building plan for nature too eg swift boxes **2. Do you have any comments on the proposed approaches to community infrastructure? Select the topic(s) and comment below** New and enhanced community infrastructure **3. Please provide your comments on the policy topic(s) selected above.** Build with nature in mind. Trees on streets to absorb pollution.. green living walls and green roofs. Build swift boxes into new buildings to protect Lewisham's diminishing swift population. Improve park areas with community gardens so that people can grow their own veg. **4. Do you think that there are other approaches that should be considered?** Ensuring there is enough affordable housing and that the percentage of low rent homes is increased in private developments **5. Do you have any additional comments on the 'Community Infrastructure' section of the Local Plan?** N/A	4	Noted. The council local plan supports sustainable environment including nature and biodiversity conservation. However it is recognised that further details could be provided to align with provisions in the Environment Act 2021. The draft Local Plan seeks that new developments make provision for maximum amount of genuinely affordable housing, with a strategic target of 50% of all new homes delivered to be genuinely affordable, with affordability linked to local income levels. In line with national and regional planning policy, the amount of affordable housing delivered on a case-by-case basis will be subject to financial viability.	Local Plan amended to include new policy on Biodiversity Net Gain.
Community Infrastructure		**1. Are there other issues around community infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to community infrastructure? Select the topic(s) and comment below** Play and informal recreation	1	The draft Local Plan Part 2 Policy CI1 requires development proposals for major and other development to plan positively to meet local area needs for community infrastructure. The Local Plan includes a policy on play and informal recreation, and seeks to	No change

		3. Please provide your comments on the policy topic(s) selected above. We need more spaces for children to play - whether they be parks/parklets or dedicated playgrounds or both, there should be more public free provision for childhood recreation. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Community Infrastructure' section of the Local Plan?** N/A		address areas of deficiency in play space. The Local Plan takes forward the London Plan housing standards, including the minimum standards for children's play space.	
Community Infrastructure		**1. Are there other issues around community infrastructure that the Local Plan should address?** Revival of our high street as the centre for the community will need to be considered. A revived high street can be a catalyst to bring community together support local businesses and employment. **2. Do you have any comments on the proposed approaches to community infrastructure? Select the topic(s) and comment below** Other: High Street Revival **3. Please provide your comments on the policy topic(s) selected above.** Please create a policy to address this issue **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Community Infrastructure' section of the Local Plan?** N/A	1	The Local Plan sets a positive framework in place to support the long term vitality and viability of town and local centres. It includes policies and site allocations to enable the revitalisation and regeneration of selected centres. Further area-specific policies are set out in Part 3 of the Local Plan.	Local Plan amended to better reflect that community uses are appropriate uses within town centres.
Community Infrastructure		**1. Are there other issues around community infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to community infrastructure? Select the topic(s) and comment below** New and enhanced community infrastructure **3. Please provide your comments on the policy topic(s) selected above.** I mentioned it before on another area in this (very overwhelming and confusing) consultation: Rules should be much stricter to make sure the ground floor of new buildings is actually utilised for communal infrastructure. For example for cycle storage, communal spaces (benches, communal resident-run libraries, play areas) and things like click-and-collect lockers for all the online shopping that everyone will be doing. Not just retail, which always takes ages to arrive, or never does, leaving the ground floor unoccupied and drab. These areas could be so useful and add value immediately, even if the building itself is still being finished or fitted out. Instead it's neglected and just takes up valuable space. **4. Do you think that there are other approaches that should be considered?** Where developers have secured land but have not yet started building or the site has been mothballed for some reason, this should be returned to the council and the public for use, even if it's just a few months. Just put a few benches and plants there, maybe some trees in	2	Noted. The Local Plan design policies include requirements and guidelines around community amenity space in buildings, including for cycle parking and storage. The Part 2 Transport section includes policies dealing with delivery, servicing and construction. These address the need for developments to design in space appropriate to the use, whether for housing or commercial uses. The Local Plan includes polices on meanwhile uses, which provide flexibility for different types of temporary uses within sites where buildings are vacant, awaiting occupation, or where redevelopment is proposed.	No change.

		containers so they can be moved to a different site later on. Turn it into a temporary park or maybe even allotments or shared veg patches. Anything (!) other than a hoarded mothballed building site, so residents can get some use out of it for some time (often years). **5. Do you have any additional comments on the 'Community Infrastructure' section of the Local Plan?** N/A			
Community Infrastructure		**1. Are there other issues around community infrastructure that the Local Plan should address?** The Fifteen Minute Neighbourhood is a good ideal to aim for **2. Do you have any comments on the proposed approaches to community infrastructure? Select the topic(s) and comment below** New and enhanced community infrastructure **3. Please provide your comments on the policy topic(s) selected above.** A) Community gardens and/or allotments are popular and reduce food miles. B) the stallholders at Deptford Market tell me that the fees are crippling; to encourage a circular economy we need more stalls not stalls going bust. **4. Do you think that there are other approaches that should be considered?** Along the Thames footpath, there are long stretches where there are no cafes or Pubs. This seems like a missed opportunity since where they do exist they are generally well patronized. **5. Do you have any additional comments on the 'Community Infrastructure' section of the Local Plan?** **N/A**	4	The spatial strategy for the borough sets out the approach to ensure different land-uses are integrated, and development located and designed in a way to support liveable neighbourhoods. It is acknowledged that a reference could be made to the 15-minute neighbourhood concept for clarity. Further, the local plan supports allotments and community gardens provision where is needed in our local communities. Part 2 Policy GR5 requires major development proposals for residential and community uses to incorporate provision for food growing. The Local Plan takes a positive approach to markets. The Plan seeks to enhance and protect existing markets and encourage new markets where they complement and support Lewisham's town centre hierarchy. The site allocations policies for Convoys Wharf make provision for improvements to the riverside area, including the Thames Path. They will enable appropriate commercial uses at the ground floor of buildings, to support the revitalisation of the riverside area.	Spatial strategy amended to make clear this supports the '15-minute' neighbourhood concept.
Community Infrastructure		**1. Are there other issues around community infrastructure that the Local Plan should address?** There is little or no mention of the role the commercial sector can/should play in the delivery of facilities **2. Do you have any comments on the proposed approaches to community infrastructure? Select the topic(s) and comment below** Play and informal recreation **3. Please provide your comments on the policy topic(s) selected above.**	0	Part2 Policy CI1 covers development proposals for major and other developments which includes commercial development. The draft Local Plan Part 2 Policy CI1 requires development proposals for major and other development to plan positively to meet local area needs for community infrastructure.	No change.

		The lack of childrens play space on equipment in some localities is very noticeable and would not cost much to address. **4. Do you think that there are other approaches that should be considered?** The role of the commercial (and to an extent the voluntary sector) has not beed given sufficient consideration **5. Do you have any additional comments on the 'Community Infrastructure' section of the Local Plan?** N/A		The Local Plan includes a policy on play and informal recreation, and seeks to address areas of deficiency in play space. The Council's Parks and Open Spaces Strategy also sets priorities for investment in parks and open spaces. Part 5 of the Local Plan sets out arrangements for the delivery of the plan. This provides that a wide range of stakeholders will support its delivery.	
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** Protecting mature trees **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** Urban greening and trees **3. Please provide your comments on the topic(s) selected above.** The mature trees need more protection. I've noticed several removed after being heavily pollarded. This should be a last resort. If subsidence is the issue insurance companies should be exploring other options such as underpinning. Immediate locals need to be involved & informed why trees are removed. This will encourage engagement. **4. Do you think that there are other approaches that should be considered?** Downham ward feels very neglected. It's main shopping st Old Bromley Rd is the main traffic route between Lewisham & Bromley. It's large pavements could accommodate large trees which would absorb pollution not to mention give this street a much needed lift. **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** Locals need to be involved in decisions on their street. This will encourage interest.	0	The Lewisham local plan provides policy to protect important trees in the Borough. Part 2 Policy GR4 requires development proposals to retain existing trees and associated habitat and to maximise the opportunities for additional tree planting and green infrastructure within the urban settings. The Council's adopted Statement of Community Involvement sets out how the public will be involved in planning decisions. The Council has also established governance arrangements for Community Infrastructure Levy, where communities can set priorities for the spending of infrastructure funding locally.	No change.
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** I may have missed it but there are small things the Council can do when building or agreeing planning proposals which will make a big difference- like making swift boxes and hedgehog highways mandatory on buildings. Other things could be to plant wildflowers on grass verges and ensure that there are willd areas left in parks and common ground. Trees are very important and there should be more publicity given to the need to maintain and plant more trees.	0	Part 2 Policy GR4 requires development proposals to retain existing trees and associated habitat and to maximise the opportunities for additional tree planting and green infrastructure within the urban settings. Noted. The Local plan includes policies on nature conservation and	Local Plan amended with addition policy on Biodiversity Net Gain.

		2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below Biodiversity and access to nature Urban greening and trees Open space and Lewisham's green grid **3. Please provide your comments on the topic(s) selected above.** Lewisham is very green - I like the Ravensbourne river walk but the Council must make sure - even with economic constraints that areas like this are kept free of rubbish and the river is kept pollution free and areas that become congested with rubbish and littered are regularly cleaned. Beckenham Place park is a great example of what can be done when the Council invests and implements green plans - more wildflower areas could be planted and nest and bat boxes put up for birds and bats. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** N/A		biodiversity. However it is recognised that further details could be provided to align with provisions in the Environment Act 2021. The Local Plan includes policies for waste management. However, sanitation and rubbish maintenance is outside the scope of this plan.	
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** Food security and horticulture - food growing spaces can provide fresh produce for all, reduce food miles and air polution through reduced transportation and can also bring communities together. **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** Food growing **3. Please provide your comments on the topic(s) selected above.** There isn't much mention of extending food growing within the borough despite the huge problem of food insecurity which is about to get worse. Good quality fresh food isn't really available to all and Lewisham should be doing more in this area. The borough could promote some of the excellent practice already happening in the area - social supermarkets, the allotment based Grow to Give schemes as well as thinking about sites purely for urban horticulture - which could provide jobs, training and incomes for local youth and others. **4. Do you think that there are other approaches that should be considered?** Yes - there should be a food growing space in all areas - and parks. A place where those without the means to buy fresh organic foods can help and pick their own. There are great examples of forest gardens, orchards and urban farms that should be promoted more widely (as a member of the recently formed Grow Lewisham this is what we are hoping to provide cross borough) Alternative ways of sequestering carbon and enhancing / cleaning soils, reducing pests with natural methods instead of insecticides and herbicide could be researched. It would make a huge difference to communities and less well off members of the community who tend not to use the 'pretty' parks so much.	2	The Lewisham Local Plan Part 2 Policy GR5 encourages spaces for community gardening and food growing. Further, it ensures that allotments and community gardens are protected in order to support sustainable food growing and promote the opportunities for leisure, social interaction and education.	No change.

		5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan? ***We've removed personal information such as name, phone, email to protect user identity***			
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** I am concerned that the Sites of Interest for Nature Conservation are not offered strong enough protection. Policies on Grove Park Ward should pay closer attention the Neighbourhood Plan. Emphasis should be placed on the delivery of the district park and the renewal of Grove Park crossroads and environment. Metropolitan Open Land needs greater protection for its biodiversity and geodiversity. The community infrastructure levy should be used to pay for the new district park. Fig 3.3 purportedly shows green infrastructure, but only seems to include the formal parks. If it is just the parks, then it should be relabelled, otherwise it should include ALL green infrastructure, including Metropolitan Open Land, SINCs, nature reserves, green corridors, etc. Some green space maps miss a significant part of the MOL land in Grove Park. **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** Green infrastructure Open space and Lewisham's green grid Biodiversity and access to nature Urban greening and trees Food growing Geodiversity **3. Please provide your comments on the topic(s) selected above.** There should be far greater protection to prevent any development plans along the Green corridor from the South Circular to St Augustine's Church at Grove Park. Priority should be changed from the provision of housing to the preservation of wildlife and Green sites. Dark sky site at Grove Park Community Group must be given top priority as this is the only Dark Sky Site in South London. Greater protection must be given to the wild variety of wildlife along the "Green corridor" running at the side of the Railway. Protection must be given to all of these sites against developers in particular speculators such as the one currently owning the wildlife space to the rear of Stratfield house! **4. Do you think that there are other approaches that should be considered?** Total protection for Metropolitan Open Land against any form of Development Identify and build in protection for wildlife Total protection for Dark Sky site Total preservation for all allotment sites Forward planning of Street Trees so that younger ones are planted long before mature ones need to be removed. Ensure speculators are informed there is no possibility of any development of the land. Prioritise Green Space. **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** N/A	1	Part 2 Policy GR should be read alongside other policies in the local plan. There are specific policies in the local plan that relates to the protection of Nature Conservation sites. For example, Part 2 Policy GR3 sets out measures to protect Nature Conservation Sites in order to preserve or enhance priority habits and species, as well as to help ensure the public benefits from easy access to green spaces with wildlife value. Further, Metropolitan Open Land (MOL) SINCs and local green space designation are being progressed through the Council's current open space and MOL review. This will inform policy development concerning open space designations. The local plan has been prepared having regards to the Grove Park Neighbourhood Plan, and through consultation with the Grove Park Neighbourhood Forum.	Local Plan policies on green infrastructure revised to reflect the outcomes of new Open Space and Metropolitan Open Land Reviews.

Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** There should be far greater protection to prevent any development plans along the Green corridor from the South Circular to St Augustine's Church at Grove Park. Priority should be changed from the provision of housing to the preservation of wildlife and Green sites. Dark sky site at Grove Park Community Group must be given top priority as this is the only Dark Sky Site in South London. Greater protection must be given to the wild variety of wildlife along the "Green corridor" running at the side of the Railway. Protection must be given to all of these sites against developers in particular speculators such as the one currently owning the wildlife space to the rear of Stratfield House. This person has already destroyed trees and gone against the opinion of ecologists who have seen the site. As a multimillionaire, petty fines are no protection for the environment against such individuals. Allotments must be preserved and protection given to holders who may go through periods of ill health or are carers. Wildlife. **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Green infrastructure** **Open space and Lewisham's green grid** **Biodiversity and access to nature** **Urban greening and trees** **Food growing** **Geodiversity** **3. Please provide your comments on the topic(s) selected above.** I am concerned that the Sites of Interest for Nature Conservation are not offered strong enough protection. Policies on Grove Park Ward should pay closer attention to the existing Neighbourhood Plan. Emphasis should be placed on the delivery of the district park and the renewal of Grove Park crossroads and environment. Metropolitan Open Land needs greater protection for its biodiversity and geodiversity. The community infrastructure levy should be used to pay for the new district park. Fig 3.3 purportedly shows green infrastructure, but only seems to include the formal parks. If it is just the parks, then it should be relabelled, otherwise it should include ALL green infrastructure, including Metropolitan Open Land, SINCs, nature reserves, green corridors, etc. Some green space maps miss a significant part of the MOL land in Grove Park. Identify and build in protection and management for green spaces & wildlife. Total protection for Dark Sky site. Total preservation for all allotment sites. **4. Do you think that there are other approaches that should be considered?** Consulting more residents on how they use green spaces post-COVID19. Previous conversations are now void as people have altered the way they use the spaces. Ensure speculators are informed there is no possibility of any development of the land.	0	The Council has commissioned an Open Space Review that has informed land-use designations to provide the appropriate protection for green and open spaces, including green corridors. The Dark Sky Site falls within boundary of designated MOL and is therefore afforded the same status and level of protection as Green Belt in line with the London Plan. The Local Plan contains policies to protect allotments however the allocation process of allotments to residents is beyond the scope of the Plan. Part 2 Policy GR should be read alongside other policies in the local plan. There are specific policies in the local plan that relates to the protection of Nature Conservation Sites. Part 2 Policy GR3 sets out measures to protect Nature Conservation Sites in order to preserve or enhance priority habits and species, as well as to help ensure the public benefits from easy access to green spaces with wildlife value. Figure 3.3 refers to only Lewisham's network of green infrastructure. On open space typologies refer to figure 10.2.	Local Plan policies on green infrastructure revised to reflect the outcomes of new Open Space and Metropolitan Open Land Reviews.

		Any building application should be refused by planning department, not as happened with site behind Ringway. Prioritise Green Space for residents who are currently living in the area and work around this. Preserve Family Homes. **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**			
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** There should be far greater protection to prevent any development plans along the Green corridor from the South Circular to St Augustine's Church at Grove Park. Priority should be changed from the provision of housing to the preservation of wildlife and Green sites. Dark sky site at Grove Park Community Group must be given top priority as this is the only Dark Sky Site in South London. Greater protection must be given to the wild variety of wildlife along the "Green corridor" running at the side of the Railway. Protection must be given to all of these sites against developers in particular speculators such as the one currently owning the wildlife space to the rear of Stratfield House. This person has already destroyed trees and gone against the opinion of ecologists who have seen the site. As a multimillionaire, petty fines are no protection for the environment against such individuals. Allotments must be preserved and protection given to holders who may go through periods of ill health or are carers. Wildlife species need to be identified, recognised and given greater protection than they currently have. **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Green infrastructure** **Biodiversity and access to nature** **Urban greening and trees** **Food growing** **3. Please provide your comments on the topic(s) selected above.** I am concerned that the Sites of Interest for Nature Conservation are not offered strong enough protection. Policies on Grove Park Ward should pay closer attention to the existing Neighbourhood Plan. Emphasis should be placed on the delivery of the district park and the renewal of Grove Park crossroads and environment. Metropolitan Open Land needs greater protection for its biodiversity and geodiversity. The community infrastructure levy should be used to pay for the new district park. Fig 3.3 purportedly shows green infrastructure, but only seems to include the formal parks. If it is just the parks, then it should be relabelled, otherwise it should include ALL green infrastructure, including Metropolitan Open Land, SINCs, nature reserves, green corridors, etc. Some green space maps miss a significant part of the MOL land in Grove Park.	0	The Council has commissioned an Open Space Review that has informed land-use designations to provide the appropriate protection for green and open spaces, including green corridors. The Dark Sky Site falls within boundary of designated MOL and is therefore afforded the same status and level of protection as Green Belt in line with the London Plan. The Local Plan contains policies to protect allotments however the allocation process of allotments to residents is beyond the scope of the Plan. Part 2 Policy GR should be read alongside other policies in the local plan. There are specific policies in the local plan that relates to the protection of Nature Conservation sites. For example, Part 2 Policy GR3 sets out measures to protect Nature Conservation Sites in order to preserve or enhance priority habits and species, as well as to help ensure the public benefits from easy access to green spaces with wildlife value. The local plan has been prepared having regards to the Grove Park Neighbourhood Plan, and through consultation with the Grove Park Neighbourhood Forum.	Local Plan policies on green infrastructure revised to reflect the outcomes of new Open Space and Metropolitan Open Land Reviews.

		Identify and build in protection and management for green spaces & wildlife. Total protection for Dark Sky site. Total preservation for all allotment sites. **4. Do you think that there are other approaches that should be considered?** Consulting more residents on how they use green spaces post-COVID19. Previous conversations are now void as people have altered the way they use the spaces. Ensure speculators are informed there is no possibility of any development of the land. Any building application on the SINC sites should be refused by planning department, not as happened with site behind Grove Park Community Group/Stratfield House. Prioritise Green Space for residents who are currently living in the area and work around this. Preserve Family Homes. **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**		Figure 3.3 refers to only Lewisham's network of green infrastructure. On open space typologies refer to figure 10.2.	
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** Feel there should be far greater protection to prevent any development plans along the Green corridor from the South Circular to St Augustine's Church at Grove Park. Priority should be changed from the provision of housing to the preservation of wildlife and Green sites. Dark sky site at Grove Park Community Group must be given top priority as this is the only Dark Sky Site in South London. Greater protection must be given to the wild variety of wildlife along the "Green corridor" running at the side of the Railway. Protection must be given to all of these sites against developers in particular speculators such as the one currently owning the wildlife space to the rear of the Ringway. This person has already removed trees in breach of the protection order. As a multimillionaire petty fines are no protection for th4e environment against such individuals. Allotments must be preserved and protection given to holders who may go through periods of ill health or are carers. Wildlife species need to be identified, recognised and given greater protection than they currently have. **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** Green infrastructure Biodiversity and access to nature Food growing Urban greening and trees Restore lost equestrian and golf provisions **Geodiversity** **Open space and Lewisham's green grid** **3. Please provide your comments on the topic(s) selected above.** Total protection for Metropolitan Open Land against any form of Development Identify and build in protection for wildlife	0	Polices contained in the Lewisham's local plan offers greater protection to green infrastructure network including Green Corridor from South Circular to St. Augustine's Church at Grove Park. The Council has commissioned an Open Space Review that has informed land-use designations to provide the appropriate protection for green and open spaces, including green corridors. The Dark Sky Site falls within boundary of designated MOL and is therefore afforded the same status and level of protection as Green Belt in line with the London Plan. Part 2 Policy GR1 ensures that green infrastructure are protected and enhanced across the Borough including creating new links between green infrastructure assets.	Local Plan policies on green infrastructure revised to reflect the outcomes of new Open Space and Metropolitan Open Land Reviews.

		Total protection for Dark Sky site Total preservation for all allotment sites Forward planning of Street Trees so that younger ones are planted long before mature ones need to be removed. Far greater soil are around base of tree not silly little area that is currently given. Closer links with Wildlife groups e.g R.S.P.B. Bee Groups, Butterfly groups, Hedgehog Groups etc **4. Do you think that there are other approaches that should be considered?** Ensure speculators are informed there is no possibility of any development on green or wildlife land Any building application should be refused by planning department, not as happened with site behind Ringway. Prioritise Green Space over Housing. Preserve Family Homes **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** Made clear that Preservation and Conservation does Not equal Regeneration. More of the Former. The mistakes made at The Green Man site and Beckenham Place park illustrate this. There is now no public Golf course for the younger generation, and the loss of free on site parking has resulted in problems for surrounding residents and organisations, Churches etc.			
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** Lack of commitment to positive action to improve green infrastructure is disappointing **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** Green infrastructure Open space and Lewisham's green grid Urban greening and trees Biodiversity and access to nature **3. Please provide your comments on the topic(s) selected above.** The borough is lacking in green space and there is little enthusiasm for protecting mature trees, leaving residents to spend time and money trying to be heard. Playspace needs to be more highly valued and protected. The planting in parks is often lacking biodiversity and not well cared for. Engaging community groups would engage volunteers in improving spaces for everyone. During lockdown, much better bin provision is required. The increases in park users is now predictable and more bins would reduce the litter problems. The decision on what is quality design seems to be subjective and should be referred to independent experts. Areas of special character are being ignored. **4. Do you think that there are other approaches that should be considered?**	0	Disagree. The Local Plan contains a wide range of measures that support the creation, protection and enhancement of green infrastructure network. Part 2 policies require development proposals to maximise opportunities for enhancing existing green infrastructure and creating new provision. Further, Lewisham's local plan offers adequate protection to highly valued open spaces and green infrastructure network. Part 2 Policy GR2 offers protection to open spaces and green infrastructure network from inappropriate development. The public consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement.	Local Plan amended to require that ecological surveys are carried out by a chartered ecologist.

		Better scrutiny of biodiversity statements and tree planting & maintenance plans is needed, with engagement from independent environmental and community groups. The planning department have admitted they do not have the capacity to critically review all of these documents. Developers are allowed to submit unrealistic statements about tree planting, specifics such as the intended width and breadth of planned trees would quickly highlight where tree planting plans are unrealistic. Details of hours of direct daylight are also vital but missing. If Lewisham want to pursue densification, they must commit to do better on this. Otherwise it makes a mockery of the climate emergency declaration. There should be positive and productive conversations with residents - the outcome being an improved green environment for everyone. This could be achieved at relatively little cost, positive conversations are possible - why doesn't Lewisham advocate for this? There are many people doing good work on the ground who are not consulted, meaning that knowledge is not shared. Protection is needed for nature reserve and pockets of land that provide a nature corridor. Green spaces are so highly valued in lockdown and are really important for people's mental health. **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** The approach to community consultation is restrictive an unimaginative. Expertise in the community is underestimated and ignored.			
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** Stop replacing paving slabs with impermeable surfacing such as tarmac. Southwark use Porous surfaces around trees. Lewisham should adopt the same practice. **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** Biodiversity and access to nature Green infrastructure Urban greening and trees **3. Please provide your comments on the topic(s) selected above.** Plant more shrubs instead of having excessively wide pavements. Southwark have done a great job of this along the new Kent road. Allow more space around street trees to allow residents to under plant. This is done in Lambeth and looks great. Slope pavements towards trees/ flower beds to help alleviate flooding **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** N/A	0	The draft Local Plan includes provisions around tree planting and increasing permeable surfaces cover, including through Sustainable Drainage Systems. Part 2 Policy GR4 requires development proposals to maximise the opportunities for tree planting and green infrastructure. There are Permitted Development Rights for which the Council exercises no planning control (such as paving over of front gardens).	No change.
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below**	2	Part 2 Policy GR should be read alongside other policies in the local plan. There are specific policies in the local plan that relates to the protection of Nature Conservation sites. For example, Part 2 Policy GR3	Local Plan policies on green infrastructure revised to reflect the outcomes of new Open Space and Metropolitan Open Land Reviews.

		Green infrastructure **3. Please provide your comments on the topic(s) selected above.** I am concerned that the Sites of Interest for Nature Conservation are not offered strong enough protection. Policies on Grove Park Ward should pay closer attention the Neighbourhood Plan. Emphasis should be placed on the delivery of the district park and the renewal of Grove Park crossroads and environment. **4. Do you think that there are other approaches that should be considered?** Metropolitan Open Land needs greater protection for its biodiversity and geodiversity. The community infrastructure levy should be used to pay for the new district park. Fig 3.3 purportedly shows green infrastructure, but only seems to include the formal parks. If it is just the parks, then it should be relabelled, otherwise it should include ALL green infrastructure, including Metropolitan Open Land, SINCs, nature reserves, green corridors, etc. Some green space maps miss a significant part of the MOL land in Grove Park. **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** The wild corridor that runs along the train sidings from the south circular to grove park is under serious threat from property developers. The green land where Willow Tree Riding School once stood and the area of wooded land next to Railway Children walk are both under threat from separate developers who have used dubious approaches to gain the land. These green spaces need to be saved for the community and future generations. Once they are lost they are gone forever. The areas in question include various habitats including a incredibly rare wet wood, grass and swamp lands that accommodate all sorts of wildlife including crested newts, bats, butterflies, toads, etc. They also contribute to the air quality.		sets out measures to protect Nature Conservation Sites in order to preserve or enhance priority habitats and species, as well as to help ensure the public benefits from easy access to green spaces with wildlife value. Further, Metropolitan Open Land (MOL) SINCs and local green space designation are being progressed through the Council's current open space and MOL review. This will inform policy development concerning how open space designations are structured and subsequently assigned, particularly for open spaces outside of Metropolitan Open Land (MOL). The local plan has been prepared having regard to the Grove Park Neighbourhood Plan, and through consultation with the Grove Park Neighbourhood Forum.	
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** Green infrastructure **3. Please provide your comments on the topic(s) selected above.** I think this statement in the introduction "Creating new large open spaces will be challenging as land is needed for homes and jobs." should be reformulated as "Creating new homes and jobs will be challenging as land is needed for large open spaces and recreational areas." ... **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** N/A	0	The National Planning Policy Framework sets out that the Council must plan positively to meet identified needs for housing, business space and supporting infrastructure. The Local Plan seeks to balance these growth requirements whilst recognising the need to ensure appropriate provision for open spaces and green infrastructure. The plan sets out the approach to protect open and green spaces, and to create new provision where opportunities arise, and particularly in areas where there are identified deficiencies.	No change.

Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** I am concerned that the Sites of Interest for Nature Conservation are not offered strong enough protection. Policies on Grove Park Ward should pay closer attention the Neighbourhood Plan. Emphasis should be placed on the delivery of the district park and the renewal of Grove Park crossroads and environment. Metropolitan Open Land needs greater protection for its biodiversity and geodiversity. The community infrastructure levy should be used to pay for the new district park. Fig 3.3 purportedly shows green infrastructure, but only seems to include the formal parks. If it is just the parks, then it should be relabelled, otherwise it should include ALL green infrastructure, including Metropolitan Open Land, SINCs, nature reserves, green corridors, etc. Some green space maps miss a significant part of the MOL land in Grove Park. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** N/A	1	Polices contained in the Lewisham's local plan offers greater protection to green infrastructure network. Part 2 Policy GR1 sets out the policy framework to protect and enhance the green infrastructure network across the Borough including enhancing or creating new links between green infrastructure assets. Part 2 Policy GR3 sets out measures to protect Nature Conservation Sites in order to preserve or enhance priority habitats and species, as well as to help ensure the public benefits from easy access to green spaces with wildlife value. Further, Metropolitan Open Land (MOL) designation are being progressed through the Council's current open space and MOL review. This will inform policy development concerning open space designations. Figure 3.3 refers to only Lewisham's network of green infrastructure. On open space typologies refer to figure 10.2.	Local Plan policies on green infrastructure revised to reflect the outcomes of new Open Space and Metropolitan Open Land Reviews.
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** crossroads and environment. Metropolitan Open Land needs greater protection for its biodiversity and geodiversity. The community infrastructure levy should be used to pay for the new district park. Fig 3.3 purportedly shows green infrastructure, but only seems to I am concerned that the Sites of Interest for Nature Conservation are not offered strong enough protection. Policies on Grove Park Ward should pay closer attention the Neighbourhood Plan. Emphasis should be placed on the delivery of the district park and the renewal of Grove Park include the formal parks. If it is just the parks, then it should be relabelled, otherwise it should include	1	Figure 3.3 refers to only Lewisham's network of green infrastructure. On open space typologies refer to figure 10.2. Part 2 Policy GR3 sets out measures to protect Nature Conservation Sites in order to preserve or enhance priority habitats and species, as well as to help ensure the public benefits from easy access to green spaces with wildlife value. Further, Metropolitan Open Land (MOL) designation are being progressed through the Council's current open space and MOL reviews. This will inform policy development	Local Plan policies on green infrastructure revised to reflect the outcomes of new Open Space and Metropolitan Open Land Reviews.

		ALL green infrastructure, including Metropolitan Open Land, SINCs, nature reserves, green corridors, etc. Some green space maps miss a significant part of the MOL land in Grove Park. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** N/A		concerning how open space designations are structured and subsequently assigned, particularly for open spaces outside of Metropolitan Open Land (MOL).	
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** I think that there should be a community run stables at Willow tree. Children used to work there to pay for riding lessons. I believe this experience was invaluable to young people, building community. There is such a lack of community at the moment. **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** I think all that is being done is great but I believe that we should keep a stables. Stop closing everything but build on it. Create community and help for young people. It's so needed these days. **4. Do you think that there are other approaches that should be considered?** Yes, please see above **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** N/A	0	Noted. The site in question is now privately owned and therefore the Council cannot reinstate the community run stables.	No change
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Green infrastructure** **Urban greening and trees** **3. Please provide your comments on the topic(s) selected above.** I am concerned that the Sites of Interest for Nature Conservation are not offered strong enough protection. Policies on Grove Park Ward should pay closer attention the Neighbourhood Plan. Emphasis should be placed on the delivery of the district park and the renewal of Grove Park crossroads and environment. **4. Do you think that there are other approaches that should be considered?** Metropolitan Open Land needs greater protection for its biodiversity and geodiversity. The community infrastructure levy should be used to pay for the new district park.	0	Part 2 Policy GR should be read alongside other policies in the local plan. There are specific policies in the Lewisham local plan that relates to the protection of Nature Conservation sites. Part 2 Policy GR3 sets out measures to protect Nature Conservation Sites in order to preserve or enhance priority habitats and species, as well as to help ensure the public benefits from easy access to green spaces with wildlife value. Figure 3.3 refers to only Lewisham's network of green infrastructure. On open space typologies refer to figure 10.2.	No change

		5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan? Fig 3.3 purportedly shows green infrastructure, but only seems to include the formal parks. If it is just the parks, then it should be relabelled, otherwise it should include ALL green infrastructure, including Metropolitan Open Land, SINCs, nature reserves, green corridors, etc. Some green space maps miss a significant part of the MOL land in Grove Park.			
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Biodiversity and access to nature** **Urban greening and trees** **3. Please provide your comments on the topic(s) selected above.** As a cyclist and GP I am very much in favour of retaining and enhancing green spaces, both for my own mental health and that of the wider community. From our corner of Perry Vale I would like to put in some words for protection of little park in Westbourne Drive. We are so lacking in parks in Perry Vale that they had to draw the ward boundaries in a weird way to make Mayow Park part of Perry Vale... but everyone knows that it isn't. This makes the park in Westbourne drive all the more valuable. I do not want it to be subject to "infill"! **4. Do you think that there are other approaches that should be considered?** **N/A** **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**	1	The Lewisham local plan contained adequate policies on open spaces including parks that protect it from losses to development.	No change
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** The importance of enhancing biodiversity in the built environment has not been fully explored, eg, swifts and other building-dependent birds. **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **None chosen** **3. Please provide your comments on the topic(s) selected above.**	5	Local Plan Part 2 Policy GR3 seeks to deliver net gains in Biodiversity. Specific local biodiversity requirements has been captured in the Council's Biodiversity Action Plan. The Lewisham local plan requires developers to refer to the local Biodiversity Action Plan which sets out vision and opportunities on biodiversity for the Borough including information on detailed priority	No change

		GR3 Biodiversity and access to nature: A requirement should be included for all new developments to incorporate suitably located 'integrated swift bricks'. This biodiversity feature is a universal artificial bird nesting chamber which provides nesting habitat for swifts and other birds. Smaller building projects should similarly incorporate swift bricks, external swift boxes or swift soffit boxes. Existing swift nest sites should be identified, registered and pro-actively protected throughout the year from destruction, and not just protected in principle during the nesting season only. See: Swift Conservation: https://swift-conservation.org/ Action for Swifts: https://actionforswifts.blogspot.com Justification: The UK's swift population declined by 53% between 1995 and 2016; consequently, swifts now qualify for 'endangered' status on the BTO's species list of conservation concern, indicating 'a need for urgent conservation action'. A major factor for the decline is believed by experts to be the loss of swifts' habitual natural nest sites in older buildings, through demolition and renovation works. Modern building practices lack the small spaces required by swifts for nesting. Increasing nesting and roosting habitat is highly effective in supporting bird species, especially building-dependent birds, thereby promoting biodiversity. Integrated swift bricks provide permanent nesting and roosting habitat for a range of bird species. They are maintenance-free, aesthetically inoffensive and provide a thermally stable nesting environment. Existing populations of bird species need to be protected, particularly building-dependent birds. Currently birds' nests are only protected by law during the breeding season. Swifts in particular are highly vulnerable to nest destruction, as they are nest-faithful and do not adapt readily to new nest sites. The benefits of artificially increasing nesting habitat is currently disregarded by DEFRA in their assessment of 'biodiversity net gain', Inclusion of swift bricks in construction work will comply with current policy: National Planning Policy Guidance: https://www.gov.uk/guidance/natural-environment: Paragraph: 023 Reference ID: 8-023-20190721: 'Planning conditions or obligations can be used..... to achieve biodiversity net gain..... The work involved may.....involve creating new habitats, enhancing existing habitats, ...Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments.....' The Government's Building Better Building Beautiful Commission report 'Living With Beauty' (30/01/20) Policy Proposition 33, page 110) recommends: 'Bricks for bees and birds in new build homes'. https://www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission		species and habitats threatened which needed protection.	

		4. Do you think that there are other approaches that should be considered? **N/A** **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**			
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Biodiversity and access to nature** **Urban greening and trees** **Food growing** **Veganism** **3. Please provide your comments on the topic(s) selected above.** Under GR3, teaching residents about the value of nature and animals intrinsic right to exist are net gains for biodiversity. Helping people to appreciate the value they see before them will help realise they can make changes in other areas of their life to help the wider environment. Lewisham Council should add a third provision here to help by “encouraging the education of the wider public about the benefits they gain from preserving the nature that they see. Under GR5, providing as much food growing provision as possible will help residents to understand just how much effort goes into nurturing the food that they buy so easily from the shops or restaurants and takeaways. It will also help develop an interest in growing and eating a wider range of vegetables and fruits, especially so if it was their hard work that got it for them to begin with. As such, Lewisham Council should ensure provision 10.29 and 10.30 are kept central to the design stage and tie this into the vegan cookery lessons under SD1 **4. Do you think that there are other approaches that should be considered?** Veganism is an almost certainty for the future of human existence. The sooner we get there, the less work there will need to be done in the future. It benefits the Council to speed this transition as the savings made in health provision and the costs of supplying foods will drop considerably. It will also help Lewisham reach its GHG Net-Zero targets faster than other boroughs who don't follow suit. **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?**	0	Noted	No change

		That Green Infrastructure even appears in this plan indicates just how important the environment and the services it provides are for human survival. Doing our bit at every level ensure we have done all we could to stave off the worst of what is potentially to come.			
Green Infrastructure		1. **Are there other issues around green infrastructure that the Local Plan should address?** By developing the area i. e. building 30 housing units between the Telecom site in Horniman Drive and Havelock House there will be a detrimental effect on the mature oak trees and other trees in the area. These trees are highly significant as a wildlife corridor and important for absorbing carbon dioxide. 2. **Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **None chosen** 3. **Please provide your comments on the topic(s) selected above.** **N/A** 4. **Do you think that there are other approaches that should be considered?** **N/A** 5. **Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**	1	Noted	No change
Green Infrastructure		1. **Are there other issues around green infrastructure that the Local Plan should address?** Greater discussion of the potential for street trees on heavily polluted roads specially those creating avenues and with broad canopies. The plan seems too reliant on new planning applications rather than proactively seeking to intervene on space and streetscape 2. **Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Developers** 3. **Please provide your comments on the topic(s) selected above.** I'm concerned that you offer too many get out clauses for developers and hope that you will publish by developer name the numbers of applications for exceptions you receive and what your decisions are, as a check and balance against the weakening of the ambitions in this plan. 4. **Do you think that there are other approaches that should be considered?**	9	Officers consider that the Lewisham's local plan has been robustly prepared. The plan is aligned with the NPPF and the London Plan. Further, Part 2 Policy GR4 ensures that development proposals retains existing trees and habitats. It also maximise opportunities for additional tree planting and green infrastructure, particularly trees in urban settings such as streets.	No change

		I would like to see a preference in Lewisham for developments that recycle or re-use old buildings rather than building new: https://www.nytimes.com/2021/03/16/arts/design/pritzker-prize-anne-lacaton-jean-philippe-vassal.html **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** I would like to see discussion about re-prioritising our residential streets away from cars and in favour of pedestrians and cycling using one way streets and strategically removing on pavement parking. Also allowing for planters in between street trees for planting that can help clean the air too.			
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** Wildlife corridors have to be mapped across the borough and protected and strengthened so that urban wildlife can thrive in the built environment. **3. Please provide your comments on the topic(s) selected above.** **N/A** **4. Do you think that there are other approaches that should be considered?** **N/A** **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**	9	Noted	No change
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** The use of current and new buildings to provide habitats for urban dwelling wildlife and building dependent bird species. **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Biodiversity and access to nature** **3. Please provide your comments on the topic(s) selected above.**	5	Noted. The Lewisham local plan Part 2 Policy GR3 supports net gains of biodiversity across the borough. Local biodiversity requirements has been addressed in the Council's Biodiversity Action Plan. Developers are required to refer to the local Biodiversity Action Plan, "A Natural Renaissance for Lewisham", which sets out the vision and opportunities to deliver biodiversity	No change

		To make more use of the current buildings, particularly when being renovated/extended etc to provide nesting and roosting opportunities for birds and bats. To ensure a minimum of 20% net gain in biodiversity for all new development. To provide nesting opportunities at a ratio of 1 per dwelling for building dependent bird species following the examples of: - Exeter City Council Residential Design Guide SPD (2010). The RSPB South West Regional Office has been working with Exeter Planners over a period of 10 years on the implementation of the biodiversity requirements of this guide and there is acceptance that in many cases the most suitable box type for all cavity nesting birds is the swift brick. - The Duchy of Cornwall adopted the same principles in 2015, and a good example of the provision of a general type of integrated box for all cavity nesting birds is the Nansledan development by The Duchy of Cornwall in Newquay. (https://nansledan.com/nansledan-residents-asked-to-help-with-bird-box-survey/) - The Cornwall Council Biodiversity Guide (2018 gives prescriptive measures for the provision of bat and bird boxes, again at the rate of 1 nest place per new dwelling. This document also includes a case study on Nansledan mentioned above. - The Oxford City Council Technical Advice Note on Biodiversity gives an 'expected provision' of bird nest sites for building dependent birds (i.e. swifts) at a rate of 1 per house and 1 per 2 flats, with separate provision for bats at a rate of 1 per 5 houses. Provision of such nest boxes in schools, student accommodation and hotels is addressed by a ratio of 1 per 250 m2 floor space. - Brighton & Hove City Council have conditioned a minimum of three swift nest bricks or two per dwelling in all new developments that are five metres high or above and commercial developments will be required to have a minimum of three boxes, or one per 50sqm of floor spaces. A similar standard was adopted by the Town and Country Planning Association and the Wildlife Trusts in 2012 Planning for a Healthy Environment - Good Practice for Green Infrastructure and Biodiversity and The Royal Institute of British Architects (RIBA) in 2013. There is photographic evidence that integrated swift bricks are used by a variety of small birds (the amber listed swift, the red listed house sparrow, house martins, blue tits, great tits and the red listed starling (dependent on the size of the entrance hole). Integrated bricks are discrete, maintenance free, less prone to predation and temperature variation than external boxes. Central government has recognised their importance in the following documents: • NPPF, Natural Environment Guidance, paragraph 023, Reference ID: 8-023-20190721 How can biodiversity net gain be achieved2 Provides further guidance stating "…relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat." • Government press release (21/07/19) James Brokenshire, the Communities Secretary at the time of the NPPG Natural Environment publication stated: "For the first time the government has set out its expectations on how developers can protect specific species, including using 'hedgehog highways' and hollow swift bricks – which are installed into the walls of new build homes, allowing the birds to nest safely. This follows public interest for protecting these		including priority species and habitats threatened which needs protection.	

		much-loved animals, with one petition receiving support from over half a million people." Thus, the Government's support for such measures was stated explicitly. • Natural Environment and Rural Communities (NERC) Act 2006 Section 40 states: "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity." • "Living With Beauty" (30/01/20) the Government's Building Better Building Beautiful Commission report recommends: "Bricks for bees and birds in new build homes" (Policy Proposition 33, page 110). **4. Do you think that there are other approaches that should be considered?** **N/A** **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**			
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** Improve tree-planting/street trees in the Borough. Include requirement for Swift bricks/bat-boxes in new build/council buildings. **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Biodiversity and access to nature** **3. Please provide your comments on the topic(s) selected above.** I see no mention of basic, low cost integrated measures for biodiversity such as swift bricks and integrated bat boxes - these are not included the DEFRA net gain for biodiversity calculation which does not protect existing populations of endangered urban birds such as swifts and sparrows for example, and also gives no value to the provision of nest spaces for them. Swift numbers have declined by over 50 percent over the last 25 years. A significant reason is the decimation of their habitats in old buildings and conversions. Swift bricks are very easily incorporated in new-builds. It is vital that the Local Plan includes policies for integrating these measures early, compelling their inclusion at the planning stage. This would also follow London Plan policy (G6B Biodiversity) and national policy (NPPG 2019 Natural Environment). **4. Do you think that there are other approaches that should be considered?** **N/A**	8	Part2 Policy GR3 requires development proposals to identify and retain existing habitats and features of biodiversity value. They are also required to seek positive gains for biodiversity wherever possible, particularly in areas that are deficient in public access to nature conservation. Similarly, the council is working closely with key stakeholders including Lewisham Biodiversity Partnership to ensure that integrated and comprehensive approach is adopted to protect and enhance biodiversity across the borough. Specific local biodiversity requirements has been captured in the Council's Biodiversity Action Plan.	No change

		5. **Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**			
Green Infrastructure		1. **Are there other issues around green infrastructure that the Local Plan should address?** Engagement with school children in the borough so they see the plan as theirs 2. **Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Biodiversity and access to nature** 3. **Please provide your comments on the topic(s) selected above.** I have noticed swift boxes in other places. It would be great if Lewisham could routinely adopt this idea for all new builds. And look at older buildings where this idea could be adopted. Perhaps the council could adopt the udea of swift and bat boxes on all their public buildings. 4. **Do you think that there are other approaches that should be considered?** **As above** 5. **Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** Help school children be part of the plan	4	As part of the local plan process, the council engaged all stakeholders including young children. This is aligned with the council's adopted Statement of Community Involvement which sets out how the public, organisations and other interested parties will be involved and engaged in the preparation of the local plan.	No change
Green Infrastructure		1. **Are there other issues around green infrastructure that the Local Plan should address?** Cater for urban wildlife please 2. **Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **None chosen** 3. **Please provide your comments on the topic(s) selected above.** Swift boxes are an easy, low maintenance thing to do and they will help a wonderful bird species which is struggling in modernising cities across Europe. Bat boxes could also be a good idea. 4. **Do you think that there are other approaches that should be considered?**	11	The Council is committed to ensuring that valued biodiversity are protected or/and enhanced. The Lewisham's local plan sets out policy framework to protect, enhance and provide new biodiversity including wildlife where they are much needed. Part 2 Policy GR3 seek to deliver net gains in biodiversity. On provision of new green spaces within new buildings, the council's open space assessment report (2019) and the London Plan(2021) set out standards to ensure that open spaces are delivered at the right quantity, quality and accessibility.	No change

		Dedicated, completely wild spaces with limited public access are important. We should be able to enjoy nature however I also feel that sometimes some refuge from people is all a lot of animals need. Planting wild flower verges and meadows is a low maintenance, coat effective way to maintain areas of open land and encourage biodiversity **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** Green space should represent a high proportion of any new building plans, including green roofs and walls.			
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** Deliver the reinstatement of the demolished bridge link from Doggett Road over the Hayes railway line to recently built 'Catford Green' SE6 **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Green infrastructure** **Open space and Lewisham's green grid** **3. Please provide your comments on the topic(s) selected above.** The current 'Catford Framework Plan' cannot be rolled out without the reinstatement of the demolished 'green link' bridge that joined over the Hayes railway line from Doggett Road over to the former Catford Greyhound Stadium site [now called 'Catford Green']. The original bridge has stairwell access to all and the Catford Green development clearly and reasonably identified a better site by Dempsey Court for an improved location to suit this 1st phase of Catford's Regeneration - even better, it is designed to be an entirely new 'public highway' bridge for use by all pedestrians/cyclists/those with a disability, etc. In addition, the 'green bridge' would also ensure a reasonable proposal to link Catford Centre to the current Green Chain Walk to join by Honor Oak Park [Green Chain Walk No. 11] via a straight line link as follows - Duncombe Triangle, Blythe Hill Fields, Ravensbourne Park Gardens, Ladywell Fields - over the new 'green link' bridge to Holbeach Primary School/by Catford Centre and then on to Mountsfield Park, etc **4. Do you think that there are other approaches that should be considered?** With regret, the only reasonable alternative to the bridge reinstatement from Dempsey Court, Adenmore Rd, Catford Green to Doggett Rd SE6 is either to continue with pedestrian/cycle access to Catford Centre made from the West of Catford Centre by the South Circular Road by Catford Bridge railway station or to have a 'bolt on' cyclist/pedestrian carriageway installed right next to the South Circular Road on the current Halfords/Wickes site and on the opposite side to Catford Centre to render this option entirely useless. This option would also require the crossing of the Hayes railway line.	3	This is not within the scope of the Local Plan consultation and is also addressed through the Council endorsed Catford Framework.	No change

		5. **Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** The ongoing and fatal flaw in Catford will continue to be the resolution to the 'green' crossing of the Hayes railway line. It is the inescapable fact and reality.			
Green Infrastructure		1. **Are there other issues around green infrastructure that the Local Plan should address?** **Yes** 2. **Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Green infrastructure** 3. **Please provide your comments on the topic(s) selected above.** I think you should make sure you include swift and sparrow nesting boxes on buildings and areas for raptors on roofs, as so many new buildings have no areas for birds to nest and their populations are declining. Creaing space for animals eg foxes v hedgehogs is necessary too 4. **Do you think that there are other approaches that should be considered?** **N/A** 5. **Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**	3	Specific biodiversity requirement will be addressed at the planning application stage. This will be aligned with the Lewisham's Biodiversity Action Plan. Further, the council's local plan Part 2 Policy GR3 seeks to deliver net gains in biodiversity. Specific local biodiversity requirements are captured in the Lewisham's Biodiversity Action Plan.	No change
Green Infrastructure		1. **Are there other issues around green infrastructure that the Local Plan should address?** Integrated measures for biodiversity. 2. **Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Biodiversity and access to nature** 3. **Please provide your comments on the topic(s) selected above.** The policies to enhance green infrastructure are welcome but it's important to also provide integrated measures for biodiversity such as swift bricks, integrated bat boxes, and hedgehog highways - these fall outside the DEFRA net gain for biodiversity calculation which does not protect existing populations of endangered urban birds such as swifts and sparrows for example, and also gives no value to the provision of nest spaces for them which they cannot find in modern buildings.	7	Part2 Policies GR1/GR2/GR3 promotes an integrated approach for green infrastructure network and biodiversity. The local plan required developers to identify and retain existing habitats and features of biodiversity value and seek positive gains for biodiversity. Similarly, the council is working closely with key stakeholders including Lewisham Biodiversity Partnership to ensure that integrated and comprehensive approach is adopted to protect and enhance biodiversity across the borough. Specific local biodiversity requirements has been captured in the Council's Biodiversity Action Plan.	No change

		Standard bird boxes, bat boxes and insect hotels have a short lifetime in comparison and have maintenance requirements that are often neglected. Therefore it is crucial that the Local Plan includes policies for such integrated measures. This would also follow London Plan policy (G6B Biodiversity) and national policy (NPPG 2019 Natural Environment). **4. Do you think that there are other approaches that should be considered?** **N/A** **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**			
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** Specifying independently appointed (and qualifications specified) to carry out ecological assessments **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Green infrastructure** **Food growing** **3. Please provide your comments on the topic(s) selected above.** Requirements on developers need to be framed in much more robust language in the requirements, i.e. "MUST" / "SHALL" - not "should" or "we expect that". Permitting "wriggle room" needs to be avoided where the aim is clear. All development proposals MUST be in alignment with the Climate Action Plan - and the Climate Crisis MUST be taken seriously. To encourage food growing, there would ideally be an incentive of some kind, possibly a reduction in Council Tax (where this can be proved... This may also be an incentive that could be considered in other areas benefiting from behavioural changes. **4. Do you think that there are other approaches that should be considered?** **N/A** **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**	5	Part 2 Policy GR3 requires that Ecological Assessment be carried out by certified Ecological assessor on all major development and other development proposals on sites with special biodiversity interest. The draft policy on green infrastructure is robust and aligned with the provision sets out in the National Planning Policy Framework (2021) and the London Plan.	No change
Green Infra		**1. Are there other issues around green infrastructure that the Local Plan should address?**	3	The Council's local plan ensures that open space and green infrastructure network are integral part of	No change

structure		Insufficient attention to detail on servicing of open space, e.g. litter collection, separation of pedestrian and cycle routes, careful management of vegetation and planting, and adequate management of nature reserves. All these factors require detailed input. **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Open space and Lewisham's green grid** **3. Please provide your comments on the topic(s) selected above.** Re GR2D: there is currently massive over-development of skyscrapers in town centre with no integral green space apart from the tiny Confluence Park. If further development is planned on Loampit Vale (e.g. area between Jerrard Street and Thurston Road), it must be for green space only otherwise the air quality will be dangerously toxic. **4. Do you think that there are other approaches that should be considered?** **N/A** **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**		development proposals when required. Part2 Policy GR1 requires developers to maximise the opportunities to enhance existing green infrastructure and create new provision. Similarly, Part2 Policy GR2 supports ancillary uses on open space (such as outdoor leisure facilities, outdoor play and fitness equipment, refreshment facilities, event space and public toilets) to improve the quality of the open space.	
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** Include Noise enforcement in the conversation about pollution. **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Noise pollution** **3. Please provide your comments on the topic(s) selected above.** Air pollution is not just gas and particles, it is also sound and vibration. Far too little attention is given to noise pollution, especially in Lewisham where the service provided is exceptionally poor - even compared to other London Boroughs which are equally short of money. Green Issues are ultimately about quality of life for humans as well as the rest of nature. Noise issues are not addressed anywhere in the local plan. **4. Do you think that there are other approaches that should be considered?** Enforcement of existing law would help. How many cars and motor cycles are ever prosecuted for deficient mufflers? Probably zero.	5	The council's local plan has adequate provision to manage noise pollution. Part2 Policy QD8 ensure that noise is managed to acceptable levels. Development proposals are required to submit a Noise and/or Vibration Assessment where sites are located in high-noise areas or where a new development is likely to generate significant noise. The London Plan is part of the council's development plan. It sets out strategic direction for the Lewisham's local plan. Policy T8 of the London plan provides adequate policy framework on air transport and aviation issues. On enforcement of cars and motor cycles behaviours is outside the scope of this local plan.	No change

		Why has Lewisham been so derelict in opposing flight paths over the residential areas of the Borough? Why is there no agency responsible for excessive railway noise? The Borough should be advocation speed limits through built up areas. **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**			
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Green infrastructure** **Open space and Lewisham's green grid** **3. Please provide your comments on the topic(s) selected above.** There is no large park in the Deptford Area. Assembling one would be hard but it would be good if a public park of size was assembled and made available. The council needs to re-establish the riverside access to the Thames pathway. All planning consents should mandate this. The council should do what it can to establish view points or resting points or mini parks on its limited riverside estate. The nearest large parks are Hilly Fields and Southwark Park which are both distant and potentially difficult to reach by foot from parts of the borough north of the A2. **4. Do you think that there are other approaches that should be considered?** **N/A** **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**	1	The Lewisham local plan allows for provision or/and enhancement of open space and green infrastructure network. Part2 Policy GR1/GR2 supports the creation and enhancement of open spaces and green infrastructure network. The Council has commissioned a consultant to carry out Open Space and Metropolitan Open Land (MOL) Review to informed land-use designations for the local plan. The outcome of this study will help to inform policy including designation of new open spaces.	No change
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Open space and Lewisham's green space** **Biodiversity and access to nature** **Urban greening and trees**	2	Noted. The main of the local plan is to promote sustainable and balanced growth across the borough. This ensures that employment, housing and the environment is managed sustainably. The Council has commissioned a consultant to carry out Open Space and Metropolitan Open Land (MOL) Review to informed land-use	No change

		3. Please provide your comments on the topic(s) selected above. I like what you say, but the north of the Boro needs a bigger park, the nearest large park is Hilly Fields which is a bit of a journey from Deptford as is Southwark park by foot.. Views as to distance has been concentrated by the lockdown. An alternative would be better access to the Thames, much of Lewisham's Thames banks are enclosed by private developments, planning constraints should be put on all developments on the Thames to restore the pathway and provide park space. Mandate trees in planning consents. It's obvious that there is competition for land use between housing and green infrastructure, this needs to be resolved in a balanced way. **4. Do you think that there are other approaches that should be considered?** The Ravensbourne is not a public space. Can this be reclaimed? **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**		designations for the local plan. The outcome of these studies will help to inform policy development including designation of new open spaces.	
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** Street Tree planting, Existing green space maintenance and Gardens with greater horticultural input. **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Urban greening trees** **3. Please provide your comments on the topic(s) selected above.** many of the new buildings currently being built don't have roof terraces for the residents. These roof terraces with gardens/planting/allotments could have been easy wins. This could be a lesson for future planning applications in the boroughs **4. Do you think that there are other approaches that should be considered?** Green space and public realm cannot be token gestures by the developers. They need to be led with incisive leadership and guidance by the Lewisham Council. Documents similar to City of London's public realm manual need to be issued. Strict overview during the planning process with input from the Lewisham Open Spaces team should be mandatory. **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**	7	There is adequate provision in the local plan on tree planting particularly along streets. Part2 Policy GR4 of the Lewisham's local plan supports this. With regards to maintenance of existing green space and community gardens is outside the scope of this plan. However, at planning application stage, the developer will be required to address maintenance issues. Similarly, Policy GR4 promotes the use of living roofs and walls. Open space and green infrastructure issues are sufficiently addressed in the local plan. Refer to Part 2 Policy GR1 and GR2 of the Lewisham local plan.	No change

Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** There should be more opportunities for local people to become involved with increasing and improving green infrastructure. Tree planting in streets and parks should be better supported by the Council. The proposals seem to emphasise role of developers in sustaining green infrastructure but not people that live in the Borough. **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Green infrastructure** **Open space and Lewisham's green grid** **Biodiversity and access to nature** **Urban greening and trees** **Food growing** **3. Please provide your comments on the topic(s) selected above.** There should be more opportunities for local people to become involved with increasing and improving green infrastructure. Tree planting in streets and parks should be better supported by the Council. The proposals seem to emphasise role of developers in sustaining green infrastructure but not people that live in the Borough to improve green infrastructure, which is a missed opportunity. The Council's process for planting street trees in the Borough is very expensive for people that would like to plant street trees and is out of reach for most people due to the cost. **4. Do you think that there are other approaches that should be considered?** Support for projects to improve green infrastructure that people experience in parks, open spaces and on streets. Better protection for existing trees in parks open spaces and streets and an imaginative programme of tree planting to replace the hundreds if not thousands of small and large canopy trees that we have been felled in the Borough during recent decades. More space should be allocated for biodiversity. Turn grey streets into green spaces. Green infrastructure should be more joined up and connected. **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**	7	Noted. The local plan policy on green infrastructure provides policy framework that supports the participation of all stakeholders including local people in the delivery of green infrastructure. Policy GR1/GR2 supports development proposals to enhance existing infrastructure and create new provision. Part 2 Policy GR3 seek to deliver net gains in biodiversity. Also, Policy GR4 requires development proposals to seek the retention of existing trees and associated habitat and maximise opportunities for additional tree planting and green infrastructure.	Noted.
Green Infra		**1. Are there other issues around green infrastructure that the Local Plan should address?** **N/A**	1	Noted.	No change

structure		2. **Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Green infrastructure** **Urban greening and trees** 3. **Please provide your comments on the topic(s) selected above.** The commercial arcade running along Queens Road in Peckham to New Cross and beyond could be vastly improved by the planting of more trees. It is a thoroughfare with loads of potential and trees are part of realising that potential 4. **Do you think that there are other approaches that should be considered?** **N/A** 5. **Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** Improving cycling routes is also green infrastructure! Trading car parking spaces for spaces for trees and bikes will help Lewisham become a greener borough.			
Green Infrastructure		1. **Are there other issues around green infrastructure that the Local Plan should address?** **N/A** 2. **Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Urban greening and trees** 3. **Please provide your comments on the topic(s) selected above.** Turn Lawrence House car park into a green space. 4. **Do you think that there are other approaches that should be considered?** The plan is contradictory. On the one hand we are talking about protecting green spaces but on the other talking about building on green spaces.... cannot take the plan seriously due to this. 5. **Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**	1	Officers believe that the local plan is robustly prepared. This is aligned with national and local policies and guidance including the National Planning Policy Framework (NPPF) (2021) and the London Plan. The main aim of the local plan is to promote sustainable and balanced growth across the borough. This ensures that employment, housing and the environment is managed sustainably.	No change
Green Infra		1. **Are there other issues around green infrastructure that the Local Plan should address?**	6	The local plan policies does not only support parks but also provide policy framework for the provision or/and	No change

structure		**N/A** **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Urban greening and trees** **3. Please provide your comments on the topic(s) selected above.** It's not just about parks - we need more street trees, micro forests, even orchards. **4. Do you think that there are other approaches that should be considered?** **N/A** **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**		enhancement of open space and green infrastructure network. Part 2 Policy GR4 promotes urban greening including tree planting, green roofs and walls, hedges, climbers, landscaping and rain gardens.	
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** The allocation of sites for housing should not include sites with significant biodiversity value and mature trees **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Biodiversity and access to nature** **Urban greening and trees** **Green infrastructure** **3. Please provide your comments on the topic(s) selected above.** The council states that it is imperative that wildlife habitats are protected it has allocated a site, Havelock House, in the West Area for housing development which is a green site with significant biodiversity value containing mature trees and other vegetation forming part of an important wildlife corridor. Any development on this small site would cause significant harm to biodiversity interests. This is directly counter to the principles set out in the Plan in the Green Infrastructure section. **4. Do you think that there are other approaches that should be considered?** The Site could instead be considered for ADDITIONAL Tree planting ADD to the Borough's urban forest and to support the objectives to increase biodiversity and to support the London Plan to be 50% green by 2050 **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?**	5	Site allocations in the local plan went through vigorous site assessment process including the use of Sustainability Appraisal. This ensures that Social, environmental and economic aspects are all taken into consideration in the process and policy development. Part2 Policy GR3 expects development proposals to identify and existing habitats features of biodiversity value. In addition, developers are required to seek positive gains in biodiversity wherever possible especially in areas that are deficient in supply. Part 2 Policy GR1 require development proposals to maximise the opportunities for enhancing existing green infrastructure and creating new provision.	No change.

		The Green Infrastructure section of the plan should be a priority in the Site Allocation for Development in all the Borough's Areas			
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Green infrastructure** **Open space and Lewisham's green grid** **Biodiversity and access to nature** **Urban greening and trees** **Food growing** **3. Please provide your comments on the topic(s) selected above.** Lewisham's green spaces are one of the best things about the borough. They need to be protected and maintained so it's great to see a real focus on this in the plan. As you have outlined, some residents do not have good access to green spaces, especially in new developments where the proportion of flats vs communal green space is absolutely shocking. Please address this urgently! A tiny little park with two benches, for a development of hundreds of flats really is a joke. ALL new developments should be required to have public/green spaces, not just "larger ones" (whatever that means). You say "Creating new large open spaces will be challenging as land is needed for homes and jobs." which sounds like a cop out. Spaces don't need to be "large", if you create many of them. Focusing on homes and jobs to the detriment of the environment is exactly what got us to the climate crisis, so it can not be a strategy for the future. We won't have a healthy sustainable planet to live and work on if we think this way. Improving walking and cycle paths should be number one priority to help reduce carbon emissions and make it possible for people to be car free. Cycle storage and parking needs to be made possible for residents who live in flats. **4. Do you think that there are other approaches that should be considered?** Lewisham should consider creating urban mini forests (as other councils around the country are doing, e.g. Bristol) on suitable plots where even just 5 trees would make a difference. Areas in existing parks could also be set aside for tree planting, this could even be an activity that young people in the borough participate in. A mix of open space and areas with more tree cover in parks would do a lot for biodiversity and make a difference towards carbon reduction targets. **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**	7	The Lewisham's local plan has policy provision that ensures that the right type of open spaces are provided at the right places within the right accessible distance. Part 2 Policy GR1/GR2 supports the delivery of new open spaces and the protection of existing one when needed in the local area. It also provides policy framework to ensure the delivery of green infrastructure network including walking and cycle paths. Similarly, the main aim of the local plan is to promote sustainable and balanced growth across the borough. This ensures that the right amount of employment, housing and open spaces, and green infrastructure are delivered sustainably.	No change

Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Open space and Lewisham's green grid** **Biodiversity and access to nature** **Urban greening and trees** **3. Please provide your comments on the topic(s) selected above.** There are real opportunities to green communities through micro gardens, pollution eating planting and more trees. Many green spaces are in poor condition. Prioritising walking and cycling on back streets that connect communities would carry a health and well-being premium and improve community cohesion **4. Do you think that there are other approaches that should be considered?** **N/A** **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**	7	Part 2 Policy GR1/GR2 supports the delivery of new open spaces and the protection of existing one when needed in the local area. It also provides policy framework to ensure the delivery of green infrastructure network including walking and cycle paths which supports connected communities and health and wellbeing of residents. The local plan ensures that green infrastructure assets including parks, residential gardens, and street trees are delivered in areas of deficiency.	No change
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **None chosen** **3. Please provide your comments on the topic(s) selected above.** Not sure that I could see any reference to the Convoys Wharf site - which forms a major part of Lewisham's Thames access. Perhaps consideration for this area would be useful in terms of full pedestrian access along the River Thames at the Convoys Wharf site with better integration with Thames long-distance path. **4. Do you think that there are other approaches that should be considered?** **N/A** **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?**	3	The Thames Pathway is referenced in a number of places in the Local Plan and is a key requirement in the Convoys wharf Site allocation	No Change.

		N/A			
Green Infrastructure		1. **Are there other issues around green infrastructure that the Local Plan should address?** The overall statements are strong but the detail is very week and important biodiversity assets are omitted i.e..Buckthorne Cutting 2. **Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Biodiversity and access to nature** **Green infrastructure** **Geodiversity** **Urban greening and trees** 3. **Please provide your comments on the topic(s) selected above.** Maps are unclear and don't include important infrastructure and green links such as Great North Wood sites and Green Peaks Walk. Buckthorne Cutting not included - has been inputting in to Lewisham Biodiversity data for 4 years, is proposed by GeoPartnership London as a Geological Site of borough wide importance and is part of Great North Wood. How can trees be protected with only one tree officer? 4. **Do you think that there are other approaches that should be considered?** Need to look at Woodland Trust tree guidance and planning needs to start on basis that biodiversity assets are priority sites and that any development on these sites will be refused. The knowledge and commitment to biodiversity in the planning dept at Lewisham seems very weak. 5. **Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** More collaboration with nature reserves needed as well as your own biodiversity green team - Jessica Kyle. Were they consulted on the maps for example?	6	Officers believe that the local plan policies on Green Infrastructure is consistent with the National Planning Policy Framework (NPPF) 2021 and the London Plan. In addition, the Council has commissioned an Open Space and Metropolitan Open Land Review which will support the open space policies and designations.	The green infrastructure policies has been reviewed to reflect open space MOL reviews.
Green Infrastructure		1. **Are there other issues around green infrastructure that the Local Plan should address?** Tree Planting 2. **Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **None chosen** 3. **Please provide your comments on the topic(s) selected above.**	3	Part 2 Policy GR4 seeks to promote tree planting. The policy requires development proposals to maximise the opportunities for additional tree planting and green infrastructure especially trees in urban settings such as streets.	No change

		Trees should be planted along the streets. 4. **Do you think that there are other approaches that should be considered?** **Tree planting** 5. **Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **Tree planting**			
Green Infrastructure		1. **Are there other issues around green infrastructure that the Local Plan should address?** look at more street tree planting particularly busy high streets and roads e.g. Brockley Road, South Circular 2. **Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Green infrastructure** **Biodiversity and access to nature** 3. **Please provide your comments on the topic(s) selected above.** encourage more local street tree planting create more local natures reserves and recognise existing sites of importance for nature conservation site e.g, Buckthorne Road cuttting (Fourth Reserve). 4. **Do you think that there are other approaches that should be considered?** **N/A** 5. **Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**	7	The Lewisham local plan Part 2 Policy GR4 seeks to promote tree planting. The policy requires development proposals to maximise the opportunities for additional tree planting and green infrastructure especially trees in urban settings such as streets. The council is carrying out additional open space study and the Metropolitan Open Land review. This will be assessing additional sites for allocation and those that should be afforded protection. These studies will then be used to inform revisions to the green and open space policies and designations.	In accordance with the Open Space Review and MOL Review Update, designations.
Green Infrastructure		1. **Are there other issues around green infrastructure that the Local Plan should address?** **N/A** 2. **Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Urban greening and trees** **Biodiversity and access to nature** 3. **Please provide your comments on the topic(s) selected above.**	8	The council's local plan policy on green infrastructure promotes urban greening approach. This encourages wide range of measures to incorporate into buildings and spaces green cover including biodiverse landscaping, tree planting along streets, green roofs, local parks and other natural features.	No change

		Surface level car parks broadly within residential areas such as Clarendon Rise and Slaithwaite Road should be transformed into parks. This has many benefits including providing significant areas of green space to residents of the borough, especially those living within the nature deficient Lewisham town centre, as well as discouraging car use both generally and through the residential streets surrounding these car parks. This would help to achieve the boroughs goals for providing green space as well as encouraging a modal shift to more sustainable forms of transport. While urban tree planting along streets should be encouraged it can often constrain the pavement width and make walking side by side more difficult and less pleasant, in many ways defeating the object. On quiet residential streets consideration should be given to tree planting on build outs into the roadway as opposed to the pavement where this is likely to be a problem. Done correctly this can have the added benefit of slowing vehicle traffic and making a more pleasant environment for active travel. **4. Do you think that there are other approaches that should be considered?** **N/A** **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**			
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Doorstep green spaces** **3. Please provide your comments on the topic(s) selected above.** Green infrastructure needs to include the doorstep green spaces too. Lewisham homes are not just private sector homes, but contain a large number of public and third sector housing. All homes can and do contain green spaces. Gardens around housing blocks, empty gaps at the end of streets, roof areas on public / Council properties, etc. all need to be considered for their impact as part of the Borough's green infrastructure and mission to make Lewisham Greener. In particular, where Lewisham owns or manages property, it should take the responsibility and initiative to make the most of its green spaces: for example, supporting tenants to build and maintain gardens; developing new green spaces among the bricks & mortar for its local community; and removing barren & unkempt spaces around the Borough. **4. Do you think that there are other approaches that should be considered?** Local communities would be willing to help and continue to maintain green spaces, if they were actively encouraged to do so by the Council.	6	The Lewisham local plan policies on open space and green infrastructure promotes the provision of amenity green space around residential areas. In addition, the council's local plan policy on green infrastructure promotes urban greening approach. This encourages wide range of measures to be incorporated into buildings and spaces green cover including biodiverse landscaping, tree planting along streets, green roofs, local parks and other natural feature.	No change

		5. **Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**			
Green Infrastructure		1. **Are there other issues around green infrastructure that the Local Plan should address?** Protection order on all green spaces including open grass spaces on estates as these could so easily be sold for housing at the expense of the children on the estate. 2. **Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **None chosen** 3. **Please provide your comments on the topic(s) selected above.** **N/A** 4. **Do you think that there are other approaches that should be considered?** **N/A** 5. **Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**		Part 2 Policy GR1/GR2 supports the delivery of new open spaces and the protection of existing one when needed in the local area. .	No change
Green Infrastructure		1. **Are there other issues around green infrastructure that the Local Plan should address?** This is an area where everyone in the |Borough can make a difference but there does not seem to be much of a drive for community activity. 2. **Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **None chosen** 3. **Please provide your comments on the topic(s) selected above.** **N/A** 4. **Do you think that there are other approaches that should be considered?** Greater engagement with the community would lead to better outcomes with little effort. The Council needs to lead the way but this is an area where all can play a part.	3	The preparation of the local plan requires the council to engage proactively with wider stakeholders including local residents and community groups, businesses, infrastructure providers, land owners and infrastructure providers and neighbouring authorities to ensure that the local plan reflects the aspirations of the local communities in the borough.	No change

		5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan? **N/A**			
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** **Green infrastructure** **Open space and Lewisham's green grid** **Biodiversity and access to nature** **Urban greening and trees** **Food growing** **3. Please provide your comments on the topic(s) selected above.** Lewisham has 20% green spaces. It would be great to find sites for additional green spaces and work with local people to make them accessible and user-friendly. Planting more trees: Tree-planting by and for the community seems to be popular but people need basic training in after-care of those trees so the trees can survive the first five years; training can be provided by volunteers. Encourage food-growing in community green spaces, things like salad leaves, herbs, fruit bushes - though a bit of basic training is important. Have areas that can be managed for wildlife within any new green space. **4. Do you think that there are other approaches that should be considered?** More green spaces with food/ wildlife in school grounds and less of the astro-turf that does nothing for nature. **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**	8	The council local plan has policy provision that promotes the creation or/and enhancement of green infrastructure network. Part 2 Policy GR4 seeks to promote tree planting. The policy requires development proposals to maximise the opportunities for additional tree planting and green infrastructure especially trees in urban settings such as streets. With regards to providing training on tree management is outside the scope of this plan. Further, allotments and community gardens are key part of the Borough's network of green infrastructure. This supports local food production and biodiversity creation. This provides opportunity for social interaction. Part 2 Policy GR5 supports allotments and community gardens in the borough.	No change. .
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** Hither Green west of the tracks has been missed. Why is there no provision to Green links to Mountfield Park? **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below**	2	The council is carrying out additional open space study and the Metropolitan Open Land review. This will be assessing additional sites for allocation and those that should be afforded protection. These studies will then be used to inform revisions to the green and open space	No change

		Open space and Lewisham's green grid **Urban greening and trees** **Green infrastructure** **3. Please provide your comments on the topic(s) selected above.** . Green links to be introduced in Hither Green west of the tracks. There is no provision in the document at all for any improvements. Why has this area been overlooked again? **4. Do you think that there are other approaches that should be considered?** Invest in the less affluent areas of Lewisham not just the middle class areas. Hither Green West of the tracks looses out again in your plan. Not even the community garden is identified. **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** **N/A**		policies and designations	
Green Infrastructure		**1. Are there other issues around green infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to green infrastructure? Select the topic(s) and comment below** Driveways **3. Please provide your comments on the topic(s) selected above.** Too many people pave over their driveways and / or gardens, allowing nowhere for water to drain - why not insist on something more environmentally friendly like gravel?? **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Green Infrastructure' section of the Local Plan?** N/A	12	There are Permitted Development Rights over which the Council exercises no planning control, including the paving over of front gardens and driveways. Where planning permission is required, the draft Local Plan includes policies on Sustainable Drainage and urban greening.	No change.
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** Integrated measures for biodiversity **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Biodiversity **3. Please provide your comments on the topic(s) selected above.** Biodiversity should be an integral part of sustainable design, as measures such as green roofs & green walls, water features, swift bricks & bat boxes need to be designed in from the earliest possible design stage if their effectiveness for biodiversity is going to be maximised	0	Noted.	Local Plan amended with new policy on Biodiversity Net Gain, in line with provisions of Environment Act 2021.

		4. Do you think that there are other approaches that should be considered? Clear mandatory targets such as the RIBA (2013) standard for 1:1 nestbox per dwelling on average would give clarity and increase likelihood of such measures being designed in from an early stage. **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** N/A			
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Sustainable design **3. Please provide your comments on the topic(s) selected above.** Insist on passive house design: The required technologies are now widely available, e.g. low u-value fabric, heat pumps, solar gain architecture, etc. Firm up the sustainability requirements for new housing: Do not allow exceptions! Have the low-carbon designs evaluated by an independent consultant not paid for by the developer! Do not include parking for new builds except for disability parking. **4. Do you think that there are other approaches that should be considered?** Remove parking spaces in the borough and replace the space with cycle lanes or wider sidewalks, add more trees in residential areas. **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** N/A	0	The draft Local Plan policies on sustainable design and construction, including zero carbon development, are considered to be in general conformity with the London Plan. The introduction of higher standards could have an impact on development viability and in turn limit the council's ability to secure other requirements, such as affordable housing. A balance must therefore be struck. However it is recognised that the plan could be amended to address 'non-regulated carbon emissions' and sustainable retrofitting of the existing building stock. Parking provision will need to be carefully managed, particularly the use of existing spaces. The Council's Transport service is responsible for parking management. The draft Local Plan will be amended to reflect the new London Plan parking standards.	Local Plan amended to make clear that building sustainability assessments must be carried out by suitably qualified and independent assessor. Local plan amended to with new policies on 'non-regulated carbon emissions' and sustainable retrofitting of the existing building stock. Local Plan amended to fully align with London Plan parking standards, including standards for car-free and car-lite development.
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** Recycling **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Reducing and managing waste **3. Please provide your comments on the topic(s) selected above.** There are zero recycling ♻ facilities in Hither Green west of the railway: Fluorescent Lamps (they contain Mercury!!) - no facilities Textiles - no facilities	0	The council recently adopted the Lewisham Waste Strategy 2021-2031. This sets out objectives and priorities for provision of recycling facilities. Where additional strategic provision is required over the plan period, for example recycling centres, this is set out in the Infrastructure Delivery Plan. The draft Local Plan includes policies to ensure that new developments make adequate arrangements for the provision of on-site facilities for waste disposal and recycling.	Local Plan monitoring framework amended to include targets for waste management and recycling. Local Plan amended to refer and clarify approach to delivering net waste self-sufficiency in line with the waste hierarchy. Local Plan amended to refer the council's latest waste strategy.

		Lewisham Council website suggests go to the Landmann Way site. We don't have a car. If Lewisham Council say 'Climate change emergency' and you are promoting '15 minute neighbourhoods. Why are there no services to support this? **4. Do you think that there are other approaches that should be considered?** Put in recyling services **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** Put in recyling services			
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Improving air quality **3. Please provide your comments on the topic(s) selected above.** Air quality will not improve unless steps are taken to reduce car use in the borough. We have a number of main roads (south circular, Lee High rd, Lewisham high St, Bromley Rd to name a few), which remain main thoroughfares, but the cutting of though traffic in residential areas has a measurable improvement in air quality for people living both in and around these areas. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** No	0	The draft Local Plan includes a range of measures to address poor air quality in Lewisham and London, including through encouraging and enabling modal shift away from car use. In additional, the plan promotes the application of the Healthy Streets Approach, particularly on major roads, to address poor air quality, where some roads are Air Quality Management Areas. However it is acknowledged that the plan should be amended to bring the air quality standards on new developments in line with the London Plan.	Local Plan amended to require all developments to be a minimum air quality neutral.
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Minimising greenhouse gas emissions **3. Please provide your comments on the topic(s) selected above.** All new buildings should be designed to be energy efficient: the Passivhaus standard/Future Homes Standard for 2025 should apply today fo all new buildings. It is much easier to install low energy solutions by design than to retrofit. Carbon offsetting should not be an option for any new build. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** N/A	0	The draft Local Plan policies on sustainable design and construction, including zero carbon development, are considered to be in general conformity with the London Plan. The introduction of higher standards could have an impact on development viability and in turn limit the council's ability to secure other requirements, such as affordable housing. A balance must therefore be struck. However it is recognised that the plan could be amended to address 'non-regulated carbon emissions' and sustainable retrofitting of the existing building stock.	Local plan amended to with new policies on 'non-regulated carbon emissions' and sustainable retrofitting of the existing building stock.
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?**	0	The Local Plan deals with the use and management of land. As a dietary and	No change.

		Add another action point to SD1.B "To help ensure that the Borough develops in a way that is environmentally sustainable the Council will ensure that all Council run properties, event and functions will provide a substantial vegan option at every opportunity **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Responding to the climate emergency Minimising greenhouse gas emissions Veganism **3. Please provide your comments on the topic(s) selected above.** Veganism is the quickest way an individual can minimise their GHG emissions as their personal response to the climate emergency. Lewisham Council should help enable and promote this action as part of their striving to address global climate change **4. Do you think that there are other approaches that should be considered?** Moving all of Council's food provision over to a plant-based, vegan one is the best way to ensure the Council does all it can to mitigate and reduce its impact on climate change. Anything short of that is a failure to make the maximum changes possible. **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** Providing vegan cookery lessons at The Lewisham Training Kitchen is something easy to do and could encage multiple communities and stakeholders		lifestyle matter, veganism is outside the scope of the Local Plan. However, it is noted the economy and culture policies provide flexibility for restaurants and other businesses supporting vegan options to locate within town centres. The Council's Climate Emergency Action Plan includes actions to raise awareness of and support veganism.	
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** The plan is unambitious compared to other local authorities on some aspects. **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Responding to the climate emergency Design to support the circular economy Managing the risk Improving air quality Minimising greenhouse gas emissions Reducing and managing waste Reducing flood risk Sustainable drainage Water management **3. Please provide your comments on the topic(s) selected above.** The plan has big aspirations but is light on detail on how this will realistically be monitored and achieved. Many aspects such as energy efficient housing are already part of planning regulations. Additional commitments and policy changes are needed to make a substantial difference and back up the declaration of a climate emergency in the borough. Declaring a climate emergency is not an achievement in itself. Making substantial changes and setting higher environmental standards will result in genuine improvements. **4. Do you think that there are other approaches that should be considered?**	1	Disagree that the plan is unambitious. The Local Plan provides for a significant step change in the local policy framework for climate change adaptation and mitigation, as well as urban greening and the management of green infrastructure. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The Council will continue to work with and lobby TfL for improved bus services throughout the Borough, including services to and between key transport nodes. Low Traffic Neighbourhoods are outside the scope of the Local Plan.	Local Plan parking policies amended to fully align with London Plan standards, including car-free and car-lite development. Local plan amended to with new policies on 'non-regulated carbon emissions' and sustainable retrofitting of the existing building stock. Local Plan amended to refer and clarify approach to delivering net waste self-sufficiency in line with the waste hierarchy. Local Plan amended to refer the council's latest Waste Strategy.

		The cycling infrastructure is poor in many parts of the borough and Lewisham lags behind other London boroughs in this respect. There is not a big enough commitment to create continuous quiet routes for cyclists to traverse the borough. Many junctions and road sections are particularly hazardous. Many policies in the plan will be at odds - for instance options to retrofit existing buildings will be competing with the drive for densification. New buildings have a very high carbon footprint, requiring extremely large amounts of concrete etc. Retrofit options should be considered more favourably. Transport policy is not always carefully thought out and more collaboration with TfL is needed. Parking is being reduced at a time when trains stations are seeing a reduction in train routes (eg Southern services). Some train stations in the borough lack any bus link. Wood burning stoves, garden burners etc should be strongly discouraged - emissions from even 'clean' wood sources are toxic and unnecessary. Campaigns to educate residents would be useful - eg switching from coal to gas BBQs. Businesses should not be allowed to use diesel generators on an ongoing basis. The plan is very ambitious regarding assessment of new developments, at a time when resources in the council are stretched. Whether heat management in new buildings is realistically going to be scrutinised is unclear, particularly with the drive for densification - a single aspect, south facing flat, will be difficult to cool or ventilate in the height of summer. Mature trees are highly effective in heat management and they are typically undervalued. Statements about new trees being planted are akin to greenwashing, they are often not large species and a significant proportion will not thrive with poor aftercare etc. Existing trees are graded for quality as A/B/C but there is no quality standard or critical assessment of tree planting proposals or aftercare plans. The impact of LTNs on busier roads need to be honestly assessed. They often result in less affluent areas bearing the brunt of traffic pollution. Traffic solutions need to reduce the traffic for everyone, not the lucky few. Fly tipping is on the rise in the borough, waste management facilities are not accessible enough. Additional local recycling facilities are needed in other locations. The few points for items such as electrical goods are usually overflowing. The underground springs in hilly areas such as Wells Park and Crystal Palace are not being properly considered when assessing new developments - particularly where pile driving, underground car parks etc are planned. The consequences are that spring water is diverted elsewhere. The increased water flow at the Hillcrest Estate is evidence of this, but it is not taken seriously and is omitted from the plan. The long-term risks of subsidence can leave homes uninsurable. **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** N/A		The draft Local Plan policies on sustainable design and construction, including zero carbon development, are considered to be in general conformity with the London Plan. The introduction of higher standards could have an impact on development viability and in turn limit the council's ability to secure other requirements, such as affordable housing. A balance must therefore be struck. However it is recognised that the plan could be amended to address 'non-regulated carbon emissions' and sustainable retrofitting of the existing building stock. The Local Plan Part 2 section on Green infrastructure includes provision on tree protection and management, and tree planting. It clearly sets out that "Development proposals will be expected to retain and protect existing trees, ensuring they can be sustained over the long-term. This includes trees of quality which are Category A and B trees as defined by British Standard BS5837:2012 and also Category C & U trees within biodiverse habitat areas". The council recently adopted the Lewisham Waste Strategy 2021-2031. This sets out objectives and priorities for provision of recycling facilities. Where additional strategic provision is required over the plan period, for example recycling centres, this is set out in the Infrastructure Delivery Plan. The draft Local Plan includes policies to ensure that new developments make adequate arrangements for the provision of on-site facilities for waste disposal and recycling. The draft Local Plan policies on water management include provisions around flood risk management that	

				must be taken into account for new development proposals.	
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Improving air quality Responding to the climate emergency Minimising greenhouse gas emissions **3. Please provide your comments on the topic(s) selected above.** Mitigating air quality is not good enough, it has to be improved. The climate emergency means immediate action is needed on sustainable design codes. The planet can't wait. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** N/A	0	The draft Local Plan includes a range of measures to address poor air quality in Lewisham and London. However it is acknowledged that the plan should be amended to bring the air quality standards on new developments in line with the London Plan.	Local Plan amended to require all developments to be a minimum air quality neutral, and seek to improve air quality.
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Non chosen **3. Please provide your comments on the topic(s) selected above.** N/A **4. Do you think that there are other approaches that should be considered?** Wood burning fires should be banned as an unacceptable source of PM2.5 pollution and airway irritants. **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** N/A	1	Wood burning fires, such as for outdoor stoves, barbeques and fire pits, are outside the scope of the Local Plan.	No change.
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Responding to the climate emergency Improving air quality Minimising greenhouse gas emissions Reducing and managing waste	1	The draft Local Plan policies on sustainable design and construction, including zero carbon development, are considered to be in general conformity with the London Plan. The introduction of higher standards could have an impact on development viability and in turn limit the council's ability to secure other requirements,	Local plan amended to with new policies on 'non-regulated carbon emissions' and sustainable retrofitting of the existing building stock. Local Plan amended to make clear that carbon offsets should be a last resort. Local Plan parking policies amended to fully align with London Plan parking standards,

		Sustainable drainage Water management Energy infrastructure **3. Please provide your comments on the topic(s) selected above.** Much much more needs to be done, much faster, to meet the ambitious 2030 carbon-neutrality targets. As far as I'm concerned, carbon offsetting is a bit of a cheat tactic - the emissions still take place! New developments need to be given much stricter rules to build in sustainable materials and reduce emissions and waste. Grey water systems should be mandatory in all new blocks of flats of a certain size (say > 10 units). Other green technologies (air and ground source heat pumps, solar panels, insulation and high performance glazing, also need to be encouraged and made non-optional. Developers will wince as it will eat into their profits but the council and national government need to be firm otherwise those targets are just lip service. The charging infrastructure for electric cars in an absolute joke. Many people on my street are considering replacing their car with an electric one but there are no charging points and houses don't have garages or drives, which means cables would need to be run across the pavement which is unsafe and not accessible. Almost ironically, a few parking meters were just uninstalled but instead of replacing them with charging points (presumably the power supply is already there!) the holes were just covered over. Who makes these decisions? Does no one have any foresight? We need a network of electric charging points in public spaces (car parks, supermarkets) and roads for residents to use - and fast, like this year in 2021! **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** N/A		such as affordable housing. A balance must therefore be struck. However it is recognised that the plan could be amended to address 'non-regulated carbon emissions' and sustainable retrofitting of the existing building stock. The London Plan provides scope for the use of carbon offset payments. The Local Plan seeks to employ these in limited circumstances, recognising there could be feasibility issues which prevent or limit the requirements from being satisfied. However the plan will be amended to make clear offsets should be used as a last resort. The Local Plan will be amended to reflect the London Plan parking standards for Ultra-Low Emission / electric vehicles. However in light of the climate emergency the use Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality.	including for electric or Ultra-Low Emission vehicles.
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** none **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Design to support the circular economy **3. Please provide your comments on the topic(s) selected above.** Farmers' markets are very popular, but please, when designing spaces for these markets leave an element of the "Higgledy-Piggledy" as in Borough Market, at London Bridge. Too much evidence of Architecture or of Planning is a killer, paradoxically. **4. Do you think that there are other approaches that should be considered?** Yes, see above **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?**	0	Noted. Markets or market space will vary depending on location and the nature of use, for example, whether within a town centre or in a car park in an out of centre location, and if farmers' market or other type of market. Design aspects will be considered through the development management process and/or through licencing.	No change.

		N/A			
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Sustainable design **3. Please provide your comments on the topic(s) selected above.** need to build in long term materials that can last for decades. rather than demolishing buildings only after a few decades. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** N/A	1	Noted. This matter is addressed through the Local Plan policy on the circular economy.	No change.
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** 1) encourage energy efficiency of older hard to heat homes by using carbon offset fund and reduce planning permission restrictions for measures such as solid wall insulation and solar pv with battery storage. 2) encourage greater use of cycling by introducing more well designed designated cycle lanes 3) encourage greater take up of electric cars by introducing smart charging points for residential streets . **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Responding to the climate emergency Improving air quality Sustainable design **3. Please provide your comments on the topic(s) selected above.** 1) encourage and promote energy efficiency improvements of older hard to heat homes through use of carbon offset funds for low income residents for measures such as solid wall insulation, solar pv (with battery storage) and heat pumps and reduce planning permission restrictions to allow greater uptake amongst able to pay residents. 2) encourage residents to reduce use of cars by introducing more designated cycle lanes that are designed properly to that they work alongside other vehicular traffic and allow for safe cycle crossings at busy junctions. 3) where residents cannot cycle encourage greater take up of electric cars by introducing smart electric car charging points e.g. subsidised charging points on lamp posts for residents living on streets where not able to park car in drive or outside their house **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** N/A	2	The draft Local Plan policies on sustainable design and construction, including zero carbon development, are considered to be in general conformity with the London Plan. However it is recognised that the plan could be amended to address 'non-regulated carbon emissions' and sustainable retrofitting of the existing building stock. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The Local Plan will be amended to reflect the London Plan parking standards for Ultra-Low Emission / electric vehicles. However in light of the climate emergency the use Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through	Local plan amended to with new policies on 'non-regulated carbon emissions' and sustainable retrofitting of the existing building stock. Local Plan parking policies amended to fully align with London Plan parking standards, including for electric or Ultra-Low Emission vehicles.

				tyre and brake wear and can therefore contribute to poor air quality. The Council's Electric Vehicle Charging Strategy provides further details and will support the implementation of the Local Plan.	
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** Again greater community inclusion would pay dividends, more needs to be included about what people can do locally. **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Design to support the circular economy **3. Please provide your comments on the topic(s) selected above.** The Council need to provide a lead by not demolishing so much but re-purposing **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** N/A	0	The Council's Statement of Community Involvement sets out how local communities will be involved in planning decisions, both in terms of plan-making and planning applications. Should the council bring forward development in the future, the Local Plan policies will apply including those on the circular economy.	No change.
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Responding to the climate emergency Sustainable design **3. Please provide your comments on the topic(s) selected above.** New housing to be energy efficient, use renewable energy (e.g. air source heat pumps) **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** N/A	1	The draft Local Plan policies on sustainable design and construction, including zero carbon development, are considered to be in general conformity with the London Plan. Development proposals will need to apply the London Plan Energy Hierarchy to ensure they are energy efficient and reduce carbon emissions.	No change.
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** Maintain the pavements. **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** Improving air quality Energy infrastructure	1	The Local Plan includes policies dealing with public realm and sets out requirements to secure maintenance arrangements where new development comes forward. Elsewhere, maintenance of the public realm will be dealt with by relevant	Part 3 of the Local Plan amended to include new spatial objectives and policies for the area west of Hither Green station. Local Plan amended to designate Hither Green Lane as a new Local Centre.

		Reducing and managing waste **3. Please provide your comments on the topic(s) selected above.** Hither Green west of the tracks has only 3 car charging points. Lewisham Council decreased the quality of the air in this area by the Lee Green LTN. This cannot happen again. More charging points in this area so our air quality improves. There has been no investment of any sort in Hither Green west of the tracks for years. This needs to change. **4. Do you think that there are other approaches that should be considered?** Deal with the problems already existing. **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** N/A		Council service areas within resources available. The Low Traffic Neighbourhoods project is outside the scope of the Local Plan. Electric vehicles - The Local Plan will be amended to reflect the London Plan parking standards for Ultra-Low Emission / electric vehicles. However in light of the climate emergency the use Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality. The Council's Electric Vehicle Charging Strategy provides further details and will support the implementation of the Local Plan.	Local Plan parking policies amended to fully align with London Plan parking standards, including for electric or Ultra-Low Emission vehicles.
	Sustainable design	**1. Are there other issues around sustainable design and infrastructure that the Local Plan should address?** South circular **2. Do you have any comments on the proposed approaches to sustainable design and infrastructure? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** Thanks to Saddiq Kahn all crappy old vehicle with filthy emissions will be using the south circular from now on, so the center of London will be lovely and clean, with less traffic, and Lewisham will be congested and filthy - what is your plan to combat that?? **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Sustainable Design and Infrastructure' section of the Local Plan?** N/A	0	The Council has and will continue to lobby the Mayor of London / Transport for London to extend the Ultra-Low Emission Zone (ULEZ) past the South Circular and to cover the Borough.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below**	5	Noted. The Low Traffic Neighbourhoods project is outside the scope of the Local Plan.	No change.

		Healthy streets/healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** Love what is happening to the neighbourhood with the LTN, I've been cycling much more with my little boy in the back of my bike and feeling much safer doing so, thank you! No car needed in this family ! **4. Do you think that there are other approaches that should be considered?** Keep it going, the reversal of measures wasn't needed **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** Thank you			
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** There are inadequate south/north bus routes between Lee Green and Greenwich peninsula and Greenwich village **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** Lee Forum carried out a consultation on the adequacy of local bus route, detials of which can be found in the Lee Neighbourhood Plan transport section. Overwhelmingly respondants said there is no easy way to get to Greenwich (east and west). People either have to Blackheath or Lewisham then change. Greenwich is so close to Lee Green it really shouldnt be necessary to change buses, with the delays that that this brings, to get there. As a result many people drive when really it should be a quick bus ride. Two new bus routes would increase active travel. This is particularly important for Lee Green given the amount of housing that is planned for Lee Green and that most of that housing will not be given parking spaces **4. Do you think that there are other approaches that should be considered?** Please plan for bus routes from Lee Green Greenwich Village and Greenwich peninsula **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?**	4	Noted. The Council has and will continue to lobby the Mayor of London / Transport for London for public transport investments locally, including improved bus services within the Borough.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Parking Healthy streets/ healthy neighbourhoods Taxis and private hire vehicles **3. Please provide your comments on the topic(s) selected above.**	8	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies.	No change.

		Bike parking needs to be designed in to transport hubs, shops, and developments so that it is perceived as safe and secure and also open to non-standard bikes (eg trailers, cargo bikes, specially adapted bikes). Everything that can be done to discourage residents from paving over front gardens for car parking - front garden parking effectively blocks their section of road to other people who might want to park; allows residents to avoid parking charges that their neighbours have to pay; has negative environmental consequences for surface runoff and loss of vegetation; and most importantly, causes a danger to pedestrians- who ought to feel safe walking along a pavement **4. Do you think that there are other approaches that should be considered?** Cargo bike / bike trailer hire services, work with taxi firms to encourage people to give up personal vehicles. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** Bike routes need to be carefully planned so that (eg) the strategic route from Lee to Lewisham doesn't go over an unnecessary hill!		The Local Plan has been informed by the Lewisham Cycle Strategy, including the Lewisham Links policies. There are Permitted Development Rights over which the Council exercises no planning control, including the paving over of front gardens.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Public transport is worsening and other infrastructure needs attention **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets/healthy neighbourhoods Parking Deliveries, servicing and construction Sustainable transport and movement **3. Please provide your comments on the topic(s) selected above.** The state of the pavements in many areas is very poor, this is hazardous. How are the council monitoring and addressing this? The cycle and transport provision is not thought through and planned at the same time when planning permission is being considered. This means there isn't a coordinated approach and people end up stranded. New developments are being built with hundreds of bicycle parking spaces, but most people will not feel safe or confident enough to cycle on the road. **4. Do you think that there are other approaches that should be considered?** LTNs are diverting traffic, the evidence that they will signficantly reduce overall car ownership is tenuous. Those living near busy roads are now breathing even worse air, so that the lucky few can enjoy quiet roads. This is not an equitable solution. Dangerous driving seems to be a common theme in resident's concerns, yet the council seem powerless to do anything. Rogue drivers speed without impunity, statistics on accidents are poor quality and don't seem to be monitored or analysed by anyone. This would inform where the most dangerous roads are. The lack of joined up approach better the council, TfL and the policy is uninspiring. How has a Labour council not managed to team up with a Labour mayor and do something better than think up a few LTNs? Surely a missed opportunity. Fining those who leave the motor running or park outside schools? PCNs / traffic wardens outside schools?	2	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including transport infrastructure, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure. The Low Traffic Neighbourhoods project is outside the scope of the Local Plan.	No change.

		5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan? N/A			
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** low traffic neighbourhoods **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets/ healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** Creating low-traffic neighbourhoods that are protected from motorised through-traffic (as proposed by London Living Streets in response to the Council's consultation in November 2018). Increasing the use of non A & B roads for pedestrianised entertainment / retail areas / pocket parks. For example, the immediate vicinity of Brockley station has been temporarily pedestrianised to allow local cafes and restaurants to offer socially-distanced outdoor seating. This has been very successful and should be made permanent. Furthermore it should be considered as a role-model for other similar areas. **4. Do you think that there are other approaches that should be considered?** We note that other London boroughs have made significant progress in these areas over the last 18 months, successfully rebalancing road use away from cars towards cycling, walking and public transport. Proven templates exist that can easily be applied throughout the Borough as well, in particular in Brockley and Ladywell wards, where the traditional residential road grids (in the conservation areas in particular) were designed to support local means of transport. These residential roads were never designed to support rat-running car traffic, which is always to the detriment of all residents along those routes. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	9	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. This includes the application of the Healthy Streets Approach throughout the borough. The Low Traffic Neighbourhoods project is outside the scope of the Local Plan.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Segregated cycle lanes for main roads **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Sustainable transport and movement **3. Please provide your comments on the topic(s) selected above.** I strongly agree with Make Lee Green's response. In particular, the vital importance of making 'main' roads such as the A20 and A2212 safe for cyclists and pedestrians. I support the rollout of LTNs across the borough, but cyclists and pedestrians should not have to take slower, less direct routes on side streets to be safe. Every main road should have segregated cycle lanes and be a safe, pleasant environment for pedestrians. **4. Do you think that there are other approaches that should be considered?**	9	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. This includes the application of the Healthy Streets Approach throughout the borough, particularly on main roads. It may not always be feasible to deliver segregated cycle lanes. Interventions to enable and promote	No change.

		N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A		cycling will be considered on a case-by-case basis, having regard to the Council's Cycling Strategy and Local Implementation Plan. The Low Traffic Neighbourhoods project is outside the scope of the Local Plan.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Sustainable transport and movement Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** On-street car parking must be reduced. Currently, all residential streets are blocked with parked cars. Often they are parked halfway up on the sidewalk restricting pedestrians. They also block bus services significantly. They increase the danger to cyclists by careless drivers opening the car door or the cyclist being squeezed in between parked car and moving traffic. The plan should contain - A ban on all on-street parking along bus routes - Restricted on-street parking in all residential areas, not just those with good public transport access. Most residential areas are within 10mins cycle distance from public transport access which, of course, requires plentiful bicycle parking spaces. - Disability parking must be provided in sufficient numbers everywhere and is exempt from above. - All remaining car traffic including vans must be electric or hydrogen driven with a sufficient provision of charging points throughout the borough. - Turn residential streets into one-way access to reduce rat-runs or with agreement of the residents, close some completely to traffic. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	3	The Local Plan will be amended to fully align with the London Plan parking standards, which provide more stringent requirements for car-free and car-light development to reduce car use and promote modal shift. The Local Plan will also be amended to reflect London Plan parking standards for Ultra-Low Emission / electric vehicles. However in light of the climate emergency the use Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality. The Council's Electric Vehicle Charging Strategy provides further details and will support the implementation of the Local Plan.	Local Plan parking policies amended to fully align with London Plan parking standards, including for electric or Ultra-Low Emission vehicles.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Lee Green LTN **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below**	1	The Low Traffic Neighbourhoods project is outside the scope of the Local Plan. The Council has and will continue to lobby the Mayor of London / Transport for London to extend the	No change.

		Sustainable transport and movement **Healthy streets / healthy neighbourhoods** **3. Please provide your comments on the topic(s) selected above.** Lee Green LTN caused abject misery and horrific traffic and pollution in Hither Green west of the railway. Do not bring it back. It does not reduce traffic it moves it. **4. Do you think that there are other approaches that should be considered?** ULEZ throughout Lewisham. If people want to live in LTN's then they should be made to give up their cars, car leases and car clubs. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A		Ultra-Low Emission Zone (ULEZ) past the South Circular and to cover the Borough.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** More LTNs **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** **Healthy streets / healthy neighbourhoods** **3. Please provide your comments on the topic(s) selected above.** The LTN has transformed the Lee Green area but more needs to be done and faster so that benefits are felt more widely. I would like to see the council address air pollution on main roads and also provide more cycling infrastructure ie segregated lanes. As a mum, I don't feel comfortable on busy roads especially with kids but that could change quickly if safety concerns were addressed. I would like to see bolder commitments from the council in addressing the climate crisis. I believe Lewisham is currently ranked the worst of all inner London boroughs on the Healthy Streets scorecard. I also feel council comms could be so much better when we talk about discouraging car use. No one is talking about the many health benefits for example. More ltns across lewisham, safer, quieter and cleaner roads needed. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	11	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. This includes the application of the Healthy Streets Approach throughout the borough, particularly on main roads. The Low Traffic Neighbourhoods project is outside the scope of the Local Plan.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.**	10	Support noted.	No change.

		welcome the proposals to increase active travel. this should be done in conjunction with housing. it is not sustainable to use a 1970's model of design with the density of population from the new housing. Active travel benefits all communities and has additional positive outcomes for health, well-being and community cohesion, so should be a priority. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** No			
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Electric Vehicle charging infrastructure is not explained, how can wider goals such as carbon net zero be implemented without a clear EV strategy. **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** To make Healthy Neighbourhoods a reality, a defined walking network needs to be developed including a 15 minute neighbourhood to define key walking routes. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	12	The Local Plan will also be amended to reflect London Plan parking standards for Ultra-Low Emission / electric vehicles. However in light of the climate emergency the use Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality. The Council's Electric Vehicle Charging Strategy provides further details and will support the implementation of the Local Plan. The spatial strategy broadly supports the 15 minutes neighbourhood concept, however additional supporting text will be included for clarification. The Local Plan includes the Lewisham Links policy, which helps to define a strategic network of walking routes and cycleways. Additional public realm enhancements and investments will be considered on a case-by-case basis having regard to the Council's Cycling Strategy and Local Implementation Plan.	Local Plan parking policies amended to fully align with London Plan parking standards, including for electric or Ultra-Low Emission vehicles. Local Plan spatial strategy supporting text amended to make reference to 15 minute neighbourhood concept.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A	16	Support noted.	No change.

		2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below Sustainable transport and movement Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** Very much support the Healthy Streets/ healthy neighbourhoods & sustainable transports initiatives; though probably all needs to happen at a much faster rate! Some people do need to use cars (disabled, public sector roles starting early in the morning before public transport does etc.) but the vast majority of journeys could happen by foot, cycling or public transport (more heavily subsidised for those that it needs it needs to be). We urgently need to reduce pollution, reduce congestion, increase the number of safe cycle lanes, widen pedestrian routes (e.g. by no longer allowing vehicles to park on some pavements), & make our streets more pleasant & safer. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A			
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** If the housing needs are to be met, the increase in population cannot mean a corresponding increase in the number of vehicles. Increasing the number of LTNs to encourage sustainable active transport options will support local businesses, increase local economic activity, improve health and well-being of residents. The studies into the introductions of LTNs both in other boroughs of London and internationally show that the benefits of LTNS accrue to people living outside the area as well. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	13	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The Low Traffic Neighbourhoods project is outside the scope of the Local Plan.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Parking. The whole of Lee needs a CPZ **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** **Healthy streets / healthy neighbourhoods**	15	The making of Controlled Parking Zones is outside the scope of the Local Plan. The Part 2 policies deal with approaches to parking management. The Local Plan will be amended to fully align with the London Plan parking standards, which provide more stringent requirements for car-free and car-light development to	Local Plan parking policies amended to fully align with London Plan parking standards, including for car-free and car-lite development.

		3. Please provide your comments on the topic(s) selected above. The LTN has revitalized the area. Please keep that focus to help encourage healthy walking and cycling. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A		reduce car use and promote modal shift. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. This includes the application of the Healthy Streets Approach throughout the borough, particularly on main roads. The Low Traffic Neighbourhoods project is outside the scope of the Local Plan.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods Sustainable transport and movement Parking **3. Please provide your comments on the topic(s) selected above.** Make Lee Green is a residents' group that supports measures to improve the health and quality of life of people in the Lee Green area and across Lewisham. We appreciate the opportunity to provide comments on the Lewisham Plan. The Plan identifies the right priorities for the borough. We fully support its aims of achieving safer, healthier, more inclusive and more sustainable communities. However we find there is a mismatch between the aims of the plan and the detail of the proposals and it lacks specific actions or targets that will enable the goals to be realised **4. Do you think that there are other approaches that should be considered?** Make Lee Green's proposal to improve the plan are are avialable here (and have alos been submitted by email): https://drive.google.com/file/d/1hZtCl3zgurAwznSfo_5qV7xukZzRg9m4/view **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	13	Noted. The Council has received Make Lee Green's full representations by email. Responses to these comments are set out in the Written Representations Table that sits as an Appendix to this Regulation 18 Consultation Statement.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A	15	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of	No change.

		2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** We need a borough-wide approach to healthy streets and low traffic neighbourhoods, more provision for safe cycling and better connectivity for cycling, walking and public transport **4. Do you think that there are other approaches that should be considered?** I support the proposal set out in the Make Lee Green submission https://makeleegreen.wordpress.com/2021/04/09/our-response-to-the-lewisham-local-plan-consultation/amp/#click=https://t.co/Dx8cTNCjoj **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A		sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. This includes the Healthy Streets Approach. The Approach will be applied borough-wide to all streets, however the Local Plan signposts key major roads and corridors where the approach is particularly important to support the delivery of the spatial strategy. The Council has received Make Lee Green's full representations by email. Support for this is noted. Responses to these comments are set out in the Written Representations Table that sits as an Appendix to this Regulation 18 Consultation Statement.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Providing clear design requirements for developers to contribute CIL towards the construction of a high quality Strategic Protected Cycle Network throughout the borough. **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** **Sustainable transport and movement** **Bakerloo line extension** **Healthy streets / Healthy neighbourhoods** **Deliveries, servicing and construction** **3. Please provide your comments on the topic(s) selected above.** Lewisham Cyclists (LC) are the local borough group of the London Cycling Campaign (LCC) with more than 2500 supporters of whom over 700 are fully paid-up members of LCC. We speak up on behalf of everyone who cycles or wants to cycle in the London Borough of Lewisham and its adjacent local parks; and we speak up for a greener, healthier, happier and better-connected capital. General comments on the plan: Lewisham Cyclists welcome the opportunity to comment on the Lewisham Local plan. The focus of our response is around the Transport and Connectivity section of the plan, along with some specific comments regarding certain sites throughout the borough. We would also highlight our current campaigning objectives which align with a number of the proposals in the plan and would urge the council to integrate these into the local plan.	53	CIL is a levy on all development over certain parameters and its rate is set out on the Councils website. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan We note your support to the various policies.	No change.

		Our comments about the overall plan can be found below, along with specific detailed comments on a number of individual sites in the Appendix provided. We do have a number of comments and concerns as detailed below: Specific points about the overall plan We believe some of the wording in the plan should be revised to bring it in line with existing policies from City Hall, where walking and cycling should be “enabled” as opposed to “encouraged”. Lewisham council has been encouraging and promoting cycling for more than a decade, yet still has one of the lowest mode shares for cycling amongst all inner london boroughs, and the worst Healthy Streets Score of any Inner London borough. The key missing element to date has been dedicated infrastructure, creating a fully integrated cycle network which meets London Cycle Design Standards and enables all residents in the borough to choose cycling as a viable mode of transport. We fully support the Council’s visionary aims of becoming carbon neutral by 2030, and for 80% of all trips to be made by walking, cycling or public transport by 2041 (London Plan Policy T1). However, it should be noted that the Healthy Streets low scores attributed to the lack of safe cycle tracks, the amount of road space not managed under CPZ, and the low participation figures of cycling, the damage to health due to pollution hotspots, reveal that time to effect lasting and sustainable change is very limited. We also note the outline strategic cycle network (figure 12.4) doesn’t use current nomenclature for cycleways, instead mentioning the now defunct quietways and cycle superhighways. This figure also shows incorrect routing for the A21 Lewisham Spine which should follow the A21 and A20 as far as Jerrard Street before heading North up Brookmill road. This should be amended along with the terminology used to comply with the Transport for London Cycling Action Plan. Whilst we support the aims of the strategic cycle network mentioned, we would expect this network to now be built to a standard which follows London Cycle Design Standards. It should be noted that Lewisham council has yet to build any protected cycle track of considerable length within the last 5 years. The protected cycle track on Edward street in Deptford is to our knowledge, the only protected space (on a road) in the entire Borough that meets current design standards and was provided as part of Quietway 1 funded through TfL 5 years ago. It is approximately 250m. We would urge the planning department in the council to work more closely with highways in addressing a number of issues throughout the borough which have severed communities for decades and created pinch points, all of which should be addressed in any strategic planning documents for development on a number of adjacent sites. We provide some examples of this further below, although not an exhaustive list. Lewisham Cyclists would urge the council to update the existing borough cycle strategy and transport strategy to meet updated guidance and design principles as detailed in Transport for London’s Cycling Action Plan. We also support Policy TR3 and the aim of providing Health Neighbourhoods (HN). Again, there is a significant gap between what has been provided so far (1) and the need which we estimate to be over 100. Similarly, very few modal traffic filters have been installed in the Borough. Pre-pandemic it was one (Prince Street, Deptford) which represents the total number of filters (bollards/planters) installed in the last quarter century. During the first phase of the pandemic other emergency filters were installed but half have since been removed or in abeyance. We believe the council needs to show more political will and coherent commitment in delivering on its own strategy. Although the plan states (page 457) that developers will be expected to submit details of how their proposals will facilitate walking and cycling to and from their site(s), with a Healthy Streets approach, we consider this too discretionary to have a significant impact. In our			

		experience developers simply focus on cycle parking facilities, rather than investing in improved connectivity to and from the site to other destinations. Therefore the plan should stipulate that adopting the Healthy streets approach will be a condition of planning with all new developments required to demonstrate an improvement in the healthy streets score for adjacent streets to development sites. Our view is the Council should take the lead in stipulating strategic active travel corridors, which the site specific developer would be required to link up with. We are hopeful this will happen with the A21 Healthy Streets Corridor (Lewisham Spine) as envisioned. Unless a strategic cycle and active travel network is specifically pursued by the Council, as previously mentioned in the Council's own Transport Strategy, it is unlikely that developers will single handedly secure that crucial piece of sustainable travel infrastructure. In terms of investment, S106/CIL contributions should be ring fenced for enabling active travel to/from areas of development. On page 460 - last mile delivery we support this although we'd like to see the Council supporting e-cargo bike delivery companies as well as encouraging mutual storage and warehousing facilities at strategic points such as to provide delivery hubs for both Lewisham and Catford Town Centres. Sites such as Holbeach Road Car Park and Molesworth Street Car Park would provide ideal locations to facilitate this. Bakerloo Line Extension - we're supportive of the extension (as mentioned at consultation) but consider cycle hubs are needed at strategic interchanges, especially New Cross, Lewisham, and Catford. Secure cycle parking is essential to promote onward public transport access and avoid the current car park dominated areas outside stations. We believe this should be provided as part of S106 agreements for all development within 100 metres of a station entrance. Car parking, legal pavement parking should be banned for all new development, with controlled parking zones for existing residents implemented as conditions of any planning agreements. Lewisham's Cycling Strategy (2017) itself informs much of the Transport and Connectivity section, which is welcomed. However, it is important to note that the last known review of this (https://councilmeetings.lewisham.gov.uk/ieListDocuments.aspx?CId=136&MId=5566) reflected the significant challenge of targets already set , most of which were under-achieved at this review, and remain so eighteen months later. Ambitious targets of doubling the number of cycling journeys; increasing the proportion of people cycling to work to 10%; halving casualty rates of cyclists; and increasing the proportion of children cycling to school to 50% remain, and the gap towards closing in on those laudable metrics is as challenging as ever. Out of the 21 "quick win" cycle contra-flows identified, only 3 have been implemented in the period since the review. More positively Lewisham has made progress with school streets but there are many more significant and structural interventions required before Lewisham becomes an active travel exemplar. Securing these will require a more joined-up strategic approach where the Borough can apply an organisation wide culture of thinking beyond the car, amongst all its officers and members. Despite our obvious reservations on the scale of the challenge ahead, we remain committed to supporting Lewisham where there is commitment to real and lasting change. Anecdotally the number of people cycling, and crucially the number of people who would cycle if it was safe, have grown during the pandemic. Despite the hardships and tragedies of the past year, most of us have significantly changed our behaviour in our daily lives. We want a new normal which enables more people to walk and cycle in a safe and pleasant surrounding that is good			

		for health, and people's social and mental well being. It will also make them happier and benefit the local economy and cultural life of the Borough 4. **Do you think that there are other approaches that should be considered?** **N/A** 5. **Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** Detailed in our full response to the local plan here. https://bit.ly/3t7ADP6			
	Transport and connectivity	1. **Are there other issues around transport and connectivity that the Local Plan should address?** Please don't ignore the A205 Stansted Road parade of shops (nos 294-341) which is a real trouble spot and totally NEGLECTED. There is high pollution due to bad traffic on A205. Traffic flow must be improved. Please don't ignore us just before we sit on the border between two wards, we are always forgotten! 2. **Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** None chosen 3. **Please provide your comments on the topic(s) selected above.** Please don't ignore the A205 Stansted Road parade of shops (nos 294-341) which is a real trouble spot and totally NEGLECTED. There is high pollution due to bad traffic on A205. Traffic flow must be improved. Please don't ignore us just before we sit on the border between two wards, we are always forgotten! 4. **Do you think that there are other approaches that should be considered?** Please don't ignore the A205 Stansted Road parade of shops (nos 294-341) which is a real trouble spot and totally NEGLECTED. There is high pollution due to bad traffic on A205. Traffic flow must be improved. Please don't ignore us just before we sit on the border between two wards, we are always forgotten 5. **Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** Please don't ignore the A205 Stansted Road parade of shops (nos 294-341) which is a real trouble spot and totally NEGLECTED. There is high pollution due to bad traffic on A205. Traffic flow must be improved. Please don't ignore us just before we sit on the border between two wards, we are always forgotten!	0	Noted. The Local Plan includes policies which seek to deliver and support public realm enhancements and area improvements along the South Circular, using the Healthy Streets Approach. The plan also includes policies to manage uses within parades to help secure their long-term vitality and viability. Further details are set out in the Part 2 section on economy and culture.	No change.
	Transport and connectivity	1. **Are there other issues around transport and connectivity that the Local Plan should address?** N/A 2. **Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Sustainable transport and movement	12	The Local Plan will also be amended to reflect London Plan parking standards for Ultra-Low Emission / electric vehicles. However in light of the climate emergency the use Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions	Local Plan parking policies amended to fully align with London Plan parking standards, including for electric or Ultra-Low Emission vehicles.

		3. Please provide your comments on the topic(s) selected above. I am keen that walking and cycling are given priority, but given that there will still be car use I would like to see proposals for a network of charging points to facilitate use of electric cars. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A		they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality. The Council's Electric Vehicle Charging Strategy provides further details and will support the implementation of the Local Plan.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** CPZ **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Parking **3. Please provide your comments on the topic(s) selected above.** There are so many people that commute from outer/outside London that park in Lewisham's streets, especially around stations. They then finish their journey on public transport. This means that there is more traffic in Lewisham borough using residential streets, **4. Do you think that there are other approaches that should be considered?** There should be CPZ in the borough which is provided free to residents. Maybe charge non residents in some restricted areas to create revenue for the council **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	5	The making of Controlled Parking Zones is outside the scope of the Local Plan. The Part 2 policies deal with approaches to parking management. The Local Plan will be amended to fully align with the London Plan parking standards, which provide more stringent requirements for car-free and car-light development to reduce car use and promote modal shift.	Local Plan parking policies amended to fully align with London Plan parking standards.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Sustainable transport Healthy streets / healthy neighbourhoods Parking Bakerloo line extension **3. Please provide your comments on the topic(s) selected above.** Good to hear about plans for more healthy streets. Most people do not own cars, and air quality in the borough is poor. We need more public transport options (including tube connections), more pleasant walking and cycling routes (more trees, less traffic), and new development that isn't done in the same old 1960s-style car-centric way (why devote scarce land to more and more parking spaces?). **4. Do you think that there are other approaches that should be considered?** N/A	20	Support noted. The Low Traffic Neighbourhoods Project is outside the scope of the Local Plan.	No change.

		5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan? I'm in favour of the general aims - this is a good start that shouldn't be undone by the car lobby (as we saw with modest plans for low-traffic neighbourhoods)			
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Focus and priority should be on cycling and walking not continuing with the status quo and promoting car use **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Sustainable transport and movement Healthy streets / healthy neighbourhoods Parking **3. Please provide your comments on the topic(s) selected above.** MORE FOCUS ON CYCLING! - make it MUCH easier and more accessible, not just for leisure but for commuters as a serious alternative to driving. At present alot of cycle routes are just tagged onto pavements or mixed use pathways with pedestrians and these routes are not particularly cycle friendly (cycle barriers, dismount signs, pedestrian crossings and islands, narrow paths). To reach 80% sustainable transport, we need wide dedicated cycle routes that are safe and well maintained (and designed and planned by actual cyclists!). No cycling detours or hilly routes - people need real direct and easy routes to get to shops and places of work **4. Do you think that there are other approaches that should be considered?** Cycle only major roads and routes that are direct, uninterrupted and segregated from cars/vehicles. Ban/remove/reduce all vehicle parking (apart from loading/disabled parking) on all high streets and main roads and put in segregated cycle routes instead and more pedestrianized areas. More electric vehicle charging points - Ensure local delivery vehicles and business move to electric vehicles - particularly large supermaket chains and the council itself - too many diesel vans and trucks driving around the parks **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	16	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The Lewisham Links policy provides the basis for a connected network of high quality walking and cycling routes. This will be supplemented with public realm enhancements throughout the borough as new developments come forward, in line with Policy QD3 on public realm and TR3 Healthy Streets as part of Healthy Neighbourhoods. It may not always be feasible to deliver segregated cycle lanes. Interventions to enable and promote cycling will be considered on a case-by-case basis, having regard to the Council's Cycling Strategy and Local Implementation Plan. The Local Plan will also be amended to reflect London Plan parking standards for Ultra-Low Emission / electric vehicles. However in light of the climate emergency the use Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality. The Council's Electric Vehicle Charging Strategy provides further details and	Local Plan parking policies amended to fully align with London Plan parking standards, including for commercial parking and Ultra Low Emissions vehicles.

				will support the implementation of the Local Plan.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Lewisham's commitment to encouraging pedestrian access and plan to "carefully manage the amount of car parking" is welcome. The most glaring and obvious issue in the borough is the designation of parking spaces on pavements/footpaths. **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods Parking **3. Please provide your comments on the topic(s) selected above.** Healthy Neighbourhoods and LTNs are encouraging developments and the Lee Green LTN also gave a welcome respite to Ennersdale Road (which had previously been a dangerous rat-run). Unfortunately the part-reversal of the scheme has led to a return of speeding traffic. However, the new plans for school streets in the area are, again, very welcome. The current council have received a massive mandate for radical pledges on green transport and the climate crisis. The council needs to push ahead with plans for LTNs, expand them across the borough. Healthy streets are the future. Across the Borough cars are encouraged to park with two wheels on the pavement (e.g. Ennersdale Road, Leahurst Road) and even to park completely on the pavement (Bellingham Estate). If the Council is really committed to encouraging pedestrian access this abomination must end. I live on Ennersdale Road, where parking spaces take up 50% of the pavement leaving pedestrians with no other option but to walk in single file. On bin collections days, sections of the pavement are often completely impassible to pedestrians. This has been a real problem during the pandemic, when pedestrians trying to social distance were forced to walk on the road (as a busy rat-run this was very dangerous). This system is clearly a legacy of car-centred planning of the 1960s and must be remedied by the 2021 plan. If a street does not have the capacity for two-way traffic and parking on both sides then it must either a) become one-way to traffic or b) have double-yellow lines on one side. Pedestrians and the 55% of Lewisham households without a private vehicle should not pay the price for the decisions of private vehicle owners. **4. Do you think that there are other approaches that should be considered?** Abolish all parking spaces which partly or fully occupy pavement/footpath space. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** If Lewisham really wishes to transfer space from private vehicles to pedestrians, abolishing all pavement parking in the Borough is the place to begin.	19	Support noted. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The Local Plan will be amended to fully align with the London Plan parking standards, which provide more stringent requirements for car-free and car-light development to reduce car use and promote modal shift. A carefully managed approach to car parking provision, including the use of existing parking spaces, will need to be taken. This is recognising that some areas do not benefit from good levels of access to public transport. Further details on the strategic approach to parking are set out in Part 2 policies on Parking. The Low Traffic Neighbourhoods project is outside the scope of the Local Plan.	Local Plan parking policies amended to fully align with London Plan parking standards, including car-free and car-lite development.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Not everyone can travel by by cycle or walk. Car Access to streets is essential for the vunrable ,delivery's, taxis , disabled, emergency services .	0	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are	Local Plan parking policies amended to fully align with London Plan parking standards.

		2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** This makes streets and areas closed to through traffic a muggers paradise. Also causes more pollution because longer journeys are required to navigate around them. Plus the main roads for the diverted traffic will be full of idling cars creating more pollution **4. Do you think that there are other approaches that should be considered?** Yes why not encourage electric cars and vans .add more electric charging points. Maybe put width restrictions on side streets instead of closing then to traffic **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** The sad thing is all this money being spent on cycle lanes yet many still choose to ride on the pavement or through red lights. A danger to both road users abs pedestrians		central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. A carefully managed approach to car parking provision, including the use of existing parking spaces, will need to be taken. This is recognising that some areas do not benefit from good levels of access to public transport. Further details on the strategic approach to parking are set out in Part 2 policies on Parking. The Local Plan will also be amended to reflect London Plan parking standards for Ultra-Low Emission / electric vehicles. However in light of the climate emergency the use Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality. The Council's Electric Vehicle Charging Strategy provides further details and will support the implementation of the Local Plan.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** A holistic approach to connectivity is needed. most important though is to offer options that encourage people to undertake active travel. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	7	The spatial strategy sets out the overall approach to integrated land-use planning within the borough. The plan seeks to direct growth and development to areas that are well connected by public transport and/or where new strategic transport infrastructure is planned to be delivered. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions	No change.

				and policies and are set out clearly in Part 2 Transport policies.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** you are cutting off vital access to Lewisham Hospital with the road closures and road narrowing **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** How anyone thought it would be a good idea to funnel all traffic into a single lane on the approach to a main university hospital with a vital trauma and A&E unit is completely beyond me. All emergency vehicles are now caught in a long line of traffic which cannot move out of the way because of the bollards segregating the seldom used cycle lane. When will councils understand that making it difficult for cars to move around also affects emergency services? It doesn't remove the traffic from the roads it just causes standstill traffic jams which in turn cause a spike in pollution levels - the thing that you are apparently trying to reduce. **4. Do you think that there are other approaches that should be considered?** Stop ignoring the needs of the elderly and disabled. Forcing cycle use discriminates against all those for whom mobility is an issue. Cutting off access to roads also impacts these vulnerable groups because their carers, district nurses, paramedics etc all then have issues when doing visits etc **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** Better public transport would go some way to helping the situation but if TFL are abandoning the tube extension, and the local bus routes continue to be so separated what alternative do people with mobility issues have other than to use veicles to get to hospital appointments, go shopping etc etc	1	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes, and reducing car use, are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The Council has and will continue to lobby the Mayor of London / Transport for London for improvements to public transport services. It is acknowledged that older people and those with mobility issues will have specific requirements. The Local Plan car parking standards ensure that an appropriate level of provision is made for disabled parking bays. Where highways or public realm works are proposed, the Council will consult with the relevant transport authorities, including Transport for London.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** To be honest, this is all quite small scale on a screen and really very difficult to understand what is going on. The idea of healthy neighbourhoods and streets sounds great, but if you have some parking and not enough for everyone, who gets the parking? Not sure you even share it as it is. All our streets with their ruined views now have to pay to park because of the knock on effect of the terrible towers. **4. Do you think that there are other approaches that should be considered?**	3	Comments on legibility and presentation of consultation materials noted. We will consider feedback to inform approaches on future consultations. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes, and reducing car use, are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies.	Local Plan amended to provide more support for cycle hire use.

		What are you planning for electric bikes and possible scooters? They are silent, race through parks (scooters not bikes to be fair). Apparently illegal. They seem a good alternative transport to cars, so planning should consider these. You don't want busy cycle routes to have to share with electric bikes and scooters. We know this is problematic in the Netherlands. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** I go back to try to read the information and think about your key approaches and I am again overwhelmed by the amount of text. Can't you get someone to re write this consultation simply. Just say what it is, not all the filler.		Car parking provision will need to be carefully managed to meet the London Plan objectives for modal shift. Where car parking is required the priority is for disabled parking bays. The Council may use Controlled Parking Zones to manage parking pressure within neighbourhoods however the making of CPZs is outside the scope of the local plan. The use of electric scooters (e-scooters) is covered separately by legislation, which is outside the scope of the Local Plan. Transport for London has issued guidance on the use of el-scooters which should be referred for further information. In general, rental e-scooters are the only way to legally ride an e-scooter on public roads or in other public places within London - and even this is limited to specific boroughs. It is still illegal to use privately-owned e-scooters or other powered transporters on public roads. The use of electric or hybrid bicycles is broadly supported to encourage modal shift – this is provided that a bike meets the Electrically Assisted Pedal Cycles (EPAC) requirements, in which case it is classed as a normal pedal bike. This means you can ride it on cycle paths and anywhere else pedal bikes are allowed. However it is acknowledged that the Local Plan can provide more support for cycle hire.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Sustainable transport and movement Healthy streets / healthy neighbourhoods Deliveries, servicing and construction **3. Please provide your comments on the topic(s) selected above.**	13	Support noted. The spatial strategy sets out the overall approach to integrated land-use planning within the borough. The plan seeks to direct growth and development to areas that are well connected by public transport and/or where new strategic transport infrastructure is planned to be delivered.	Local plan amended to provide more authoritative language where appropriate (e.g. development proposals 'must' rather than 'will be expected to' or 'should'). The Local Plan has been amended to acknowledge that issues around the use of Low Emission Vehicles (e.g. carbon in production, pollution from tyre wear, etc.) and that a carefully managed approach to their use is therefore required.

		Strongly support the target of 90% of all journeys to be by active travel or public transport by 2041. There needs to be more detail as to how residents will be supported in meeting this target. Needs to be more detail of the standards that developers MUST meet with regards to healthy streets assessments AND the consequences of these NOT being met. There needs to be stronger language and more concrete intentions in a holistic and strategic approach to borough-wide sustainable transport and reducing dependence on the car. A move to Electric Vehicles is only a very partial solution - and the health problems of PM2.5 particulates from ALL vehicles (whether EV or not) needs to be addressed (more monitoring sites of the extremely hazardous PM2.5 are required). Supporting "last mile" delivery hubs is a great idea. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A		The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The Local Plan has been amended to acknowledge that issues around the use of Low Emission Vehicles, and that a carefully managed approach to their use is therefore required.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods Bakerloo line extension Sustainable transport and movement Safe pavements **3. Please provide your comments on the topic(s) selected above.** Forcing all/most traffic on to main roads literally costs lives both in terms of pollution and traffic accidents, why is the health of people living traffic heavy roads less valuable than those on residential streets? Pedestrian footfall is greater along main roads than residential streets and many schools are located alongside them. Creating more LTNs simply will create gridlock on main roads and expose both residents, school age children and other road users to ever higher levels of pollution. **4. Do you think that there are other approaches that should be considered?** Charging drivers (and I am a driver) for road usage, extension of the Bakerloo line along the Hayes line as originally proposed. Schemes to support use/uptake of electric vehicles, including enabling home owners to be able to park close to their charging points, electrification of buses in LBL area. Tackling cycling on pavements, registration scheme for cyclists to prevent traffic infringements i.e. failing to stop at red lights, posing harm to pedestrians, removing motorised scooters etc. FROMm pavements **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** **N/A**	2	The Low Traffic Neighbourhoods project is outside the scope of the Local Plan. The setting of levies or charges for road use is outside the scope of the Local Plan. The Local Plan will also be amended to reflect London Plan parking standards for Ultra-Low Emission / electric vehicles. However in light of the climate emergency the use Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality. The Council's Electric Vehicle Charging Strategy provides further details and will support the implementation of the Local Plan.	The Local Plan has been amended to acknowledge that issues around the use of Low Emission Vehicles (e.g. carbon in production, pollution from tyre wear, etc.) and that a carefully managed approach to their use is therefore required.

	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Noise pollution from cars / motorbikes / ATVs **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** Living close to a relatively busy route from the South Circular towards Brockley / New Cross there is a large amount of traffic, while the ULEZ will seek to change the exhaust pollution nothing is being done to address the level of noise pollution. Significantly the engine volumes and behaviour of drivers moving off from pedestrian lights and others simply delighting in exceeding the speed limits and demonstrating the power of their engines with great noise. More needs to be done to consider residents and discourage drivers from behaving in such inconsiderate ways. **4. Do you think that there are other approaches that should be considered?** Noise pollution monitoring, fines for un-muffled engines, banning of ATVs on city roads, rumble strips to make it uncomfortable to travel at speed along key roads (not ramps as I believe they cause more stop / start acceleration than they prevent). **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	9	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. This includes adoption of the Healthy Streets Approach particularly along major roads including the South Circular, which covers matters of amenity such as noise.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Black Taxis are public transport and should be considered as such and included when making plans for future transport needs. Stop excluding them **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** Black Taxis are public transport and should be considered as such and included when making plans for future transport needs. Stop excluding them **4. Do you think that there are other approaches that should be considered?** Black Taxis are public transport and should be considered as such and included when making plans for future transport needs. Stop excluding them **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** Black Taxis are public transport and should be considered as such and included when making plans for future transport needs. Stop excluding them	2	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes, and reducing car use, are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The draft Local Plan policy TR6 recognises that taxis and private hire vehicles do play a role in meeting the transport needs of Londoners. It includes a policy on development proposals involving taxi hire businesses to ensure these uses are appropriately managed.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Noise and vibration impact of rail on environment and human habitat	0	Noted. The timetabling and scheduling of trains is outside the scope of the Local Plan.	No change.

		2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below Sustainable transport and movement **3. Please provide your comments on the topic(s) selected above.** The move from private cars to public transport in understandable, but there is apparently no concern about the adverse impact that rail itself can have. For example, since the refurbishment of London Bridge station there has been a huge increase in non-stopping fast trains through Brockley, Forest Hill, Sydenham etc. For housing near the railway, this has made a distressing change to quality of life, affecting sleep and general health. There needs to be consideration of sound baffling, also sped limits through built-up areas. Where the track is set apart in a cutting, the impact is not a problem, but where the track is at normal ground/street level near housing, the impact is serious and needs consideration. Currently no agency or government department is taking responsibility, although the Environmental Health Officer is supposed to have an overall duty of care. **4. Do you think that there are other approaches that should be considered?** It is implementation rather than approach. The impact of rail needs attention. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** Many busy stations have not benefited from the weekend late-running of the London Overground. Trains should run the full route out to Crystal Palace and Croydon, not terminate at New Cross Gate.			
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should addresses** No it is unfair to people that use taxis **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Taxis and private hire vehicles **3. Please provide your comments on the topic(s) selected above.** Licensed taxis should have access to all roads. **4. Do you think that there are other approaches that should be considered?** Licensed taxis should be able to travel in London anywhere without having to get special permission from any borough. They should be able to get their passengers anywhere they need to get to without fear of a fine Absolutely ridiculous to suggest they need special permission to travel on an individual borough **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** Leave it as it. Is our roads are there for everyone not just cyclists	1	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes, and reducing car use, are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The draft Local Plan policy TR6 recognises that taxis and private hire vehicles do play a role in meeting the transport needs of Londoners. It includes a policy on development proposals involving taxi hire businesses to ensure these uses are appropriately managed.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Better bus services; transport issues for essential car users; problems caused for some residents of existing barriers, continuing through traffic pushed onto major roads.	1	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of	No change.

		2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below Sustainable transport and movement Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** I strongly support reducing pollution and healthier neighbourhoods and communities. However, Lewisham's current policies and future proposals do not consider all of the borough's residents with equal fairness or thought, and are effectively biased in favour of a specific approach which works well for some residents in some areas but which is in practice damaging for other residents in other areas. So, the elderly (but not necessarily the disabled), people who have to use cars either for work or for a positive and healthy lifestyle, people who live or have businesses on the horribly congested and crowded through routes, and people whose movements are restricted by the ongoing changes are effectively ignored in that no real attempt is made to avoid the damage caused to their lives and livelihoods. **4. Do you think that there are other approaches that should be considered?** 1/ A proper consultation; that is, one that is not skewed towards support for or acceptance of the council's way of approaching this issue. This should be open and include a survey of existing residents about the effects of changes so far. It should also include the urgent publication of the complaints received so far. This could result in a referendum on key issues. It should definitely involve reviewing the existing and potential future impact on emergency service access 2/ A realistic attempt to improve existing public transport provision before further restrictions to car travel are applied; this should initially be targetted at urgent improvement of the local bus services. 3/ Revisiting and reconsidering less radical (and disruptive) measures such as one ways systems, traffic calming, better pavements and street lighting, improved cycle routes, more timed restrictions or heavy goods use restrictions etc..... In many instances these were not tried properly before road closures were imposed **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A		sustainable transport modes, and reducing car use, are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. It is recognised that the delivery of modal shift may be more challenging in areas which currently do not benefit from good levels of public transport. The council has and will continue to lobby central Government and the Mayor of London / Transport for London for investment in public transport infrastructure and improvements, including bus services. The parking policies recognise and respond to the need for parking provision for disabled parking bays. The Local Plan is supported by an Integrated Impact Assessment, which includes an Equalities Impact Assessment. This has informed the preparation of the plan. The Local Plan consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Bakerloo line extension Sustainable transport and movement **3. Please provide your comments on the topic(s) selected above.** I am glad that the Bakerloo extension has been kicked into the long grass since the over inflated numbers of houses in a borough already very densely populated in parts to be built will have to be re evaluated . I think Lewisham should put pressure on TFL to increase the number of buses at peak hours are always full / would encourage the use of buses rather than cars.I refer to the 363 bus	0	The London Plan commits to the delivery of the Bakerloo line extension, however at this time the project has not yet been fully funded. The delivery of the Local Plan is not contingent on the BLE, however it does seek to secure its future delivery. The council has and will continue to lobby central Government and the Mayor of London / Transport for London for investment in public transport infrastructure and improvements, including bus services.	No change.

		route..the buses to and fro at peak times are always full of children.. .The service is infrequent not hitting the time table and should be increased. The 356 bus has 2 buses at peak hours ! yet covers a route with steep hills, unsuitable for the average person to consider cycling along esepcially with kids/ shopping. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A			
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** The policies outlined in the plan are generally designed to make transport and movement more efficient, agreeable and sustainable. This is certainly essential, but there is another approach - reducing the need and demand for transport - that I mention below. **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** This is a core requirement. The overwhelming priority given to the movement of traffic and the parking of vehicles means that our streets can hardly fulfill other vital functions as admirably and clearly shown by the healthy street wheel. They should be places for exercise and meeting with plenty of greenery and habitat to boost human health and mitigate biodiversity loss and climate change, but instead are lined by parked vehicles and largely reserved for lethal and polluting traffic, with only narrow pavements for people and plants. **4. Do you think that there are other approaches that should be considered?** The idea is that everyone living in a city should have everything they need, services, shopping, employment, entrtainment, education, in easy reach without the need to go by car. Copenhagen and Utrecht have introduced what they call hyper-proximity, Melbourne has 20-minute neighbourhoods and now Paris is aiming for a15-minute city where you have access ro all you need within a quarter hour's walk or bike ride. Of course this should be London-wide, but it is an idea that Lewisham could take up and begin to implement. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	19	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes, and reducing car use, are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The implementation of these policies will be aided by Policy OL1, which is the spatial strategy. This seeks promote growth and regeneration around well-connected locations, such as town centres, where there are a wide range of services, facilities and job opportunities; this supports the 15-minute neighbourhood concept, however it is acknowledged that this could be clarified in the supporting text.	Policy OL1 spatial strategy supporting text amended to clarify support for 15-minute neighbourhood concept.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Pavement parking **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Parking **3. Please provide your comments on the topic(s) selected above.** If an aim is to 'Boost the number of journeys made by walking, cycling and public transport' then clearing parked vehicles from footways might be a start. There is hardly any attention given to this in Lewisham and certainly not in the West sub-area. Everyday I see parked cars	14	The draft Local Plan sets out the strategic approaches to car parking and managing parking stress. It is acknowledged that the policies will need to be amended to ensure conformity with the London Plan. Some areas of parking management are outside the scope of the Local Plan, for example illegal parking which would need to be dealt with through	No change.

		which would prevent someone with shopping or a buggy from passing, and require walking in the road. Of course walking in the road is also required to achieve social distancing under current conditions. **4. Do you think that there are other approaches that should be considered?** Given there is no 'approach' to this, then any actual action would be a start. It might not even be that expensive to manage although clearly outsourcing hasn't worked. The 'deaf-ear' approach really does need to be changed in respect of this problem. Enforcement of the law might be good: 1974 Greater London Council (General Powers) Act. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** **N/A**		enforcement action, rather than planning policy.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** The BIG problem is private vehicles. Associations of convenience, protection, necessity, freedom and social status are promoted massively in car advertising. This needs countering with the anti-social nature of private vehicles in large cities. **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets/ healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** It is clear that the use of private vehicles has become too intense in large cities (including other cities than London) both in terms of space - ie where to put all the cars - and in terms of carbon emissions. There is a further aspect which is the way in which motor vehicles are used: * speed and impatience of some drivers, * the 'look-at-me' strategies of very noisy motorbikes and loud sound systems in cars with the passenger window wound down The effect of this along rat-runs is to deter walking and cycling **4. Do you think that there are other approaches that should be considered?** The road signs pleading with motorists to stick to 20mph are pitiful. Perhaps an across London approach is needed for civilised motoring, which will include more enforcement (at a cost, but fines might be allocated to meeting those costs?) Second, a campaign which addresses the problem solving needed to 'give up your car'. Clearly saving a considerable amount of money is one point, but solving the problem of alternatives to the no-thought use of cars is another. A starter might be (a) how to get the kids to school (b) how to get your shopping (c) how to visit your friends. LTNs could be used to limit rat-runs **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	12	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes, and reducing car use, are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The Healthy Streets approach is advocated by the Local Plan. This includes measures to reduce vehicular dominance through development design. The setting and enforcement of speed limits is however outside the scope of the Local Plan. These suggestions will be forwarded to colleagues in the Council's transport service.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Pollution levels n main roads, poor implementation of Lee LTN and the continuing money being spent to fix mistakes you made while the rest is f the borough is crumbling.	2	The Low Traffic Neighbourhoods project is outside the scope of the Local Plan.	No change.

		2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** The LTN have pushed traffic onto surrounding roads, how can you continue the injustice of allowing some residents to be more polluted in order for some to have no pollution **4. Do you think that there are other approaches that should be considered?** Yeah complete some assessments, some consultations listen to those commenting on the platforms you created as you are FAILING to engage with people's concerns in any other way. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** You need to scrap and start again from a perspective of equality and fairness			
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** The disproportionate traffic now be forced through the Grove Park Ward as a result of the LTN **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** **Healthy streets/ healthy neighbourhoods** **3. Please provide your comments on the topic(s) selected above.** The introduction of the LTN is to promote health streets, but as the vast majority of traffic using the roads within the LTN was commuting traffic exiting the A2 and A20, the LTN has simply condensed this traffic into a smaller area and has turned Roads such as Harland Rd SE12 into a rat run or car park depending on the time of day, with a quadrupling of both noise and air pollution. **4. Do you think that there are other approaches that should be considered?** Unless you make the Kent commuters car journey significantly more expense either financially (tolls) or time (movement restrictions) they will continue to use the local streets as rat runs to avoid the A205. The current LTN needs to be expanded across the whole Grove Park Ward **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** Totally unworkable without the support of residents, but this must be ALL residents and not those lucky enough to be with the LTN	2	The Low Traffic Neighbourhoods project is outside the scope of the Local Plan.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.**	1	The Local Plan advocates for the Healthy Streets approach, which is to be applied throughout the Borough. As a strategic document, the plan signposts key major roads where particular attention is required and where significant amounts of development are planned to enable transformative investment in the	No change.

		What are you doing to reduce traffic on Manwood Road which is entirely residential. Cars speed at all times. Money should be spent on speed cameras and speed bumps which save lives not on cameras which fine people just trying to do a job. It used to have a bus gate. Can this be re-instated? It also needs an extension of the CPZ to stop commuters from driving to Lewisham for work or to take the train. Do not spend any more money on Hither Green until you have addressed others areas. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A		public realm. Further details for specific neighbourhoods or streets may be set out in the Local Implementation Plan (LIP), which is the council's transport strategy. The making of CPZ is outside the scope of the Local Plan. These are considered by the council's transport service.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Lack of connectivity in the area north of Grove Park, south of Hither Green on either side of the rail corridor. Opportunity to improve pedestrian/cycle links across the rail corridor in the proximity to Northbrook Park area with a potential station **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Sustainable transport and movement **3. Please provide your comments on the topic(s) selected above.** Should also promote more consistent services along rail corridors (Hayes line, Catford Loop line, Grove Park mainline and Grove Park to Bromley) to a minimum of 6tph (train every 10 minutes) at all times of the day and not just during the peaks. **4. Do you think that there are other approaches that should be considered?** Should consider an "inter-connected hub" approach that serves strategic nodes of transport south of the borough (sub-South Circular) and is located in central areas that can connect to the wider areas of each hub. Consider connecting Sydenham, Lower Sydenham, Beckenham Hill, Downham, Grove Park and onwards from each end, producing a strong east-west transport corridor, of some sort. Should also consider new 4tph 8-car London Overground services from Clapham Junction to Thamesmead (new station)/Plumstead via Brixton (new platforms), Peckham Rye & Lewisham. This can promote the need for Brockley Interchange (with services to both Victoria and Clapham Junction via Denmark Hill) and provide an alternative to the New Cross Overground spur extension, this can constrain capacity as it is only 5-car trains. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** The remodelling of the Lewisham Hub should be developed so that the DLR could be extended in future if required. Any further extension could be south along the Grove Park rail corridor and onwards to Bromley via the existing Bromley North rail corridor.	1	The council has and will continue to lobby central Government and the Mayor of London / Transport for London for investment in public transport infrastructure and improvements, including bus and rail services. However the scheduling of services and capacity on trains is outside the scope of the Local Plan. The Lewisham transport interchange upgrade is a key strategic transport project identified in the Local Plan. The Council will work in partnership with Network Rail and Transport for London on the design of the interchange, and seek to ensure that it maximises connections between the different modes of public transport.	Local Plan amended to provide further details on public realm enhancements and connectivity in Hither Green area.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Inequality, speeding	2	The Low Traffic Neighbourhoods project, road use levies, and making of CPZs is outside the scope of the Local Plan.	No change.

		2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below Parking Healthy streets / Healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** Shutting off roads (which didn't even have traffic problems) and installing bollards is having huge negative effects on community health services. I have already lost one quarter of my staff team as a result of the increased travel time and stress travelling. There was no consultation on road closures and staff haven't been repaid fines unwittingly received when trying to find routes to get to patients. **4. Do you think that there are other approaches that should be considered?** CPZ throughout the borough to stop commuter parking. Road pricing. Treat everyone the same. If you introduce LTN this should only be if residents on these roads get rid of their cars and permits. Also councillors should be made to declare any personal interests particularly when they live on roads which benefit from changes at the expense of other roads. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** Consider the impact of road closures on other roads and monitor pollution. Increased pollution due to specific changes will surely result in court action.		However the Local Plan makes clear that CPZs may be a tool required to manage parking stress within neighbourhoods and local areas. There are formal processes in place for elected Members to register interests in the Borough.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Sustainable transport and movement Healthy streets / healthy neighbourhoods Digital connectivity **3. Please provide your comments on the topic(s) selected above.** Wholeheartedly agree that more needs to be done to counter high pollution in the borough from through traffic. While much has been achieved in Hither green and Lee to prevent 'traffic rat runs' in Grove Park this is a major problem. I would like to see some streets here turned into safe walking/cycling streets, closed off at one end to stop rat run traffic. Also junctions of burnt ash hill and baring road with south circular are hostile areas for pedestrians and cyclists and should be improved. Are is crying out for more safe cycling lanes/quiet streets. These should prioritise children, so while school streets are a good start we need safe walking/cycling corridors that connect schools, parks etc **4. Do you think that there are other approaches that should be considered?** Consideration needs to be given to how people will work post pandemic. Many employers are actively considering allowing more working from home and having a smaller office footprint. Good digital infrastructure is important here to support the shift. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?**	10	The Local Plan advocates for the Healthy Streets approach, which is to be applied throughout the Borough. As a strategic document, the plan signposts key major roads where particular attention is required and where significant amounts of development are planned to enable transformative investment in the public realm. Further details for specific neighbourhoods or streets may be set out in the Local Implementation Plan (LIP), which is the council's transport strategy. The draft Local Plan includes a policy on digital infrastructure, recognising that this will be essential to sustainable economic development. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues	Additional evidence base documents have been prepared to inform the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections.

		Grove Park station needs to be shifted to Zone 2 like the rest of Lewisham stations.		Payment 'zones' for stations are established by Transport for London and not the Council.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** Not sure if this is meant to be covered in this topic - but there needs to be some guidance soon on how residents with no off-street parking can charge their vehicles at home safely. Have started to see electric cables being placed by residents across pavements from house to parked car on street - what is council policy on this? Is it allowed? Is it allowed if cable is covered with a cable mat? If yes, what is the recommended mat design? If not allowed then what are alternatives for home charging if no off-street parking? Can residents apply for a charging post outside their house... or within a block of flats... at what cost... with any planning requirement etc. Does Skanska have facility to apend charging points to their street light posts - assuming that they have been placed at the kerbside (many have been placed by Skanska away from the kerb, or in the middle of the pavement!). **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	3	The Local Plan will be amended to reflect London Plan parking standards for Ultra-Low Emission / electric vehicles. However in light of the climate emergency the use Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality. The Council's Electric Vehicle Charging Strategy provides further details and will support the implementation of the Local Plan.	The Local Plan amended to reflect London Plan parking standards for Ultra Low Emissions Vehicles. Local Plan amended to acknowledge that issues around the use of Low Emission Vehicles (e.g. carbon in production, pollution from tyre wear, etc.) and that a carefully managed approach to their use is therefore required.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Sustainable transport and movement Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** It seems from the proposals that the much vaunted "Lewisham Spine" has now been curtailed from just south of Lewisham Centre down to Catford, as opposed to the original proposal that provided a safe link through Lewisham Centre and up through Deptford. The current road layout through Lewisham Centre is extremely car oriented and a thoroughly unpleasant and dangerous area to cycle through even as an experienced cyclist. There is plenty of road space here to provide high quality cycle links through the junction from both the A20 and A21, which can then be taken on cycle lanes up Brookmill Road and Deptford Church Street to connect to the planned Cycleway 4. With the rest of the Lewisham Spine this would provide a very high quality cycle route from Lewisham/Catford up the way to Greenwich and then using Cycleway 4 to travel onward to Tower/London Bridge.	14	The a21 corridor is identified within the plan as a key public transport corridor and an opportunity for cycling provision to be improved. See Part 3 South Area Principles and LSA4 A21 Corridor / Bromley Rd	No change.

		It's very disappointing to find little to no discussion of this extremely important strategic cycle link in the transport proposals. Delivering quality cycling infrastructure through major junctions is undoubtably a significant challenge. However it is often the thought of tackling these junctions that contributes the most to the putting-off of new cyclists, and without dealing with these issues no amount of nice, easy to deliver cycle lanes on broadly straight roads will result in the modal shift the borough claims to be pushing for. **4. Do you think that there are other approaches that should be considered?** There are some who might consider the Waterlink Way to provide this sort of link and that any additional cycle lane would simply be "doubling up". However the Waterlink Way is not sufficient for regular travel as it often travels on paths that are often not well lit and are therefore relatively useless during winter or at night. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** While I've discussed the Lewisham Centre road layout here broadly the same car oriented issues can be found at Catford and should be addressed to allow cyclists to connect to the "Lewisham Spine" from south of Catford centre.			
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** More for protected cycleways throughout the borough, including on Old Kent Road/Lewisham Way **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** N/A **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?**	13	The Local Plan supports and seeks to promote cycling through the Healthy Streets Approach (see the Part 2 Transport policies for further details). The Lewisham Links policy also sets out a strategic network of cycleways that the council is seeking to protect and enhance. The specific nature of cycleways and cycle provision will be considered on a case-by-case basis. The Lewisham Cycle Strategy will set out further details to support implementation of the Local Plan.	Local Plan site allocations amended to signpost key cycleways that development proposals must respond positively to.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Not enough is said or done around the elderley or disabled, we'd all like to run, walk and cycle but to encourage shoppers and improve local businesses you need a better transport plan. **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Taxis and private hire vehicles Sustainable transport and movement **3. Please provide your comments on the topic(s) selected above.** its all well and good having healthier streets but some schemes stop shoppers and visitors venturing into such areas and merely raise the pollution outside these zones. make things easier for the public transport including taxis to serve the area **4. Do you think that there are other approaches that should be considered?**	4	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes, and reducing car use, are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. It is recognised that the delivery of modal shift may be more challenging in areas which currently do not benefit from good levels of public transport. The council has and will continue to	No change.

		N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A		lobby central Government and the Mayor of London / Transport for London for investment in public transport infrastructure and improvements, including bus services. The draft Local Plan policy TR6 recognises that taxis and private hire vehicles do play a role in meeting the transport needs of Londoners. It includes a policy on development proposals involving taxi hire businesses to ensure these uses are appropriately managed.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** LTN **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods Parking **3. Please provide your comments on the topic(s) selected above.** The LTNs will result in someone dying when traffic returns to normal **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	0	The Low Traffic Neighbourhoods project is outside the scope of the Local Plan.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** If people are so worried about the amount of car use in Lewisham why don't they move to the country where they have all the space they need. Housing is predominantly cheaper too. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	1	Noted.	No change.

	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** The rest of London has Santander bikes for hire, it would make sense to have them in Lewisham before we turn the place in to one giant cycle track. However it is dangerous to carry weekly shopping on a bike, I'd rather put it in my car as I am unable to carry anything due to my disability **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	4	Noted.	Local Plan amended to clarify and strengthen support for expansion of cycle hire.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** More free parking to encourage people to use local businesses **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** People's mental health can be detrimental affected when using public transport. No consideration for people that do not qualify for blue badges, as they are not disabled enough, but find longer distances difficult or too expensive on public transport **4. Do you think that there are other approaches that should be considered?** Yes keep it how it is **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** Yes don't do this whole survey online. A lot of people do not use internet (possibly older people) and they will be adversely affected and have no say.	1	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes, and reducing car use, are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. It is recognised that the delivery of modal shift may be more challenging in areas which currently do not benefit from good levels of public transport. The council has and will continue to lobby central Government and the Mayor of London / Transport for London for investment in public transport infrastructure and improvements, including bus services. The cost of parking is outside the scope of the Local Plan. The public consultation was carried out in accordance with the Council's adopted Statement of Community Involvement. Owing to the Government's social distancing guidelines in place at the time of the	No change.

				consultation, online consultation/engagement was necessary.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Sustainable transport and movement Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** I hope that the council can take a stronger position on low traffic neighbourhoods in future and not bow to immediate pressure to reverse them. While some of the arguments against them are no doubt well meaning they are often misguided and fail to recognise the non-intuitive effects of LTNs. For example the difference in low vs high income households living on residential streets (i.e. not main roads) is in reality extremely small at 89% vs 92% in outer London and even closer in inner London rendering the social equality argument largely ineffective. Regardless of this the idea that traffic will simply displace to the main roads anyway is provably false as once people get used to the new system many of the car journeys simply vanish as people adapt and begin to take trips by other modes of transport or indeed change their transport patterns entirely (there are countless pieces of research on this "induced demand" phenomenon). Over the medium term traffic on the main roads therefore returns to the pre-LTN equilibrium, and this can be seen clearly in the practical experience of other LTNs across London and indeed further afield. The council must defend these LTNs more vigorously and support the majority who are in favour of these schemes against the vocal minority who are opposed. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	20	The Low Traffic Neighbourhoods project is outside the scope of the Local Plan.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Parking **3. Please provide your comments on the topic(s) selected above.** My understanding is that currently people with a resident's parking permit are entitled to a certain amount of free visitor's parking. However residents without a permit (many of whom do not own a car at all) are not entitled to this free allowance. Why is it that this subsidy is provided to one group and not the other?	4	The cost of parking is outside the scope of the Local Plan.	No change.

		4. Do you think that there are other approaches that should be considered? N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A			
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** **N/A** **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Sustainable transport and movement Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** Strongly support the proposals to create Healthy Streets, with a focus on the most congested and polluted streets. Making walking and cycling easier and more accessible will be crucial to realising these ambitions. Healthy Neighbourhoods are also a positive step but they will require adequate funding to ensure people have greater incentives to take up active travel - ample cycle parking in the right places, removal of on-street car parking in some dense residential areas and 'local centres', and wider public realm improvements (greenery, seating etc). The 'parklet' on Staplehurst Road is a great example of what can be achieved in a microcosm, this approach should be rolled out across the borough, with the support of local residents and businesses. **4. Do you think that there are other approaches that should be considered?** The proposals to 're-route' the A205 are positive but this must be managed sensitively, it cannot simply divert all existing traffic away from Catford to other streets. Improving east-west active travel infrastructure will be key to reducing unnecessary local car journeys - walking or cycling on the A205 at present is extremely unpleasant and dangerous. Enabling active travel for local journeys will reduce pressure on the overcrowded network and create space for better walking & cycling infrastructure - an upward spiral. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	12	Support noted. The proposals for re-routing the South Circular pertain to a small section of the road at Catford Town Centre, which is necessary to deliver the comprehensive regeneration of the centre. Arrangements for delivery of the Local Plan, including infrastructure funding (for example to support the Healthy Streets Approach) are set out in Part 4 of the Local Plan.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Access to electric charging points **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** None chosen **3. Please provide your comments on the topic(s) selected above.** Pavements in Hither Green are not maintained. They do not promote walking. Maintain the pavements. **4. Do you think that there are other approaches that should be considered?**	4	The Local Plan will be amended to reflect London Plan parking standards for Ultra-Low Emission / electric vehicles. However in light of the climate emergency the use Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through	The Local Plan amended to reflect London Plan parking standards for Ultra Low Emissions Vehicles. Local Plan amended to acknowledge that issues around the use of Low Emission Vehicles (e.g. carbon in production, pollution from tyre wear, etc.) and that a carefully managed approach to their use is therefore required.

		Install more car charging points to enable electric cars. There are only 3 in Hither Green west and 11 in Lee Green - why? **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** No		tyre and brake wear and can therefore contribute to poor air quality. The Council's Electric Vehicle Charging Strategy provides further details and will support the implementation of the Local Plan.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Bakerloo Line extension Electric car charging points **3. Please provide your comments on the topic(s) selected above.** Bakerloo line - most important But we also need to think ahead - electric cars are coming. We need to plan for it and install chargers, not many people have off road parking where they can recharge their vehicles **4. Do you think that there are other approaches that should be considered?** Electric vehicle charging stations in residential roads **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	3	The delivery of the Local Plan is not contingent on the Bakerloo line extension, however the plan seeks to secure its future delivery. The Local Plan will be amended to reflect London Plan parking standards for Ultra-Low Emission / electric vehicles. However in light of the climate emergency the use Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality. The Council's Electric Vehicle Charging Strategy provides further details and will support the implementation of the Local Plan.	The Local Plan amended to reflect London Plan parking standards for Ultra Low Emissions Vehicles. Local Plan amended to acknowledge that issues around the use of Low Emission Vehicles (e.g. carbon in production, pollution from tyre wear, etc.) and that a carefully managed approach to their use is therefore required.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Southern and the Overground not providing the scheduled service. **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Sustainable transport and movement **3. Please provide your comments on the topic(s) selected above.** Southern and The Overground need to be held accountable to providing the scheduled service. The London Bridge Victoria Line is East West and was just removed from the timetable, with Southern trying to pretend it did not exist! **4. Do you think that there are other approaches that should be considered?** Ensure Southern and the overground continue to provide the scheduled service and improve it. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?**	4	The council has and will continue to lobby central Government and the Mayor of London / Transport for London for investment in public transport infrastructure and improvements, including bus and rail services. However the scheduling of services and capacity on trains is outside the scope of the Local Plan, and is dealt with separately by Network Rail and Transport for London.	No change.

		N/A			
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Sustainable transport and movement **3. Please provide your comments on the topic(s) selected above.** Contributors suggest extending tfl overground from new cross to blackheath. Big infrastructure changes would be needed at new cross and such services would add to "conflicts" at lewisham junctions slowing services. Old bay platform at blackheath overgrown and now has equipment embedded in it. However it is true that blackheath users do not have easy access to overground except via denmark hill. Narrow pavements in blackheath village indeed a worry in covid times and i have largely stopped going there. **4. Do you think that there are other approaches that should be considered?** Not much help that blackheath village is split between lewisham and greenwich **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	2	Draft Local Plan Table 12.1 on strategic transport priority projects included an aspiration for the New Cross to Lewisham overground extension, reflecting the council's Vision for Rail document. However this will be removed at the request of Transport for London. The Council has a statutory Duty to Cooperate with neighbouring authorities on strategic planning matters, and has done so with Greenwich on the preparation of the Local Plan, including on the town centre policies. As well, for the preparation of the Lee Green Neighbourhood Plan, which also deals with this town centre.	Table 12.1 on strategic transport priority projects amended to remove New Cross to Lewisham overground extension at request of Mayor of London / Transport for London.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods Parking Sustainable transport and movement Deliveries, servicing and construction Taxis and private hire vehicles **3. Please provide your comments on the topic(s) selected above.** I am very much in favour of the Low Traffic Neighbourhoods however they should be for everyone or for no one. So far the LTNs have only diverted the traffic to already busy and polluted areas and seem amazing for the streets which are part of the scheme and quite a nightmare for everyone else. The Healthy Street scheme seems like a good idea, our street is in line to become an Healthy Street, fingers crossed it will actually bring some change. **4. Do you think that there are other approaches that should be considered?** I think overall the council isn't ambitious enough in terms of clamping down car usage. In my view, the amount of cars in London is shocking and the majority of car users are just lazy. The minority who need their car for work or for limited mobility should receive some sort of relief for electric cars but everyone else should be heavily taxed. The levels of pollution are	11	The Low Traffic Neighbourhoods project is outside the scope of the Local Plan. Support for Healthy Streets Approach noted. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. The Healthy Streets Approach forms part of the strategic approach to address poor air quality in Lewisham and London. The Local Plan also includes a specific policy on air quality.	No change.

		unsustainable and impact everyone. The electric cars aren't a solution as they still contribute to particule pollution. The council should develop electric public transports (buses, taxis), facilitate car sharing (free parking in the borough), make pavement actually walkable, build cycling lanes on every street by removing most parking spaces and not facilitate car usage in any way. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** A resident in Lewisham lost a daughter to respiratory failure linked to pollution therefor I believe Lewisham should be at the forefront of the fight against pollution, a model for the rest of London.			
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods Parking Electric car charging Sustainable transport and movement **3. Please provide your comments on the topic(s) selected above.** Encouraging and facilitating Walking and Cycling is fabulous. BUT, any schemes must be intelligently designed - not quickly chucked in place. 'Modal filters' displace traffic onto already heavily polluted roads - residential roads. There is a basic social injustice in the 'low traffic neighbourhood schemes' that a Labour council should be ashamed of. They re-arrange the traffic but do nothing to make walking and cycling further than ones immediate neighbourhood more unpleasant and dangerous. **4. Do you think that there are other approaches that should be considered?** More carrot less stick. New developments MUST have electric car charging facilities for the number of parking spaces they are going to provide. Not 'encouraged' to do so - but MADE to do so. Reduce and enforce speed limits - particularly in residential areas - near schools etc. More school streets. To prioritise walking and cycling does not have to mean planters and road blocks. These cause gridlock and pollution. Give people visible viable alternatives. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** **N/A**	4	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. 'Modal filters' were part of the Low Traffic Neighbourhood Scheme, which is outside the scope of the Local Plan. The Local Plan will be amended to reflect London Plan parking standards for Ultra-Low Emission / electric vehicles. However in light of the climate emergency the use Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality. The Council's Electric Vehicle Charging Strategy provides further details and will support the implementation of the Local Plan. The enforcement of speed limits is outside the scope of the Local Plan.	Local Plan amended to refer to the London Cycle Design standards and to ensure these are applied. The Local Plan amended to reflect London Plan parking standards for Ultra Low Emissions Vehicles. Local Plan amended to acknowledge that issues around the use of Low Emission Vehicles (e.g. carbon in production, pollution from tyre wear, etc.) and that a carefully managed approach to their use is therefore required.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Thge need to fit in with neighbouring boroughs as people need cross boundary services.		The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of	No change.

		2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below Parking **3. Please provide your comments on the topic(s) selected above.** Dont penalise cars, they are here to stay in one form or another, just make the alternatives more attractive. **4. Do you think that there are other approaches that should be considered?** Think through the end-to-end energy costs of proposals before commiting to them. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** **N/A**		public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. Reducing demand for and use of cars is central to the London Plan and therefore Local Plan.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Improving the road network and cutting traffic congestion **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets /healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** Healthy streets/neighbourhoods have been very damaging concepts in terms of increased traffic congestion and worse air pollution. There is no simple solution to reducing traffic and most of these policies are promoted by people who don't face the practical difficulties of moving around. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	6	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. Reducing demand for and use of cars is central to the London Plan and therefore Local Plan.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** N/A **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Sustainable transport and movement **3. Please provide your comments on the topic(s) selected above.** We have good bus provision but it appears to be misused by too many who "bilk" and too few ticket inspectors. TFL to be congratulated on move to e-buses. Over dependence on cars a national matter - higher motoring taxes a priority. **4. Do you think that there are other approaches that should be considered?**	7	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. Reducing demand for and use of cars is central to the London Plan and therefore Local Plan. However, levies on vehicle or road use are outside the scope of the Local Plan.	No change.

		N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A		Enforcement on the public transport network (e.g. fare dodging) is outside the scope of the Local Plan.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Traffic **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods Sustainable transport and movement **3. Please provide your comments on the topic(s) selected above.** Again no investment in Hither Green west of the tracks is shown. The whole area is ignored in your proposals, no investment in cycling and walking. **4. Do you think that there are other approaches that should be considered?** Investment is not balanced across Lewisham. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	4	Noted.	Local Plan amended to provide further strategic objective and policies for Hither Green including area west of the station.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** The council needs to sort out the current traffic issues before planning future projects. **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods Sustainable transport and movement **3. Please provide your comments on the topic(s) selected above.** The current LTN not only increases overall pollution in the borough but impacts negatively on local businesses and residents alike. The council seem to have no idea how to manage traffic flow, the newly designed junction at Lewisham High Rd and Ladywell High Rd is a perfect example of this. How many electric vehicles do the council have? Sat and watched three 70 plate Diesel mini buses pull out of the depot at Ladywell. Why are these not electric? **4. Do you think that there are other approaches that should be considered?** Need to get a proper charging network in the borough including chargers in current street lighting and furniture. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	3	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. Reducing demand for and use of cars is central to the London Plan and therefore Local Plan. However, levies on vehicle or road use are outside the scope of the Local Plan. Low Traffic Neighbourhoods project is outside the scope of the Local Plan. The Council's Climate Emergency Action Plan notes the potential for expanding its fleet of service vehicles to Ultra Low Emission or electric, however this will be contingent on resources / funding available.	No change.

	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** The closure of random streets to traffic **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** **None chosen** **3. Please provide your comments on the topic(s) selected above.** I understand that fewer cars means a healthier environment, but the closure of random residential streets to through traffic has not reduced car use, but merely directed it elsewhere. The closure of Bishopsthorpe Road and Silverdale are a case in point. The reason given was to give more space to pedestrians, particularly during COVID. The real reason might be more to do with accessing government grants. There are very few pedestrians at any one moment on Bishopsthorpe, so that reason does not hold water. With the previous closure of Queensthorpe Road, all traffic getting on to Sydenham Road is coming down Mayow Road. This has resulted in jams, with cars idling and polluting at the traffic lights, and more traffic (& more speeding) on Mayow Road, which has two park entrances, one large school and is a thoroughfare for three other schools in the roads adjoining. It must be rethought. **4. Do you think that there are other approaches that should be considered?** Yes **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** No	6	This comment appears to be referring the Low Traffic Neighbourhoods project, which is outside the scope of the Local Plan.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Greening or reduction of car parks **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods Sustainable transport and movement Parking **3. Please provide your comments on the topic(s) selected above.** There are a number of smaller car parks (e.g. Clarendon rise, slaitewaite road) that encourage car traffic through residential areas. This contradicts the healthy street proposals. Could all town centre car parking be centralised (e.g. Lewisham town centre multi-storey) and these small car parks turned into green space close to town centres? **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A		Noted. The Local Plan includes a number of proposals which support the rationalisation of existing car parking provision within town centres. The Local Plan also includes updated policies on car parking, which will provide greater support for car-free and car-lite development. It is acknowledged that some commercial uses require car parking, and some centres benefit from a certain provision of spaces being made available, and therefore parking will need to be carefully managed.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Speeding	10	Enforcement of speeding is outside the scope of the Local Plan.	No change.

		2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** I am sick and tired of people speeding, including buses. I have reported it to the Police and the Council and NOTHING gets done. Every day on Woolstone Road I see cars travelling WAY above the limit (20mph), doing more like 50-60mph. Buses also speed. Recently someone drove at me deliberately, same thing happened to my neighbour, I reported the car reg to the police, who did nothing even though they admitted they had other complaints against the same car - why are there not SPEED CAMERAS? Someone is going to DIE. It is only a matter of time. **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A		The draft Local Plan advocates for the Healthy Streets Approach, which aims to reduce vehicular dominance and improve road safety.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** Remove the LTNs and useless Bike lane from Molesworth street **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods Parking **3. Please provide your comments on the topic(s) selected above.** - Remove the useless LTNs and if you wish to adopt them, please run a consultation, and not use this abomination of a website called 'Commonplace' - Remove the bike lane from Molesworth street, or have the decency to patrol cyclists using both road and pavement as they please, and cross red lights like pedestrians did not exist - Lower price of parking permit for electric cars. Lewisham has some of the highest charges for parking permit across all London boroughs **4. Do you think that there are other approaches that should be considered?** N/A **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	3	The Low Traffic Neighbourhoods project, car parking pricing and highways enforcement are outside the scope of the Local Plan.	No change.
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** There is no discussion of provision of public transport to Blackheath which needs improving. It would be helpful if the briefly mentioned Overground extension from New Cross went to Blackheath where the currently disused bay platform could be brought back into use. The	2	Draft Local Plan Table 12.1 on strategic transport priority projects included an aspiration for the New Cross to Lewisham Overground extension, reflecting the council's	Table 12.1 on strategic transport priority projects amended to remove New Cross to Lewisham overground extension at request of Mayor of London / Transport for London.

		question of traffic in Blackheath Village needs to be addressed with a widening of pavements and a change in priorities to give pedestrians priority and slow down the traffic e.g. more pedestrian crossings and replacing the pelicans with zebras. The level of traffic in Blackheath Village is also an issue for air quality. **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** More needs to be done in Blackheath Village to restrict access to traffic and give pedestrian priority. The pavements should be widened and the road narrowed. Blackheath needs better public transport. Lewisham as a whole suffers from not having the tube and with the exception of the DLR only the substandard services of Southeastern. Why are our trains so slow, much slower than in the 1950s with a marked deterioration in journey times since the 1980s whereas train services have got much faster in most parts of the country? **4. Do you think that there are other approaches that should be considered?** Full information needs to be provided on the proposed Overground extension. Where LTNs are implemented they need to be fair and take into account the needs of local residents. The South Row LTN was a disaster and marooned us in our homes turning simple 10 minute journeys into 30-40 minute trips and putting unnecessary additional traffic pressure on Blackheath Village. This proposal should be scrapped permanently. **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A		Vision for Rail document. However this will be removed at the request of Transport for London. The Local Plan supports and seeks to promote cycling through the Healthy Streets Approach (see the Part 2 Transport policies for further details). The specific nature of public realm enhancements (such as walking routes cycleways) will be considered on a case-by-case basis. Further information may also be set out in the Council's Local Implementation Plan (LIP). The Low Traffic Neighbourhoods project is outside the scope of the Local Plan.	
	Transport and connectivity	**1. Are there other issues around transport and connectivity that the Local Plan should address?** YES not everyone wants car free traffic, not everyone can walk or cycle **2. Do you have any comments on the proposed approaches to transport and connectivity? Select the topic(s) and comment below** Healthy streets / healthy neighbourhoods **3. Please provide your comments on the topic(s) selected above.** The current LTN in Lee Green is not working for all, it's been an absolutely disgrace and I will not support any attempt to roll them out further. They have made many people's lives an absolute misery. Not everyone can walk or cycle and those people have been completely overlooked. For people living on roads outside the boundary it's been a living hell with constant traffic jams all day long. This is now slightly eased by the rollback of the LTNs and lockdown but if they are rolled out further you will playing with peoples health and mental wellbeing **4. Do you think that there are other approaches that should be considered?** Enforce speeding. Put in ANPR cameras so locals can still drive around Lewisham as needed **5. Do you have any additional comments on the 'Transport and Connectivity' section of the Local Plan?** N/A	4	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions and policies and are set out clearly in Part 2 Transport policies. Reducing demand for and use of cars is central to the London Plan and therefore Local Plan. However, levies on vehicle or road use are outside the scope of the Local Plan. Highways enforcement (including speeding) is outside the scope of the Local Plan.	No change.

Lewisham Local Plan

Regulation 18 consultation statement

Appendix 3 – Regulation 18 Draft Local Plan Commonplace Responses Part 3

September 2022

Part	Section, policy or paragraph	Comment	Agree	Council officer response	Action
3	-	**1. Do you have any comments on the 'character area' boundaries?** The Telegraph Hill Ward is not in the Telegraph Hill East section. If there is difference it will cause confusion in terms of councillors and the conversation area's planning rules. Include the whole of Telegraph Hill Ward in the area. **2. For each 'character area' the Local Plan sets out a vision, key objectives and area-based policies (including site allocations). Do you think that there are other matters that should be addressed in this part of the plan?** N/A	0	The Local Plan character areas (and neighbourhoods within them) were informed by the Lewisham Characterisation Study, which was prepared in collaboration with community groups and subject to public consultation. Whilst it is acknowledged that people may not agree with the geographical extent of the areas, the character areas provide a useful way of establishing planning priorities and policies at a more localised neighbourhood (rather than borough-wide) level. The Local Plan must be read as a whole for planning decisions.	No change.
3	-	**1. Do you have any comments on the 'character area' boundaries?** Please don't ignore the A205 Stansted Road parade of shops (nos 294-341) which is a real trouble spot and totally NEGLECTED. There is high pollution due to bad traffic on A205. Traffic flow must be improved. Please don't ignore us just before we sit on the border between two wards, we are always forgotten! **2. For each 'character area' the Local Plan sets out a vision, key objectives and area-based policies (including site allocations). Do you think that there are other matters that should be addressed in this part of the plan?** Please don't ignore the A205 Stansted Road parade of shops (nos 294-341) which is a real trouble spot and totally NEGLECTED. There is high pollution due to bad traffic on A205. Traffic flow must be improved. Please don't ignore us just before we sit on the border between two wards, we are always forgotten!	0	The Local Plan acknowledges the issues of air quality and congestion along the South Circular. It seeks to facilitate the transformation of A205 using the Healthy Streets Approach, including the stretch covering the Stansted Road parade. However, as a TfL road that is a major route, the Council will need to work with the GLA/TfL to deliver improvements, the specific nature of which will be considered on a case-by-case basis. In addition, the draft Local Plan proposes to designate 118 Stansted Road as part of a new Cultural Quarter. It is hoped that this will help to support the vitality and viability of the parade, which is in close proximity.	No change.
3	-	**1. Do you have any comments on the 'character area' boundaries?** The boundaries do not seem quite right in the sense that the Telegraph Hill and Hatcham Conservation Areas are linked (historically and in that they currently form one community) along with the traditional high street on New Cross Rd, which provides the centre/ focus to both. Anything that happens in any of these 3 designated areas is connected and affects the other 2. So protections and plans the affect all 3 should be joined up. Calling the shopping area in heart of this joined up area, 'Hatcham Works', does not make it an industrial site or somehow NOT connected to residential and retail community around it. The opposite is true. It clearly should be developed to be an extension of the streets around it, perhaps with the Hatcham and Telegraph Hill street extended through the site and sympathetically developed with homes and shops and parkland that is in the style of the surrounding and enhances community facilities for those already living there. Where parts of the historic high street scene has been lost, it should be restored in its former style to properly connect the whole area again as one community with the same boundary.	1	The Local Plan character areas (and neighbourhoods within them) were informed by the Lewisham Characterisation Study, which was prepared in collaboration with community groups and subject to public consultation. Whilst it is acknowledged that people may not agree with the geographical extent of the areas, the character areas provide a useful way of establishing planning priorities and policies at a more localised neighbourhood (rather than borough-wide) level. The Local Plan must be read as a whole for planning decisions. Part 2 of the Local Plan on Heritage sets out approaches for preserving and enhancing heritage assets, including Conservation Areas. The Council has and is continuing to prepare Conservation Area Appraisals to support the Local Plan.	No change.

		2. For each 'character area' the Local Plan sets out a vision, key objectives and area-based policies (including site allocations). Do you think that there are other matters that should be addressed in this part of the plan? How to strengthen protection of the Conservation Areas and to stimulate their restoration to their former glory.			
3	-	**1. Do you have any comments on the 'character area' boundaries?** Some of the areas seem to have little connection with local communities. Blackheath really has zero connection with Grove Park. Telegraph Hill is next door to New Cross and miles from Sydenham. I have lived in Sydenham, Brockley and Honor Oak Park and they are on the same railway line. Ladywell and Crofton Park are on different lines. There is no bus connection to Telegraph Hill from the other areas associated with it. I can't see the benefit apart from a bureaucratic neatness to this 'Area'. The notion of an 'area' having a 'character' is superficial and I doubt much empirical connection of any description could be found to link these areas. **2. For each 'character area' the Local Plan sets out a vision, key objectives and area-based policies (including site allocations). Do you think that there are other matters that should be addressed in this part of the plan?** N/A	2	The Local Plan character areas (and neighbourhoods within them) were informed by the Lewisham Characterisation Study, which was prepared in collaboration with community groups and subject to public consultation. Whilst it is acknowledged that people may not agree with the geographical extent of the areas, the character areas provide a useful way of establishing planning priorities and policies at a more localised neighbourhood (rather than borough-wide) level. The Local Plan must be read as a whole for planning decisions.	No change.
3	-	**1. Do you have any comments on the 'character area' boundaries?** Yes **2. For each 'character area' the Local Plan sets out a vision, key objectives and area-based policies (including site allocations). Do you think that there are other matters that should be addressed in this part of the plan?** Might be useful to start thinking about distinctive names for these areas that define part of their character. For example: the West area includes lots of places with 'Hill' in their name - reflecting the area topography. So perhaps could be called 'The Hills'? Initiating local consultation on character area names might galvanise participation in the Lewisham Local Plan.	0	Noted. It is agreed that distinctive names for the areas could assist with making Part 3 of the Local Plan a more engaging and colourful. However, for clarity it proposed to retain the existing names. It is noted that bespoke graphics and iconography were created for each character area and incorporated into consultation materials during the Regulation 18 stage, such as leaflets and social media posts.	No change.
3	-	**1. Do you have any comments on the 'character area' boundaries?** It seems to make sense from a planning point of view but loses the neighbour context in the process. I doubt if you will get anything like agreement to propositions around this soirt of issue; think back to the local government boundary commission review..... Is this really necessary or will it be an administrative redundancy? **2. For each 'character area' the Local Plan sets out a vision, key objectives and area-based policies (including site allocations). Do you think that there are other matters that should be addressed in this part of the plan?** N/A	0	The Local Plan character areas (and neighbourhoods within them) were informed by the Lewisham Characterisation Study, which was prepared in collaboration with community groups and subject to public consultation. Whilst it is acknowledged that people may not agree with the geographical extent of the areas, the character areas provide a useful way of establishing planning priorities and policies at a more localised neighbourhood (rather than borough-wide) level. The Local Plan must be read as a whole for planning decisions.	No change.
3	LCA	**1. Do you have any comments on the proposed vision?** Overdevelopment throughout the borough with no given upgrade to transport links past phase 1 of the Bakerloo Extension. The proposed is unviable without firm commitments. the Local Plan undermines all previous approaches into sensitivities to existing historic buildings, neighbourhoods and areas as has been mentioned throughout the Catford Framework Plan. Lewisham Council has created a rod for its back that is only achievable by developing the rest of the borough in a similar was to that seen at Lewisham Gateway. The plan is going to lead to missed opportunities	3	Noted. The Catford Town Centre Framework provides a strategic framework for the regeneration of Catford town centre and is an evidence base document that is being used to inform the preparation of the Local Plan. The Framework was informed by public consultation. The Local Plan consultation is being carried out in accordance with the Council's adopted Statement of	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

		and mistakes that will be with the borough population for generations and encourages demolition rather than creative reuse which would be more aligned with the declared Climate Emergency which I do not believe the council takes seriously through the proposed documents out for consultation. From the Catford Framework response the message is clear that high rise is not wanted and is not considered by those who live in the borough suitable who will be living next to 15+ storey towers; overshadowing them and their private amentiy spaces of the numerous Victorian Terraces that make up the area. Reconsider you approach and how sensitivity needs to be considered as previous Plans, studies and policies encouraged. **2. Do you have any comments on the proposed key objectives?** The basis of the objectives is sound, but the scale is inappropriate. Often masquerading under the remit that you asked people what they wanted, have put everything in and now say that we must accept high rise development. No mention of this was made when asking what people wanted - you have used consultation in a way that has meant you can justify inappropriate development in areas which your own documents say is not appropriate and therefore go against the current London Plan. This is shameful of the council and something that is being noted with the upcoming elections. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LCA3: Catford major centre and surrounds LCA1: Central Area place principles LCA2: Lewisham major centre and surrounds LCA4: A21 corridor LCA5: Central Lewisham Links **4. Please provide your comments on the topic(s) selected above.** Overdeveloped, too high, no sensitivity to existing historic neighbourhoods such as Rushey Green, listed and locally listed buildings and conservations areas. Miss use of consultation to sell a vision to a community with no mention of what this truly means. Re-written studies such as the Tall Buildings Study to suddenly claim large areas are suitable for high rise despite these areas always previously being noted as highly senstive (such as Holbeach School and the two storey victorian terraces of Rushey Green). Complete disregard for overlooking of existing private amenity space, microclimate and rights of light. A balance needs to be realised and the council needs to understand that high rise is not the answer. With no additional transport infrastructure guaranteed the are can not support what is proposed. No explanation is given to why Catford if not given a high and low target that is dependant on the Bakerloo Line Extension being confirmed and completed in the way that areas south of Catford have been. Further, with increase in populations to the south, this strengthens the need for increased and better rail and transport connections that the Council are not committing to. The Council need to be realistic, under take proper surveys and not just make assumptions. These comments are applicable to the majority of areas in the plan. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Catford Shopping Centre /Milford Towers Plassy Rd Island		Community Involvement. The Local Plan is distinguished from the Catford Town Centre Framework in that it is a Development Plan Document and therefore subject to different statutory requirements and consultation procedures, the Council's compliance with which will be considered at the plan's examination in public. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. Whilst acknowledging the challenge of delivering on Lewisham's housing target and meeting local needs for new workspace, town centre floorspace and infrastructure, the draft Local Plan seeks to promote a character-led approach to managing growth and development. It has been informed by the Lewisham Characterisation Study, which has provided a steer for the spatial strategy set out in Part 1 of the plan, along with the sub-area strategies set out in Part 3. Both the London Plan and draft Local Plan set out detailed design requirements for development proposals involving tall buildings (including consideration of visual, functional, environmental and cumulative impacts), along with specific policies dealing with amenity impacts for all development proposals. It is considered that these policies will provide a robust basis for considering the impacts of tall buildings. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social transport infrastructure required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	

		6. Please provide your comments on the site allocation(s) selected above. Too much development, not enough promise of increased infrastructure and too much is pinned on items outside of the Councils control. The Council need to get these elements under control prior to proposing development of this size and nature. Lewisham Gateway has already won a Carbuncle Cup for Lewisham Gateway which is already looking dated with buildings like the gym in bad need for some additional building work prior to the pandemic. Why does Lewisham seek to win more Carbuncle awards by proposing development of this nature? Please stop committing to residential increases without doing proper studies on what the issues with the current infrastructure is - this needs to be past desktop studies undertaken by people who do not need the area as is evident through your documents and responses to the Catford Framework. Sites need to be respectful to historic neighbourhoods and existing building heights as outlined in Historic England guidance. When previously queried this is obviously not of priority to the Council. Overshadowing these elements and being overbearing on them will destroy the communities and culture that exists and makes parts of Lewisham special. Local Plan proposes overdevelopment and will be used negatively by contractors and those looking for quick and easy profit rather than the true investment the borough needs. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Listen to your communities and stop masquerading community consultation in the manner being used - it is untruthful and back handed			
3	LCA	**1. Do you have any comments on the proposed vision?** I would like to express my concerns about the redevelopment of Lewisham Retail Park, Loampit Vale into a mixed use residential and commercial area. In addition to two major retailers, Sports Direct and Matalan currently onsite, Lewisham Retail Park, Loampit Vale is also the home of SET Lewisham, a community artist-led studio and project space, and Lewisham Wing Chun, a full time self defence school for adults and children led by Sifu Paul Thompson, part of the WCUK organisation. Both spaces – SET Lewisham and Lewisham Wing Chun – have significantly benefited the community and cultural values of Lewisham and its residents since they started at this former Mothercare retail space in January 2019. I feel passionately that we must secure this space and work our hardest as a community to ensure it is not destroyed and lost forever. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LCA2: Lewisham major centre and surrounds **4. Please provide your comments on the topic(s) selected above.** Reconsider the development of Lewisham Retail Park, Loampit Vale which is a vital community space and creative hub for artists. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Lewisham Retail Park, Loampit Vale	1	Lewisham Retail Park has an existing approved planning application. The Local Plan does however seek to protect cultural, community and employment uses within the borough and we will work with the developer to understand how this space can be relocated. The Councils Economic Development department also play a role in looking for suitable alternative space and we will pass on your comments.	No change.

		6. Please provide your comments on the site allocation(s) selected above. To "re-develop" Lewisham Retail Park, Loampit Vale, would mean the absolute destruction of two community spaces - SET Lewisham and Lewisham Wing Chun - which have actually helped Lewisham thrive and grow as a community and bring its residents together, especially in a time of global uncertainty. I fear that Lewisham Retail Park, Loampit Vale is vulnerable to being "re-developed" and the destruction of these places would completely compromise the vision and values that the Local Plan is proposing: a vibrant hub of cultural, commercial and community activity (which both SET and Wing Chun represent!). Since opening in 2019, SET Lewisham has become a safe space to think, make, create, and exchange ideas. SET Lewisham has always been welcoming and inclusive of all individuals and backgrounds, especially from the LGBTQ+ community, people of colour, and low income households, and consistently provides a high quality and affordable studio space to ensure its inclusivity. The ability to have an affordable studio space is especially important for younger individuals who are struggling with money and being able to afford an artist studio and somewhere to live. As part of the building, there is a project space which has also been fruitful for artists to make new and ambitious work, as well as present free exhibitions of contemporary art, injecting new energy and vitality into the community of Lewisham and individuals from the art community, who can easily access the space within 15 minutes of public transport. This project space has also become increasingly collaborative and interdisciplinary, hosting performance art, dance, music, screenings, poetry readings, creative and educational workshops, a guest curated residency programme and other free, live events for the community of Lewisham and aligned with Lewisham's greater vision as it prepares to host the London Borough of Culture 2022. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Provide affordable artist studios and community spaces if the re-development goes ahead!			
3	LCA	**1. Do you have any comments on the proposed vision?** Provide affordable spaces for artists. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LCA2: Lewisham major centre and surrounds **4. Please provide your comments on the topic(s) selected above.** Reconsider Lewisham Retail Park, a vital community space and creative space for artists. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Lewisham Retail Park, Loampit Vale **6. Please provide your comments on the site allocation(s) selected above.**	0	Lewisham Retail Park has an existing approved planning application. The Local Plan does however seek to protect cultural, community and employment uses within the borough and we will work with the developer to understand how this space can be relocated. The Councils Economic Development department also play a role in looking for suitable alternative space and we will pass on your comments.	No change.

		I am very concerned about the redevelopment of Lewisham Retail Park, Loampit Vale into a mixed use residential and commercial area. In addition to two major retailers, Sports Direct and Matalan currently onsite, Lewisham Retail Park, Loampit Vale is the home of SET Lewisham, a community artist-led studio and project space, and Lewisham Wing Chun, a full time school, part of the WCUK organisation, led by Sifu Paul Thompson, that teaches adults and children self-defense. Both spaces – SET Lewisham and Lewisham Wing Chun – have significantly benefited the community, cultural values and well-being of Lewisham and its residents since they started at this former Mothercare retail space spanning 12,000 sq ft in January 2019. While I will speak more about the value of SET Lewisham, some testimonials from the Lewisham Wing Chun have described the following: - I started training with Sifu 8 months ago and I can honestly say that I look forward to every session! He gives the school a unique family feel, a welcoming and fun environment, where I feel safe and confident training. With a perfect balance between wise and lively, he's very approachable and provides gentle correction. I definitely feel more confident in day-to-day life, and I look forward to many more lessons! - As a total beginner to martial arts, Sifu Paul made me feel at ease and went at my pace while still keeping it dynamic and allowing the class of mixed ability to progress together and challenging everyone. Highly recommend to anyone looking for a fun and exciting way to get fit and learn a new skill. - Sifu Paul's classes are fun and lively. The content is accessible from improving fitness to developing a technique and applying it to a given situation. There's also an element of fun and laughter within classes. Time spent with Sifu is always looked forward to. To "re-develop" Lewisham Retail Park, Loampit Vale would mean the absolute destruction of two community spaces which have actually helped Lewisham thrive and grow as a community and bring its residents together, especially in a time of global uncertainty. While the pandemic has brought its challenges to everyone, I fear that Lewisham Retail Park, Loampit Vale is vulnerable to being "re-developed" and completely compromising this vision and values that the Local Plan is proposing. SET Lewisham, in particular, where I am an artist and share a studio space, has completely transformed in the two years I have been there. As artists and a community in South East London, we are resourceful, creative and have been able to meaningfully use this space to create independent artist studios, where was nothing. Part of the wider SET network of studios across London with a membership of over 500 individuals, SET Lewisham has been a cultural hub for young and emerging artists, especially individuals finishing degrees in fine art, design and film at some of the most prestigious universities in the U.K. and internationally including Central Saint Martins, the Royal Academy of Arts, the Royal College of Art, and Goldsmiths, University of London. It has become a safe space to think, make, create, and exchange ideas. SET Lewisham has always been welcoming and inclusive of all individuals and backgrounds, especially from the LGBTQ+ community, people of colour, and low			

		income households, and consistently provides a high quality and affordable studio space to ensure its inclusivity. The ability to have an affordable studio space is especially important for younger individuals who are struggling with money and being able to afford an artist studio and somewhere to live. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Provide affordable artist studio provision, if new building goes ahead.			
3	LCA	**1. Do you have any comments on the proposed vision?** In general yes land needs to be used in the best way possible. However the ongoing dogs dinner (like Croydon on acid) at Lewisham Gateway makes me very worried about the design and density of some of these sites. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LCA4: A21 corridor **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Land at Rushy Green / Bradgate Road Ladywell Play Tower **6. Please provide your comments on the site allocation(s) selected above.** This sentence from the plan - Rosenthal House, opposite on the eastern side of Rushey Green, establishes a wayfinding precedent at this end of the town centre, which this site may work in conjunction with to enhance townscape and legibility. This is the most ridiculous way of saying we want to build another high rise tower that I have ever seen. Just because there is one badly designed tower with appalling street frontages and a mecca for rubbish, does not mean bang another one up next to it! The shadow of any tower will block sunlight into people's south facing aspects on Bradgate Street, and block afternoon and evening sun on Rosenthal Road. Plus cause unbelievable disruption and noise for residents for the several years it will take to build. No thanks! Low rise developments only in these areas. The complete cock up of the Ladywell Playtower is an example of getting a good idea, and then making it unfeasible. I highly doubt whether any cinema could invest in this in post COVID world, this incredible building is falling into ruin whilst the council argued and amended agreed upon proposals. What a disgrace. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	Noted. The proposed site allocation for Land and Rushey Green and Bradgate Road is located within a London Plan Opportunity Area and major district centre. The London Plan directs that higher density developments should be considered in these locations. The indicative site development capacity has been established using a standard methodology, as set out in the Site Allocations Background Paper. Should any future development proposal come forward, buildings heights and density will be considered through the planning approvals process, and informed by the design-led approach. Applications will need to demonstrate the design will respond positively to local character and not result in adverse impacts on amenity of neighbouring properties. It is acknowledged that the reference to Rosenthal House as a wayfinding precedent should be removed. The Ladywell Playtower has been submitted for planning. Members of the public can respond through the Development Management Porcess.	Local Plan site allocation for Land at Rushey Green and Bradgate Road (Aldi) amended to remove development guideline concerning Rosenthal House.
3	LCA	**1. Do you have any comments on the proposed vision?** N/A	1	Lewisham Retail Park has an existing approved planning application.	No change.

		2. Do you have any comments on the proposed key objectives? N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Lewisham Retail Park, Loampit Vale **6. Please provide your comments on the site allocation(s) selected above.** I am very concerned about the re-development of Lewisham Retail Park, Loampit Vale into a mixed use residential and commercial area. In addition to two major retailers, Sports Direct and Matalan currently onsite, Lewisham Retail Park, Loampit Vale is the home of SET Lewisham, a community artist-led studio and project space, and Lewisham Wing Chun, a full time school, part of the WCUK organisation, led by Sifu Paul Thompson, that teaches adults and children self-defense. Both spaces – SET Lewisham and Lewisham Wing Chun – have significantly benefited the community, cultural values and well-being of Lewisham and its residents since they started at this former Mothercare retail space spanning 12,000 sq ft in January 2019. While I will speak more about the value of SET Lewisham, some testimonials from the Lewisham Wing Chun have described the following: - I started training with Sifu 8 months ago and I can honestly say that I look forward to every session! He gives the school a unique family feel, a welcoming and fun environment, where I feel safe and confident training. With a perfect balance between wise and lively, he's very approachable and provides gentle correction. I definitely feel more confident in day-to-day life, and I look forward to many more lessons! - As a total beginner to martial arts, Sifu Paul made me feel at ease and went at my pace while still keeping it dynamic and allowing the class of mixed ability to progress together and challenging everyone. Highly recommend to anyone looking for a fun and exciting way to get fit and learn a new skill. - Sifu Paul's classes are fun and lively. The content is accessible from improving fitness to developing a technique and applying it to a given situation. There's also an element of fun and laughter within classes. Time spent with Sifu is always looked forward to. To "re-develop" Lewisham Retail Park, Loampit Vale would mean the absolute destruction of two community spaces which have actually helped Lewisham thrive and grow as a community and bring its residents together, especially in a time of global uncertainty. While the pandemic has brought its challenges to everyone, I		The Local Plan does however seek to protect cultural, community and employment uses within the borough and we will work with the developer to understand how this space can be relocated. The Councils Economic Development department also play a role in looking for suitable alternative space and we will pass on your comments.	

		fear that Lewisham Retail Park, Loampit Vale is vulnerable to being "re-developed" and completely compromising this vision and values that the Local Plan is proposing. SET Lewisham, in particular, where I am an artist and share a studio space, has completely transformed in the two years I have been there. As artists and a community in South East London, we are resourceful, creative and have been able to meaningfully use this space to create independent artist studios, where was nothing. Part of the wider SET network of studios across London with a membership of over 500 individuals, SET Lewisham has been a cultural hub for young and emerging artists, especially individuals finishing degrees in fine art, design and film at some of the most prestigious universities in the U.K. and internationally including Central Saint Martins, the Royal Academy of Arts, the Royal College of Art, and Goldsmiths, University of London. It has become a safe space to think, make, create, and exchange ideas. SET Lewisham has always been welcoming and inclusive of all individuals and backgrounds, especially from the LGBTQ+ community, people of colour, and low income households, and consistently provides a high quality and affordable studio space to ensure its inclusivity. The ability to have an affordable studio space is especially important for younger individuals who are struggling with money and being able to afford an artist studio and somewhere to live. I am fortunate to have been able to afford and use a studio for the past two years and I can see with such clarity how invaluable the SET Lewisham space has been for myself and the fellow artists who have a studio here, not just to make work, but a place to safely keep their work overnight, grow and develop ideas and their professional practice. The building is ideal for various artistic practices because it has lots of natural light, hardwood floors, and high ceilings, primarily based on ground level for easy access and transport; these features are truly incredible and impossible to find in London. There is also a regular team of cleaners who ensure it is looked after and maintained. It is also very useful and convenient that SET Lewisham is within 20-30 minutes of walking or bicycling from home for most artists and has subsequently connected the artists and studio more closely to the local businesses and community of Lewisham. As part of the building, there is a project space which has also been fruitful for artists to make new and ambitious work, as well as present free exhibitions of contemporary art, injecting new energy and vitality into the community of Lewisham and individuals from the art community, who can easily access the space within 15 minutes of public transport. This project space has also become increasingly collaborative and interdisciplinary, hosting performance art, dance, music, screenings, poetry readings, creative and educational workshops, a guest curated residency programme and other free, live events for the community of Lewisham and aligned with Lewisham's greater vision as it prepares to host the London Borough of Culture 2022. There is a constant fear among artists in metropolitan cities such as London that their studio building will close down only after a few years or even months after opening and made into residential housing or mixed use. This fear not only inhibits the creative spirit but diminishes the capacity for an individual to authentically pursue a creative practice and professional career. The reality is this fear is true and the proposed Local Plan is a stark reminder and call to action that spaces like SET			

		Lewisham, despite how obviously valuable they are to the community of Lewisham and the greater art community, are vulnerable and can not be taken for granted; we must secure this space and work our hardest as a community to ensure it is not destroyed and lost forever. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LCA	**1. Do you have any comments on the proposed vision?** The council need to be MUCH more ambitious and focused on transforming the borough to meet its own sustainability targets and climate emergency declaration. 80% sustainable transport will not be met unless the focus is heavily on cycle routes and walking and truly transforming the borough to make cycling and walking more viable than driving. Lead with cycle routes in mind as a priority and plan from there. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set out clearly in Part 2 Transport policies. The Local Plan supports and seeks to promote cycling through the Healthy Streets Approach (see the Part 2 Transport policies for further details). It also includes detailed policies around the Lewisham Links, which involve proposals around a connected network of strategic walking and cycle routes. The identification of new and improved public realm / cycle infrastructure is set out in the Infrastructure Delivery Plan, which is a companion document to the Local Plan.	No change.
3	LCA	**1. Do you have any comments on the proposed vision?** Overall I support the general vision and direction of the proposals **2. Do you have any comments on the proposed key objectives?** I support them **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LCA3: Catford major centre and surrounds **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** 23 Land and Rushey Green and Bradgate Road (aldi)	0	Support for vision noted. In terms of amenity, the draft Local Plan Part 2 sets out specific policies addressing the protection of local amenity. These 'development management' policies must be read alongside site allocation policies. Any future development proposal for the site will be required to assess and demonstrate that impacts on amenity have been avoided and/or appropriately mitigated. Draft Local Plan policy QD1 strongly encourages developers to engage with residents and others likely to be affected by development proposals. This may provide an opportunity to feed into the detailed designs for any future development. Otherwise, there will be opportunities for the public to comment on proposals	No change.

		6. Please provide your comments on the site allocation(s) selected above. 23 Land at Rushey Green and Bradgate Road (Aldi) - I am very concerned that there isn't a stronger statement and underlying commitment to enforce proposed policy QD11 Infill and backland sites, back gardens and amenity areas specifically "Do not result in harmful overshadowing or overlooking, or otherwise adversely impact on the amenity of neighbouring properties, including their rear gardens, or the occupiers of the development, having regard to other Local Plan policies" There is a poor precedent from 17 Scrooby street in allowing this to occur and more needs to be done to balance the clear opportunity to improve and better utilise the Aldi site, with protecting the amenity and privacy of the exiting homes and gardens. This is a really good opportunity to get something right, but could go horribly wrong if mis-handled. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** I think this is good opportunity for deep community engagement and participative design workshops because it is a specific site with very local impacts that people can understand in real terms, rather than strategic planning which is harder to grasp.		through the planning approval process. Further information is set out in the Council's adopted Statement of Community Involvement.	
3	LCA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LCA2: Lewisham major centre and surrounds LCA3: Catford major centre and surrounds **4. Please provide your comments on the topic(s) selected above.** **- Do not destroy Catford in the same way as Lewisham Centre has been destroyed.** - Lewisham Centre is awful: Surrounded by a busy road without any cycle lanes, pedestrians still have to cross the busy road to get from the shopping area to the station, the height of the buildings will make it a drafty, dark and oppressive area. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	Noted. The draft Local Plan acknowledges the issues of vehicular dominance in Lewisham town centre, along with the need to improve the public realm to encourage and enable movement by walking and cycling in the town centre area. It sets out specific details to address these through the Part 3 area-based policies and site allocations. The draft Local Plan, Part 2 sets out policies for managing building heights. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
3	LCA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** No	0	Noted.	No change.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below None selected **4. Please provide your comments on the topic(s) selected above.** N/A 5. **Do you have any comments on the proposed site allocations? Select the site(s) and comment below**. None selected 6. **Please provide your comments on the site allocation(s) selected above**. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LCA	**1. Do you have any comments on the proposed vision?** Not clear that the detail squares with the vision **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	Noted. It is unclear from the comment which particular part(s) of the policies are inconsistent with the vision.	No change.
3	LCA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.**	0	The site is in a highly accessible location and suitable for high-density redevelopment. However we recognise that there are sensitivities regarding adjacent residential properties and any proposals that come forward will have to demonstrate a suitable relationship and transition in scale.	Site allocation amended to reduce indicative capacities and to reflect the A21 development Framework.

		N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Land at Rushey Green/ Bradgate Road **6. Please provide your comments on the site allocation(s) selected above.** I am unhappy with the proposal to allocate Land at Rushey Green/Bradgate Road for potential development of 119 residential units, as this is massively disproportionate to the size of the land available, would be a very high building surrounded by small Victorian terraced houses so out of scale to the surrounds, greatly increase traffic along Bradgate Road and put massive strain on local services which are already oversubscribed. It would have a huge adverse affect on our local area. Already having Aldi car park entrance on Bradgate road and the recent closure of surrounding roads to incoming traffic has already had a terrible affect on levels of traffic on Bradgate Road which is used by many many children and families attending Holbeach School **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Any future residential development should be 2-storey in line with the surrounding buildings and residential location. The car entrance to Aldi should be relocated on the main Rushey Green Road, and/or the first section of Bradgate Road should be closed to traffic beyond the car park entrance.			
3	LCA	**1. Do you have any comments on the proposed vision?** Please don't ignore the A205 Stansted Road parade of shops (nos 294-341) which is a real trouble spot and totally NEGLECTED. There is high pollution due to bad traffic on A205. Traffic flow must be improved. Please don't ignore us just before we sit on the border between two wards, we are always forgotten! **2. Do you have any comments on the proposed key objectives?** Aim 3: Secure the re-routing of the South Circular (A205) to enable the comprehensive regeneration of Catford major centre, and reinforce its role as the Borough's main civic and cultural hub. Please don't ignore the A205 Stansted Road parade of shops (nos 294-341) which is a real trouble spot and totally NEGLECTED. There is high pollution due to bad traffic on A205. Traffic flow must be improved. Please don't ignore us just before we sit on the border between two wards, we are always forgotten! **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** Please don't ignore the A205 Stansted Road parade of shops (nos 294-341) which is a real trouble spot and totally NEGLECTED. There is high pollution due to bad traffic on A205. Traffic flow must be improved. Please don't ignore us just before we sit on the border between two wards, we are always forgotten! **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.**	0	The Local Plan acknowledges the issues of air quality and congestion along the South Circular. It seeks to facilitate the transformation of A205 using the Healthy Streets Approach, including the stretch covering the Stansted Road parade. However, as a TfL road that is a major route, the Council will need to work with the GLA/TfL to deliver improvements, the specific nature of which will be considered on a case-by-case basis. In addition, the draft Local Plan proposes to designate 118 Stansted Road as part of a new Cultural Quarter. It is hoped that this will help to support the vitality and viability of the parade, which is in close proximity.	No change.

		None selected **6. Please provide your comments on the site allocation(s) selected above.** Please don't ignore the A205 Stansted Road parade of shops (nos 294-341) which is a real trouble spot and totally NEGLECTED. There is high pollution due to bad traffic on A205. Traffic flow must be improved. Please don't ignore us just before we sit on the border between two wards, we are always forgotten! **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Please don't ignore the A205 Stansted Road parade of shops (nos 294-341) which is a real trouble spot and totally NEGLECTED. There is high pollution due to bad traffic on A205. Traffic flow must be improved. Please don't ignore us just before we sit on the border between two wards, we are always forgotten!			
3	LCA	**1. Do you have any comments on the proposed vision?** Dire **2. Do you have any comments on the proposed key objectives?** How will you ensure development at such a huge scale will have services and facilities to cope with the influx of population - a population mix which will be unknown in age, gender, family structure, ethnicity etc What will be required from the point of view of transport, schools, health facilities, GP services, local open space overwhelmed, impact on sewage, water supply, delivery systems - it goes on. Where have these requirements been addressed? Has any attention been given to the fall in population over the London area? Well-documented by the ONS, and may be supported by the 2021 Census. What about the impacts, as yet unknown, in a post Covid 19 world? Lewisham has been a dormitory borough for years. It does not have the employment available to sustain this new population. Where will new residents work, how will they get there, will they only work from home? What are Lewisham council's pnas and policies on any of this? 3. **Do you have any comments on the proposed approaches for the area?** Select topic(s) and comment below LCA4: A21 corridor LCA3: Catford major centre and surrounds **4. Please provide your comments on the topic(s) selected above.** LCA3, plans for the south circular re-routing are mad. The chaos and congestion resulting will make daily life for local residents unsupportable, a livingn hell. Lewisham council has spent the last 30/40 years destroying the Catford Centre. When I was a girl it was a decent, pleasant place to be and shop. What is planned wil not restore that sense of decency and pleasantness. But then Lewisham council has destroyed central Lewisham - what was a decent , pleasant place to be. why would anyon go there? Only labour has been in control of the council for the last 30/40 years, look around you at your lack of achievement and destruction.	0	Noted. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure. The Local Plan covers a 20-year period. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues The draft Local Plan recognises that Lewisham has one of the lowest employment densities in London. It therefore sets out a strategy to increase the Borough's employment base and create a more inclusive local economy. Further details and policies are set out in Part 2 section on Economy and Culture. The re-routing of the South Circular is critical to delivering the comprehensive regeneration of Catford town centre. The Council has prepared the Catford Town Centre Framework and demonstrates that this scheme is feasible. The Council will continue to work with the London Mayor and TfL to support the scheme's delivery. The site allocations are necessary to demonstrate how the Local Plan will meet identified needs over the plan-period, including for new homes, workspace and jobs, community facilities and supporting infrastructure. Planning applications on site allocations within the plan will be considered through the planning approvals	Additional evidence base documents have been prepared to inform the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below. None selected **6. Please provide your comments on the site allocation(s) selected above.** What is the point? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** What about Leegate? And the other site allocations in the Lee Green area, which will also impact hugely on the residents of another borough. How is it that consultants for Galliards, officers and councillors pretend that 450 units are planned for Leegate, and then say, hang on, we would really like 630 units? The impact would be enormous and not sustainalbe. How dare the council try to trick residents		process, having regard to the Development Plan policies.	
3	LCA	**1. Do you have any comments on the proposed vision?** It would be in the best interest of the local residents that this does not go forward **2. Do you have any comments on the proposed key objectives?** I don't feel as though the plan should go ahead - there is already enough activity in the area **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** House on the Hill, Slaithewaite Rd **6. Please provide your comments on the site allocation(s) selected above.** I don't feel as though the plan should go ahead - there is already enough activity in the area **7. Are there any other issues and/or approaches for the area that you feel should be considered?** I don't feel as though the plan should go ahead - there is already enough activity in the area Aswell as problems with parking etc	0	Noted. It is imperative that the Council has an up-to-date local plan in place. The Local Plan must set out a positive strategy for delivering sustainable development in line with National Planning Policy Framework and the London Plan 'Good Growth' principles. The plan proposals set out an approach to sensitively managing growth and change, recognising that Lewisham is an inner-London borough and the central sub-area is predominantly within a London Plan 'opportunity area' where there is a strategic direction to focus new development and regeneration. We note your objection regarding the Site allocation on Slaithwaite Rd however this is a highly accessible site that is suitable for high-density development and could contribute to providing affordable homes for the borough.	No change.
3	LCA	**1. Do you have any comments on the proposed vision?** Very disappointed to see that there's no mention of how the local infrastructure, especially schools, would cope with the huge increase in residential properties. **2. Do you have any comments on the proposed key objectives?** N/A	4	Noted. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	Local Plan amended with additional details on the strategic priorities for the area west of Hither Green station. Local Plan amended to designate Hither Green Lane as a local centre, with amendments to the boundary of the centre.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below LCA£: Catford major centre and surrounds Staplehurst Road **4. Please provide your comments on the topic(s) selected above.** The cycle/footbridge over the railway is essential to the development of Catford. Without it, the safety of cyclists, pedestrians and families accessing schools from opposite sides of the tracks is compromised. To overlook this is negligent. Staplehurst Road being designated a local area is ridiculous and will further exacerbate community division triggered by the West side of Hither Green station bearing the brunt of negative effects of the LTN that protects the East, Lee, area. Hither Green Lane is the second longest road in the borough, provides access to a large primary school, Mountsfield Park, Woodlands surgery, multiple childcare settings, multiple parades of local shops, the train station and bus routes. Designating Hither Green Lane as a local area will improve equality of opportunity to those who live, work and are educated on the West side of the station as well as increasing its appeal to more independent businesses. Currently, the proposals to further improve Staplehurst Road give the impression of deliberately enhancing the health and well-being of one population group to the detriment of another which is unethical. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Ladywell Play Tower **6. Please provide your comments on the site allocation(s) selected above.** Please don't convert this to residential use. There is a lot of community support for it to be used as an arts and community venue. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** The area between Rushey Green/Lewisham High Street and Hither Green Lane is poorly represented by its councillors and is overlooked by these proposals. Where will children in this area be able to get primary school places if high rise developments are constructed locally?		At its meeting on 16th September 2020 Mayor & Cabinet agreed the transfer of S106 funding originally proposed for the delivery of a footbridge between Doggett Road and the Barratt's development on the former Catford Greyhound Stadium site to be used to deliver a programme of public realm and accessibility improvements to Catford Station areas. This includes looking at options to provide step free access at Catford Station. See M&C report for further details. The site allocation proposals for Ladywell Play Tower provide for main town centre, community and residential uses. The allocation is considered necessary to enable the restoration and the building and bring it back into viable use. The draft Local Plan includes policy proposals for the area to the West of Hither Green station, including site allocations. In response to Regulation 18 stage public consultation feedback, it is acknowledged that additional information on the strategic priorities for this area should be included in the plan. In response to Regulation 18 stage consultation feedback, officers have reviewed findings of the Local Centres Topic Paper (2020) with reference to Hither Green Lane. It is considered appropriate to extend the boundary of the parade north past Lanier Rd / St Swithuns Road, so that it includes St Swithun's Church to the east (and some additional retail units to the west). This will appropriately reflect the presence of a community anchor and provide for local centre status.	
3	LCA	**1. Do you have any comments on the proposed vision?** Many of these proposals are exciting and welcome, particularly the Borough's commitment to promoting pedestrian access cycling and public transport over private vehicles. However, as a resident of the area around Hither Green Lane, it's clear that this plan simply enshrines the areas current role as a corridor for traffic rather than the healthy neighbourhood its residents want. **2. Do you have any comments on the proposed key objectives?** Proposals for 'East Lewisham' give much attention to the Staplehurst Road and the Lee Green preservation areas. These neighbourhoods have already seen far more investment than Hither Green West. Hither Green Lane now has a fantastic range of pioneering local shops (plastic-free shop, Good Hope Cafe, Drink at Bobs). It is a 15-minute neighbourhood in the making and at least as deserving of attention and investment as leafy Lee. Please give attention to this area. Hither Green Lane is not	9	Noted. The draft Local Plan includes policy proposals for the area to the West of Hither Green station, including site allocations. In response to Regulation 18 stage public consultation feedback, it is acknowledged that additional information on the strategic priorities for this area should be included in the plan. The Council will work with the Mayor of London and TfL by exploring feasibility of design options for the re-routing the South Circular. It will also work with TfL to secure funding and facilitate delivery of the project, working also with other stakeholders. The Local Plan supports and seeks to promote walking and cycling through the Healthy Streets Approach (see	Local Plan amended with additional details on the strategic priorities for the area west of Hither Green station. Local Plan amended to designate Hither Green Lane as a local centre, with amendments to the boundary of the centre.

		an A road and should not be serving this role. It needs far more care and investment than the hyper-gentrified streets to the East of Hither Green Station. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** I love the idea of making Lee High Road and the South Circular healthy streets. But we need plans and targets for such an ambitious proposal. How will the council work with TFL on this? Otherwise, this seems like a vague gesture. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected 6. Please provide your comments on the site allocation(s) selected above. The absence of anywhere close to Hither Green from the list of options is very telling! **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Expansion of LTNs across the Borough please.		the Part 2 Transport policies for further details). The specific nature of interventions will be considered on a case-by-case basis. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. However the designation of Low Traffic Neighbourhoods are outside the scope of the Local Plan.	
3	LCA	**1. Do you have any comments on the proposed vision?** Great plan. Wholeheartedly agree. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	Support noted.	No change.
3	LCA	**1. Do you have any comments on the proposed vision?** Absolutely fantastic and I thoroughly agree with it in its entirely. Mountsfield Park is fantand would benefit hugely from investment in additional facilities.	1	Support noted. The Council's Parks and Open Spaces Strategy 2020-2025 sets out further details on the priorities for	No change.

		2. Do you have any comments on the proposed key objectives? N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected 6. **Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		investing and improving these areas. This should be referred for further information	
3	LCA	**1. Do you have any comments on the proposed vision?** I think that the development of green spaces in catford is really positive but I'd like to see ideas about how to reduce congestion and increase safe cycling and walking on the main roads such as the south circular (which is also a residential road) as the new road layout woukd have the opportunity to have wide cycle lanes but seems to have been squeezed out. I'm confused by the inclusion of staplehurst road as a local hub as it is a handful of shops in one of the most affluent parts of lewisham which already benefit from other initiatives such as healthy streets and school streets whilst other larger local hubs with more difficulties with road safety and accessibility by foot and bike (hither green lane, Sangley Road, muirkirk road, Torridon road) . It seems strange to be looking at increasing accessibility only on the affluent entrance to the station, as if accessibility is not an issue on the (more socially diverse/economically deprived) west side of the tracks, with basics like a pedestrian crossing at the dangerous (and far busier) Torridon/brown hill road still not addressed **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** Hither Green Local Hub **4. Please provide your comments on the topic(s) selected above.** I'm confused by the inclusion of staplehurst road as a local hub as it is a handful of shops in one of the most affluent parts of lewisham which already benefit from other initiatives such as healthy streets and school streets whilst other larger local hubs with more difficulties with road safety and accessibility by foot and bike (hither green lane, Sangley Road, muirkirk road, Torridon road) have not been included in such initiatives and so are being left behind (which increases social divisions and inequalities). It seems strange to be looking at increasing accessibility only on the	5	Noted. The draft Local Plan includes policy proposals for the area to the West of Hither Green station, including site allocations. In response to Regulation 18 stage public consultation feedback, it is acknowledged that additional information on the strategic priorities for this area should be included in the plan. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set out clearly in Part 2 Transport policies. The draft Local Plan includes policy proposals for the area to the West of Hither Green station, including site allocations. In response to Regulation 18 stage public consultation feedback, it is acknowledged that additional information on the strategic priorities for this area should be included in the plan. A review of neighbourhood parades and local centres has been undertaken and used to inform the draft Local Plan – see Local Centres Topic Paper (2020) for further information. In response to Regulation 18 stage consultation feedback, officers have reviewed findings of the Local Centres Topic Paper (2020) with reference to Hither Green Lane. It is considered appropriate to extend the boundary of the parade north past Lanier Rd / St Swithuns Road, so that it includes St Swithun's	Local Plan amended with additional details on the strategic priorities for the area west of Hither Green station. Local Plan amended to designate Hither Green Lane as a local centre, with amendments to the boundary of the centre.

		affluent entrance to the station, as if accessibility is not an issue on the (more socially diverse/economically deprived) west side of the tracks, with basics like a pedestrian crossing at the dangerous (and far busier) Torridon/brownhill road still not addressed which essentially cuts catford south residents off from walking or cycling beyond the south circular. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Stapleton Rd **6. Please provide your comments on the site allocation(s) selected above.** I'm confused by the inclusion of staplehurst road as a local hub as it is a handful of shops in one of the most affluent parts of lewisham which already benefit from other initiatives such as healthy streets and school streets whilst other larger local hubs with more difficulties with road safety and accessibility by foot and bike (hither green lane, Sangley Road, muirkirk road, Torridon road) have not been included in such initiatives and so are being left behind (which increases social divisions and inequalities). It seems strange to be looking at increasing accessibility only on the affluent entrance to the station, as if accessibility is not an issue on the (more socially diverse/economically deprived) west side of the tracks, with basics like a pedestrian crossing at the dangerous (and far busier) Torridon/brownhill road still not addressed which essentially cuts catford south residents off from walking or cycling beyond the south circular. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Make changes to south circular to increase the safety of alternatives to car travel , e.g wider cycle lanes, pedestrian crossing at brownhill/Torridon junction. Have in mind that the south circular is also a residential road in catford south (e.g brownhill road is fully residential) so any changes that divert traffic from elsewhere (eg hither green and lee) has the impact of worsening air quality for residents on brownhill and surrounding areas		Church to the east (and some additional retail units to the west). This will appropriately reflect the presence of a community anchor and provide for local centre status.	
3	LCA	**1. Do you have any comments on the proposed vision?** Central Lewisham proposals including proposal for Connington Road and Tesco car park. WAY TOO MUCH HOUSING. This area has already become overdeveloped in completely the wrong way. When I first came to live in Lewisham centre there was one High rise block - City Bank. Over the last 10+ years it has become completely unrecognisable with huge tower blocks dwarfing life at street level. Who are these apartments for? They are completely unsuitable for families or for anyone who wishes to live on a human scale, in a connected, healthy environment. As we have been made aware of over the past years, these huge scale tower blocks can pose sever safety risks (Grenfell) and only add to isolation and lack of community in times of difficulty (Covid). We are all aware that London needs more housing but this is not the way to address the problem. The redevelopment of the Leithbridge estate off Lewisham Road is a prime example of poor planning with a lack of focus on the needs of residents. The number of homes rebuilt on the site has more than doubled, with four large tower blocks being	4	Noted. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study, which has identified Lewisham as a location that is suitable for tall buildings. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The London Plan sets out detailed requirements for tall buildings that development proposals must demonstrate compliance with. This includes visual, functional, environmental and cumulative impacts, and covers such considerations such as microclimate.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

		built, plus many more lower rise unit. Where are the new facilities to meet the needs of all these new residents? The schools, GP's surgeries, local shops and green spaces? Current advertisements on the new phase of this development offers apartments starting from 350K! The new proposal for Connington Road/Tesco car park now adds to the density and exclusivity being created in this area where over 300 new dwellings are being proposed Where are the open spaces for existing residents? Apparently open spaces are good for mental health! Are the planning team aware of this? Public spaces need to allow people (including children) freedom to relax and play. Sanitise strips of grass (the 'riverside walkway' by the Fizzy Living tower block next to Lewisham station) do not offer this freedom. Lewisham council PLEASE come and visit these areas, talk to the people who already live in these places. Have you recently walked through Lompit Vale or Thurston Road? Ask yourself if you would like to live in a wind-trap, surrounded by high rise towers. These developments are only storing up problems for the future. Look for better examples within the borough, such as the low rise flats with large open spaces next to Glass Mill leisure centre. Be Brave enough to make good choices for the people of Lewisham. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None Selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Conington Rd and Lewisham Rd (Tesco) **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		The draft Local Plan sets out that all new housing developments must meet the London Plan standards for indoor and outdoor amenity space and children's play space. Whilst recognising the need for new green and open spaces to support the population, a balance must be struck given the limited amount of land available for re-development. The draft Local Plan proposals broadly seek to enhance the value of existing parks, open/green spaces by securing their protection, improving their quality and public access to them. The plan also makes provision for new open/green space. For instance, on larger site allocations in the central area, the draft Local Plan includes requirements for the provision of new publicly accessible open space and for river restoration. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	
3	LCA	**1. Do you have any comments on the proposed vision?** The 'Hither Green West' campaign group are disappointed at the failure to recognise the essential role Hither Green Lane plays in providing a range of shops and services that meet the day to day needs of Hither Green residents, including places to meet and socialise nearby. It easily meets all the criteria for 'local centre' designation. Given this, and the higher social deprivation in Hither Green West compared to neighbouring areas (including the East side of the railway line), a 'local centre' designation for Hither Green Lane would help create a thriving local economy here that tackles inequalities and helps secure its long term viability. In addition, whilst all	173	The draft Local Plan includes policy proposals for the area to the West of Hither Green station, including site allocations. In response to Regulation 18 stage public consultation feedback, it is acknowledged that additional information on the strategic priorities for this area should be included in the plan. In response to Regulation 18 stage consultation feedback, officers have reviewed findings of the Local	Local Plan amended with additional details on the strategic priorities for the area west of Hither Green station. Local Plan amended to designate Hither Green Lane as a local centre, with amendments to the boundary of the centre.

		the retail units are currently occupied, designation would help to strengthen the Lane's vibrancy and assist diversification of the retail offer. The support and investment that comes with the 'local centre' designation would also help support nearby roads with significant commercial offers, such as Springbank Road. There are four parades of shops along Hither Green Lane's length - but specifically the section nearest the Coop supermarket consists of circa 27 ground floor retail units, including the Coop supermarket, several convenience stores, take-away food outlets, several barbers/hairdressers, a florists, a launderette, a dry cleaners, and two pharmacies (i.e more than Staplehurst Road, which has been proposed as a 'local centre'). There are significant health, education, leisure facilities and park within 250m of the Lane, including Woodlands Health Centre and the two pharmacies; Brindishie Green School, Park and Bright Horizons nurseries; and it is very close to Mountsfield Park (a park four times the size of Manor House Gardens and the focus of Lewisham People's Day) It has several community facilities which act as an anchor including Drink At Bob's bar, St Swithun's Church and its church hall, and the Woodlands Health Centre, Brindishe Green school and the park. A couple of large new cafes/restaurants will be opening soon. Its accessible location near Hither Green Train Station, all of which help preserve footfall and bring in visitors. It is also closer to, and on the same side of the railway line (unlike Staplehurst Road local centre) to the proposed new housing developments on Nightingale Grove and the Driving Test Centre. - All this clearly demonstrated Hither Green Lane should be a 'local centre' Given the limited scope for new housing development in Hither Green West (and its location between two major centres), the Plan does not explain how Hither Green West will not be left behind. The Plan should be explicit in how Hither Green West will secure significant public realm in improvements after decades of under investment - for example, new or enhanced footpaths or cycleways; road improvements; new street crossings and other safety measures; cycle parking; heritage-sympathetic street lighting and street furniture; new landscaping, tree planting and other green infrastructure such as pocket parks and squares, play areas; and new way-finding signage etc. The Plan should also focus attention on Mountsfield Park - at 32 acres it is one of the largest parks in Lewisham but has few facilities This needs significant investment and new infrastructure to be provided (such as cafes, public toilets, benches, picnic tables, outdoor gyms, tennis courts and other sports facilities, landscaping etc) if it is to meet the needs of the planned growth in population. The plan should state clearly how new leisure, green spaces and play areas will be created in Hither Green West. **2. Do you have any comments on the proposed key objectives?** The Plan notes the primarily residential nature of Hither Green, but is silent on how its residential and historic character can be reinforced, preserved, promoted and elevated into a truly "Healthy Neighbourhood". Hither Green West is the very definition of a "15 minute neighbourhood" but needs significant investment in public realm enhancements and infrastructure to realise this.		Centres Topic Paper (2020) with reference to Hither Green Lane. It is considered appropriate to extend the boundary of the parade north past Lanier Rd / St Swithuns Road, so that it includes St Swithun's Church to the east (and some additional retail units to the west). This will appropriately reflect the presence of a community anchor and provide for local centre status. The Council's Parks and Open Spaces Strategy 2020-2025 sets out further details on the priorities for investing and improving these spaces. This should be referred for further information.	

		The 'Hither Green West' campaign group would also like to see concrete proposals to transform Hither Green Lane into a truly 'healthy street' with public realm improvements that make walking, cycling and use of public transport safer and more convenient, and make it a more pleasant place to shop and socialise. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LCA1: Central Area place principles **4. Please provide your comments on the topic(s) selected above.** Maximise the potential of the railway station to the West of the railway, improve the arrival point to Hither Green West around the station, creating a new public plaza and enhancements to the public realm. Improve crossings to the Springbank Road station entrance. There are significant opportunities for more tree planting on roads and public spaces and to improve the public realm in Hither Green West, The car dominated South Circular bounds Hither Green West, detracting from the highly residential, characterful nature of the neighbourhood. There is an absence of sense of arrival into a residential area, especially at the entrances to Hither Green West from the South Circular, at Hither Green Lane, Torridon Road, Stainton Road and Laleham Road. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LCA	**1. Do you have any comments on the proposed vision?** All of these new high rise properties around lewisham make the area feel unwelcome and claustrophobic. These types of properties did not work in the 1960's and will not work now. It reeks of money making. No new schools or public service / health care facilities are being built - of course as they do not make money. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected	1	Noted. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study, which has identified Lewisham as a location that is suitable for tall buildings. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.

		6. Please provide your comments on the site allocation(s) selected above. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		policies include requirements for the provision of specific types of infrastructure.	
3	LCA	**1. Do you have any comments on the proposed vision?** Hopefully, Davenport Road will become a place again and not a South Circular relief road, a rat-run and a public race track. Hopefully, Davenport Road will become a quiet residential road safe for children tp walk home from school. Hopefully, pensioners will be able to get in and out of their cars without the ever-present danger of some wide-boy racer ripping the car door off. Whilst its nice to see that the little wiggly bit of George Lane as it runs past the top of Mountsfield Park is now off limits to HGVs, I suspect that these HGVs now use Springbank and Theodore Roads. Ad hoc solutions like this one just shunt traffic about. Please could the whole of Rushy Green Ward north of the South Circular and east of the A21, be designated as a residents only area, preventing through traffic. Local roads in this scheme would all become cul de sacs. **2. Do you have any comments on the proposed key objectives?** Place-based policies have to deal with through traffic, caused by Rat Running, and speeding. I've not seen a single speed camera on this road in 8 years. The current Speed Bumps are useless since drivers merely straddle them. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** See above **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Rat-Running in Davenport Road, and reckless speeding.	4	Noted. The comments and suggestions set out in the representation concern specific traffic management measures, which are generally outside the scope of the Local Plan. The comments will be passed on to colleagues in the Council's Transport service for their consideration.	No change.
3	LCA	**1. Do you have any comments on the proposed vision?** Services to support residents, both existing and future, need to be the priority. For example, where will key workers live? Will new schools and surgeries be built? Will there be increased social housing? **2. Do you have any comments on the proposed key objectives?** Will planning be open and transparent? For example, a major building proposal at The House on the Hill was given one notice on a lamp post and a three month time	0	The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	

		limit for comments during Lockdown. Is this typical? No doubt planners and developers are rubbing their hands with glee. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LCA1: Central Area place principles LCA2: Lewisham major centre and surrounds LCA3: Catford major centre and surrounds LCA5: Central Lewisham Links LCA4: A21 Corridor **4. Please provide your comments on the topic(s) selected above.** Local services have suffered a lot recently. Why is consultation so rushed and minimal? Is there an assessment of local environmental impact? Any provision for social housing? 5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below. House on the Hill, Slathewaite Rd 6. Please provide your comments on the site allocation(s) selected above. I oppose this development. 36 proposed residential blocks will strain local sewage and water services. Additionally, it's already hard to park in Limes Grove and Slaithwaite Road. With the new hotel opening soon, where will the new residents park? Increased traffic will also have a detrimental effect on the local environment. The existing property was supposed to be kept in public ownership and community use. Local services have suffered a lot recently. Why is consultation so rushed and minimal? Is there an assessment of local environmental impact? Any provision for social housing? 7. Are there any other issues and/or approaches for the area that you feel should be considered? Community development and services must be priority.		The Local Plan consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement (SCI). The procedures for commenting on planning applications is also set out in the SCI. An Integrated Impact Assessment has been carried out alongside the Local Plan, and used to inform it. The IIA includes considerations for Strategic Environmental Assessment and Sustainability Appraisal, in line with national planning legislation and policy. The draft Local Plan sets a strategic target for 50% of all new homes to be genuinely affordable housing, with affordability considered on the basis of local income levels. Further details are set out in the Local Plan Part 2 policies on Housing. We note your objection regarding the Site allocation on Slaithwaite Rd however this is a highly accessible site that is suitable for high-density development and could contribute to providing affordable homes for the borough.	
3	LCA	**1. Do you have any comments on the proposed vision?** I do not believe that the new high development will be more genuinely affordable to locals, built to higher environmental and conservation standards, and not be detrimental to existing greenery. The developments so far i central Lewisham have just been for the benefit of wealthy non residents from elsewhere including investors from abroad, why is it now that the new developments are proposed to be 50% genuinely affordable when this should have been the case all along and for years previously. Why has housing been allowed to be built with such poor standards of fire safety, insulation and energy saving in general when this should have been the case all along. You will need to prove to sceptical residents that this is not just another wheeze to increase building contractors profits while building smaller and smaller apartments that locals cannot afford to rent or buy. **2. Do you have any comments on the proposed key objectives?** A lot of lewisham does not feel green, the changes to roads have merely increased congestion and not reduced it. Further development will only increase congestion and decrease air quality.	0	Noted. The draft Local Plan sets a strategic target for 50% of all new homes to be genuinely affordable, with affordability measured on the basis of local income levels. This is a new policy approach which both recognises and responds to the situation where some types of housing products (i.e. intermediate products) may not be affordable to local residents. Whist the adopted and draft Local Plan set out targets and requirements for new affordable housing, national planning policy provides that proposals that do not meet these targets/requirements may be acceptable where the developer submits a viability assessment to justify the amount provided. The Local Plan includes a raft of new policies focussed on protecting and enhancing the network of open	No change.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below LCA1: Central Area place principles **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** House on the Hill, Slaithewaite Rd 6. **Please provide your comments on the site allocation(s) selected above**. I am concerned about a possible proposed development at the site 47 Slaithwaite Road, Lewisham, to build a 36 unit multi storey building. We already have a 6 storey hotel being built at the end of Morley/Slaithwaite Road, and this new development further risks destroying the character of the area. I am especially concerned about the loss of greenery that exists currently and the fact that a single storey building will replaced by a multi storey one. There seems to be no consideration given to locals views when building these multi storey buildings in the Lewisham, though they are all unwelcomed by the locals. I would be grateful if you could desist from your proposed development. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		spaces and green infrastructure in the Borough. Further details are set out in Part 2 section on Green Infrastructure, as well as the area-based policies in Part 3. In terms of traffic congestion and air quality, the Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set out clearly in Part 2 Transport policies. These policies will work in conjunction with the draft Local Plan policy on Air Quality. We note your objection regarding the Site allocation on Slaithwaite Rd however this is a highly accessible site that is suitable for high-density development and could contribute to providing affordable homes for the borough.	
3	LCA	**1. Do you have any comments on the proposed vision?** hi, i am not happy regarding the proposed 119 flats on bradgate road/aldi. it is far to many **2. Do you have any comments on the proposed key objectives?** to much housing and not enough input on existing infastrcuture **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Land at Rushey Green / Bradgate Road **6. Please provide your comments on the site allocation(s) selected above.** this is a shocking suggestion 119 flat on this site. the road and area is busy as it is with just as aldi. the amount of drug users in the area to. WOW. I understand the need for housing but there is other sites that can be used. i strongly object to this! **7. Are there any other issues and/or approaches for the area that you feel should be considered?**	0	The site is in a highly accessible location and suitable for high-density redevelopment. However we recognise that there are sensitivities regarding adjacent residential properties and any proposals that come forward will have to demonstrate a suitable relationship and transition in scale. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	Site allocation amended to reduce indicative capacities and to reflect the A21 development Framework.

		N/A			
3	LCA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LCA1 Central Area place principles **4. Please provide your comments on the topic(s) selected above.** We feel the height of buildings in this area is too high in some instances - nuance needs to be considered in line with Local Plan principles e.g. where heritage/ aesthetic should be safeguarded. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Church Grove Self-Build **6. Please provide your comments on the site allocation(s) selected above.** This is not a self build development, listing it as such is a misrepresentation and misleading. The development is misaligned with the local plan and its proposals; namely to sensitively intensify housing density whilst enhancing local character. The development does not respect nor enrich the heritage of the conservation area it immediately borders. The build has altered dramatically from what was originally proposed, reducing its positive environmental credentials and aesthetic impact. It is taller than that alluded to being permissible in QD4 of the Local Plan as the development is not of exceptional design and architecture, nor is it sensitive to the site's context, and it does not preserve or enhance the heritage setting. Effective consultation has not taken place with residents. Some objections have gone unanswered, others have not received adequate response to provide resolution. There are also outstanding concerns regarding safety of current and new residents. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	Noted. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study, which has identified parts of the Lewisham central area as locations that are suitable for tall buildings. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document. The draft Local Plan site allocation for Church Grove reflects the principles established by the unimplemented planning consent reference DC/17/104264. The development was consented prior to the publication of the Local Plan: Main Issues and Preferred Approaches document. The Council considers that the proposal qualifies as a self-build/custom-build product in accordance with the definition set out in planning legislation. The procedures for public consultation on planning applications are set out in the Council's adopted Statement of Community Involvement. The SCI also provides details for contacting the Planning Service in situations where the public believe that procedures have not been followed.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
3	LCA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LCA2: Lewisham major centre and surrounds	0	Noted. The Council has consulted landowners during the preparation of the draft Local Plan. The landowners of the Lewisham Shopping Centre, which comprises the majority of land within the corresponding site allocation, have indicated that redevelopment of the site deliverable within the plan-period, and has undertaken early stage public consultation on the future of the centre. Whilst recognising there are other landholdings within the allocation area, it is not	No change.

		4. Please provide your comments on the topic(s) selected above. N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Lewisham shopping centre **6. Please provide your comments on the site allocation(s) selected above.** The allocation for Lewisham Shopping Centre is too vague. It lacks vision and is ineffective and unsound. The red line includes a very extensive area, presumably in multiple ownerships. It is highly unlikely this area will be comprehensively redeveloped during the plan period as envisaged. There have been very few major redevelopments of this kind anywhere in the UK during the last 5 years and the proposed plan approach is harking back to the retail boom in the 1980/90s. Whilst the shopping centre is unattractive 1970 development it is still relatively successful and well occupied with good tenants. There is no commercial or customer benefit in redevelopment e.g. increasing space or value. Comprehensive redevelopment is clearly unviable. This site allocation should be sub-divided to focus on the areas that have a reasonable prospect of being redeveloped during the plan period. Three areas should be allocated rather than the entire areas as follows: 1. Lewisham House - which should be actively promoted for refurbishment and conversion to residential use. 2. block south of Primark/Lewisham Model Market/No 192-212 Lewisham - this block should be redeveloped for food/beverage/leisure/entertainment uses at ground floor with residential/and possibly office above. 3 Land north of Boots including the under-utilised/unattractive open space around Sailsbury Yard adjacent to Lewisham Shopping Centre, which should be identified for mixed use redevelopment and public realm improvements, again with residential on upper floors **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		considered that these will preclude the delivery of the site allocation. A masterplan will be required to be accompanied with any future planning application, and this must appropriately address the situation of multiple land ownerships.	
3	LCA	**1. Do you have any comments on the proposed vision?** Vision clear and relevant **2. Do you have any comments on the proposed key objectives?** Key objectives only answering partially to the vision. Great initiatives around transportation and environment but concrete cultural initiatives lacking. Lewisham is more than a traffic hub. Why are there no initiative around culture? More needs to be done to promote, highlight and retain Lewisham cultural richness but also to keep the community active and encourage exchanges. Let's make Lewisham the best place to live in London. Also local heritage needs to be preserved and should feature in the key objectives. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LCA1: Central Area place principles LCA2: Lewisham major centre and surrounds **4. Please provide your comments on the topic(s) selected above.**	2	Noted. The Local Plan is concerned principally with the development and use of land, and there is therefore limited scope for details on cultural initiatives. However the Local Plan does include provisions to ensure that new development and investment supports Lewisham's cultural heritage and related activities. The Local Plan broadly seeks to respond to and build on Lewisham's cultural diversity and local distinctiveness. This is set out in the objectives for the draft Local Plan, set out in Part 1 and reflected elsewhere in the plan. The vision for the Central Area makes reference to Lewisham centre being a focus of cultural activity. However it is acknowledged that this could also be emphasised in the key spatial objectives. The site allocation for the Lewisham shopping centre site provide for the retention and enhancement of the	Local Plan central area key spatial objectives amended to more strongly reflect importance of cultural activity in Lewisham town centre.

		Create a walking area in central Lewisham and make it more convivial with outdoors terraces, flowers, trees Food market needs to be refurbished or relocated for more space making sure it remains Lewisham market (Afro, Caribbean, Turkish,... food stalls) and as a consequence differentiate itself from other London markets London 1st international food centre could be created A new cultural centre could be opened with public speaking events, live gigs, art fairs, spaces for music/craft/dancing/cooking classes etc... to bring people together and make the most of the existing diversity **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Ladywell Play Tower **6. Please provide your comments on the site allocation(s) selected above.** Such a beautiful building that definitely needs to be kept. Please no residential. It could become Lewisham cultural hub with public speaking events, live gigs, art fairs, spaces for music/craft/dancing/cooking classes etc... to bring people together and make the most of the existing diversity Could be a great space for outdoor local festivals celebrating Lewisham council community as well. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Brandram road almhouses park would be great for outdoor local festivals celebrating Lewisham council community.		existing market as a central feature of the area. It also provides flexibility for a wide range of community and cultural uses to be incorporated into any future redevelopment. The site allocation proposals for Ladywell Play Tower provide for main town centre, community and residential uses. The allocation is considered necessary to enable the restoration of the building and to bring it back into viable use. Outdoor festivals are covered separately by licencing arrangements. The suggestions for future event sites will be passed along to colleagues within the Council's Housing, Regeneration & Public Realm Directorate.	
3	LCA	**1. Do you have any comments on the proposed vision?** You need to consider safety for women at night **2. Do you have any comments on the proposed key objectives?** You need to do more to enable women to feel safe at night particularly near the stations of Catford and Catford Bridge **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LCA3: Catford major centre and surrounds **4. Please provide your comments on the topic(s) selected above.** More needs to be done to improve the experience of people walking to and from the Catford stations **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Railway Bridge Catford **6. Please provide your comments on the site allocation(s) selected above.** I do not feel safe walking home from Catford Bridge station along to A205 to Forest Hill at night. The lighting under the Bridge is poor.	3	Noted. At its meeting on 16th September 2020 Mayor & Cabinet agreed the transfer of S106 funding originally proposed for the delivery of a footbridge between Doggett Road and the Barratt's development on the former Catford Greyhound Stadium site to be used to deliver a programme of public realm and accessibility improvements to Catford Station areas. This includes looking at options to provide step free access at Catford Station. See M&C report for further details. The draft Local Plan broadly seeks to enable the delivery of transformational public realm enhancements within and around Catford Town Centre, including improvements between the centre and the station.	Local Plan Part 2 policy on inclusive and safe design amended to include additional information on safety for women.

		7. Are there any other issues and/or approaches for the area that you feel should be considered? N/A			
3	LCA	**1. Do you have any comments on the proposed vision?** The proposed vision is laudible, however given the scale and the current budget and resource constraints within the council if half of what is envisioned is delivered I would be surprised. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** Hither Green LCA2: Lewisham major centre and surrounds LCA3: Catford major centre and surrounds **4. Please provide your comments on the topic(s) selected above.** Apart from re-hashing the same plans for Hither Green station approach area and the Driving Test Centre that have been around for a very long time already (c2006). There is nothing related to investment and regeneration of Hither Green Lane, Springbank or other local streets. We have had little to no investment in Hither Green. Our pavements are completely shocking, we suffer from significant pollution due to through traffic going to and coming from the South Circular. For the pedestrian crossings that we do have, they are dangerous. Speeding continues to be an issue. Crime is at unacceptable levels... Hither Green has been overlooked for any meaningful interventions by the council time and again and this "Local Plan" is no different and re-enforces this narrative that the council continually neglect us. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Driving Test Centre, Nightingale Grove Nightingale Grove and Maythorne Cottages **6. Please provide your comments on the site allocation(s) selected above.** These plans have been around since 2006 at least but yet very little has been done... What steps will the council take to move this ahead in a reasonable timeframe going forward rather than waiting another 15 years.... **7. Are there any other issues and/or approaches for the area that you feel should be considered?** This is far from a "local plan" for Hither Green and delivers very little in the way of improvements for this area. I would urge the council to think again and actually do something for Hither Green rather than words.	3	The Local Plan is required to meet the Tests of Soundness set out in the National Planning Policy Framework, including that it is effective (deliverable over the plan period). The Council has been engaging with landowners and developers to ensure the site allocations and other key proposals are deliverable. The Local Plan will not be delivered solely by the Council, but though a multi-stakeholder approach, including government bodies, landowners, developers, businesses and local communities. Part 4 of the Local Plan sets out further details on delivery. The draft Local Plan includes policy proposals for the area to the West of Hither Green station, including site allocations. In response to Regulation 18 stage public consultation feedback, it is acknowledged that additional information on the strategic priorities for this area should be included in the plan. In response to Regulation 18 stage consultation feedback, officers have reviewed findings of the Local Centres Topic Paper (2020) with reference to Hither Green Lane. It is considered appropriate to extend the boundary of the parade north past Lanier Rd / St Swithuns Road, so that it includes St Swithun's Church to the east (and some additional retail units to the west). This will appropriately reflect the presence of a community anchor and provide for local centre status. There are site allocations for the Driving Test Centre and Nightingale Grove in the adopted Site Allocations Local Plan. These are being absorbed into the new Local Plan, as they are considered to be sites suitable for redevelopment and which can support the spatial strategy. Ultimately, it is up to landowners to bring forward development on sites.	Local Plan amended with additional details on the strategic priorities for the area west of Hither Green station. Local Plan amended to designate Hither Green Lane as a local centre, with amendments to the boundary of the centre.
3	LCA	**1. Do you have any comments on the proposed vision?** 1. The whole 'Plan' appears predicated on a 19.7% increase in population, without considering the infrastructure implications ie a 19.7% increase in demand for schools, hospitals, open spaces etc. Thus it has no value.	0	The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the	No change.

		2, "Re-routing the South Circular, A205."The question is what part of the South Circular and to where?" Until this question resolved, nothing else can be determined. At best, all the remainder of the objectives are pious thoughts. The A205 is the one road around the South of London and which passes directly through the heart of Lewisham Central which is outside the immediately coming ULEZ. Thus this road is going to become even more crowded within 1 year. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure. The re-routing of the South Circular is necessary to enable the comprehensive regeneration of Catford Town Centre. The re-routing would involve a small section of the A205, around Catford Bridge and Rushey Green, to be set back to enable significant public realm improvements. The Catford Town Centre Framework should be referred for further information. The Council has and will continue to lobby the London Mayor and Transport for London to extend the ULEZ beyond the South Circular. However the current extent of the ULEZ is not considered to preclude the implementation of the Local Plan policies concerning the A205 and its transformation using the Healthy Streets Approach.	
3	LCA	**1. Do you have any comments on the proposed vision?** Just noticed the size of the car park at Lawrence House! How embarrassing for the council... or likely they do not see it this way given the fact that Lewisham council seem totally unconcerned about how far behind other boroughs they fall regarding provisions for pedestrians, cyclists and those relying solely on public transport in outer areas of the borough. I hope car parking spaces are not given free or discounted to people working in Lawrence house (other than the disabled etc). The area around Lawrence House is so well served by public transport - buses, trains, DLR, and so I cannot possibly see what the need is for this car park. Set an example and close the council office car park. Other people do not have the luxury of a car park, a car, or the good public transport as you've got in that part of the borough. Why not build some social housing on that land, kill two birds with one stone? **2. Do you have any comments on the proposed key objectives?** Is the car park near Lawrence House marked for redevelopment - it should be **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.**	3	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set out clearly in Part 2 Transport policies. Laurence House and the car park are included as a site allocation in the draft Local Plan. The site allocation is for mixed-use redevelopment, including residential uses. Any future development proposal will need to comply with the London Plan parking standards, and also taking into account the high levels of public transport access in the area. Rationalisation of the existing car park will need to be considered through the design-led approach.	No change.

		None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LCA	**1. Do you have any comments on the proposed vision?** I hope the council does not dismiss concerns regarding the proposed high density housing. Yes, we need to include provisions for many people in need of housing, but I do not believe the proposed high rises is the right way. There would be plenty of 1/2 bed flats. Too few houses, spaces with gardens. Don't we want to encourage families, not just young professionals? Shouldn't families in need be offered appropriate accommodation for their needs? In addition, there are simply too many floors in the proposed high rises. There was great opposition to the 21 floor block of flats in the new development by Catford bridge. Is this 'Friendly' marketing aimed at glossing over residents genuine and rightful concerns? **2. Do you have any comments on the proposed key objectives?** You are overestimating what can be achieved with high density housing and underestimating it's detrimental effects on the community. There needs to be more houses planned and lower rise blocks of flats. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	Noted. The Local Plan has been informed by a Strategic Housing Market Assessment (SHMA) which indicates a need for additional family sized homes in Lewisham. In response to this, the draft Local Plan includes provisions to secure a wide range of housing types. This includes, for example, policies on housing size mix and residential conversions (to protect family units). However, it is acknowledged that the plan could benefit from additional provisions around family housing. The draft Local Plan provides that all new housing development must meet the London Plan standards for internal and outdoor amenity space, as well as play space. In order to meet identified local needs for new housing, workspace and jobs, commercial floorspace, community facilities and supporting infrastructure the draft Local Plan aims to facilitate a carefully managed sensitive intensification of the Borough. This includes building to higher densities in appropriate locations, including major town centres and areas that benefit from good access to public transport, such as Catford and Lewisham. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study, which has identified areas in the Borough that may be suitable for tall buildings, and this includes parts of the 'central area'. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended to include a target housing size mix for affordable housing. Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
3	LCA	**1. Do you have any comments on the proposed vision?**	3	Noted. The draft Local Plan acknowledges the issue of poor air quality in the Borough and particularly around the South Circular. To help address this, the plan	No change.

		The south circular traffic and pollution problem needs sorting and improving. Concern about losing the character of the area and becoming Elephant Castle type of very hight unaffordable residential blocks **2. Do you have any comments on the proposed key objectives?** Preserving and improving Green spaces should be a priority. Keeping housing affordable for the BAME community so that we can keep the rich diversity and artist culture that make our Borough so vibrant **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected 6. **Please provide your comments on the site allocation(s) selected above**. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		proposals seek to facilitate the transformation of the South Circular using the Healthy Street Approach, set out in the London Plan. This includes policies which will allow for the re-routing of the South Circular at Catford to deliver transformational public realm improvements and enable the comprehensive regeneration of the town centre. The draft Local Plan broadly sets out protect and enhance the Borough's network of open and green spaces, whilst delivering biodiversity net gain. Further details are set out in Part 2 on Green Infrastructure and in the Part 3 sub-area section. Specific requirements for the provision of new publicly accessible open space are included in the site allocation policies. The draft Local Plan also acknowledges and responds to the issue of housing affordability. It sets a strategic target of 50% of all new homes to be genuinely affordable, and for affordability to be a measure linked to local income levels.	
3	LCA	**1. Do you have any comments on the proposed vision?** I think it would be great to see Catford get some love. But you've got to act quickly! There seems to be so much talking, and very little doing. You're never going to please everyone. Obviously dont ***** people who already live here, no one wants that. But I want to see some decent pubs and restaurants! Get the Catford Constitutional up and running again! Get that bar by the theatre going again! Tell the Ninth Life they should sort out their disgusting interior choices. I want to see more support for the artists studios in the area. The digital creative industries in London are about the only growing industries at the moment. People that work in them have the money to support the new businesses in the area. Why not support them more? Less red tape around the use of the old town hall. Just look at how The Bussey Building etc has transformed Peckham. The top floor of the Old Town Hall is fully decked out and hasnt been used in about a year and a half. Whats the hold up? It's also effecting the internet use on the floor below where I do my business, making me reluctant to return from working from home. **2. Do you have any comments on the proposed key objectives?** Get moving **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	1	Noted. The draft Local Plan broadly seeks to promote and enable the regeneration and revitalisation of Catford major centre to support its long-term vitality and viability. This is reflected in the spatial strategy for the Central area, the place policies and site allocations. The Council has prepared the Catford Town Centre Framework which has both informed the preparation of the Local Plan and help to support its delivery. The Framework reflects the Council's objectives to deliver new and improved workspace within the centre, including to support the creative, digital and cultural industries. The Council has secured £1.65m from the London Mayor's Good Growth Fund to sensitively restore the former Catford Constitutional Club.	No change.

		4. Please provide your comments on the topic(s) selected above. N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LCA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LCA3: Catford major centre and surrounds **4. Please provide your comments on the topic(s) selected above.** My only real concern is the height of many of the proposed residential blocks. I feel in order to maintain the character of the area that high rise blocks should be limited to the height of current surrounding buildings. Excessively high buildings do nothing to create positive community spaces. The developments around Lewisham DLR are soulless and I'd hate to see Catford centre and surrounding area become the same. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	6	Noted. The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs that Local Plans identify locations that may be suitable for tall buildings and to set parameters for building heights. The draft Local Plan has been informed by a Tall Buildings Study, which has identified Catford as a location that is suitable for tall buildings. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with additional details and requirements on building heights, informed by the Tall Buildings Study update.
3	LCA	**1. Do you have any comments on the proposed vision?** It's important for the area to develop and improve, but a balance must be struck to acknowledge and be sensitive to residents properties already in these areas. **2. Do you have any comments on the proposed key objectives?** No **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	1	Noted. The draft site allocation for the Driving Test Centre includes a development requirement specifying that proposals must protect and seek to enhance green infrastructure, including existing mature trees. The development guidelines also set out the proposals must respond positively to residential properties surrounding the site. However, provisions for tree maintenance are outside the scope of the Local Plan.	No change.

		4. Please provide your comments on the topic(s) selected above. N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Driving test centre, Nightingale Grove **6. Please provide your comments on the site allocation(s) selected above.** Our development backs directly onto the driving test centre, the trees which separate the land here ensure privacy but also allow a great range of wildlife. Guarantees for the continued maintaining of these trees would need to be made as this would also effect sightlines into people's homes who are already resident here. As a homeowner this would also have a negative effect on values. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** There would need to be greater understanding of noise impact and the proximity to current homes which all back onto the driving test centre.		Both the adopted and draft Local Plan include policies dealing with amenity. Any future development proposal would need to demonstrate that amenity impacts, including noise, have been appropriately considered and avoided/mitigated.	
3	LCA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected 4. **Please provide your comments on the topic(s) selected above**. N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** House on the Hill, Slaithewaite Rd **6. Please provide your comments on the site allocation(s) selected above.** It is really difficult to park on the adjoining streets and this site has space for resident parking. Please ensure that space is allocated for resident parking on-site. It would be good for the site remains single-storey so that people with mobility issues have a nice place to live. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	The site is a highly accessible site that is suitable for high-density development and could contribute to providing affordable homes for the borough. The site will be car-free or car-lite in accordance with the London Plan.	No change.
3	LCA	**1. Do you have any comments on the proposed vision?** Stop building tower blocks **2. Do you have any comments on the proposed key objectives?** N/A	6	The London Plan is clear that tall buildings have a role to play in meeting London's housing need. It sets out parameters for local plans to ensure tall buildings are appropriately managed, including the identification of areas suitable for tall buildings and the setting of threshold building heights. The Local Plan must be in	No change.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		general conformity with the London Plan. Part 2 of the draft Local Plan sets out policy proposals on building heights, which have been reviewed in the light of feedback received on the Regulation 18 stage consultation.	
3	LCA	**1. Do you have any comments on the proposed vision?** Leave it how it is **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected 6. **Please provide your comments on the site allocation(s) selected above**. What on earth does all this mean - you make it so ridiculously difficult to comment on anything **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Yes stop building tower blocks	4	The Council is preparing a Local Plan to ensure there is an up-to-date framework in place for managing growth and development over the long-term. A do-nothing approach is not considered to be feasible or consistent with the National Planning Policy Framework. The London Plan is clear that tall buildings have a role to play in meeting London's housing need. It sets out parameters for local plans to ensure tall buildings are appropriately managed, including the identification of areas suitable for tall buildings and the setting of threshold building heights. The Local Plan must be in general conformity with the London Plan. Part 2 of the draft Local Plan sets out policy proposals on building heights, which have been reviewed in the light of feedback received on the Regulation 18 stage consultation.	No change.
3	LCA	**1. Do you have any comments on the proposed vision?** Why are shops Hither Green Lane and Springbank Road not included anywhere in your proposal? Why is there no ambition or creativity invested in this part of Lewisham? **2. Do you have any comments on the proposed key objectives?** Always the same areas being invested in. If you've invested in it before and it hasn't worked sufficiently why are you proposing to invest in it again instead at looking at alternative areas in Lewisham?	6	The draft Local Plan includes policy proposals for the area to the West of Hither Green station, including site allocations. In response to Regulation 18 stage public consultation feedback, it is acknowledged that additional information on the strategic priorities for this area should be included in the plan. In response to Regulation 18 stage consultation feedback, officers have reviewed findings of the Local Centres Topic Paper (2020) with reference to Hither	Local Plan amended with additional details on the strategic priorities for the area west of Hither Green station. Local Plan amended to designate Hither Green Lane as a local centre, with amendments to the boundary of the centre.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below LCA1: Central Area place principles LCA2: Lewisham major centre and surrounds Hither Green **4. Please provide your comments on the topic(s) selected above.** Where are your proposals for west of the railway? **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Nightingale Grove and Maythorne Cottages Driving Test Centre, Nightingale Grove **6. Please provide your comments on the site allocation(s) selected above.** There is no detail re what you are proposing. Why are Nightingale Grove and Maythorne cottages now part of Staplehurst Road? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Hither Green west of the railway, neglected again.		Green Lane. It is considered appropriate to extend the boundary of the parade north past Lanier Rd / St Swithuns Road, so that it includes St Swithun's Church to the east (and some additional retail units to the west). This will appropriately reflect the presence of a community anchor and provide for local centre status. The draft Local Plan site allocations for Nightingale Grove, Maythorne Cottages and Driving Test centre set out land use principles and development guidelines, which any future planning application would need to comply with. The detailed nature of the mix of uses and development design will be considered through the planning approvals process.	
3	LCA	**1. Do you have any comments on the proposed vision?** Someone has suggested more investment in Lee. A significant amount has already been spent in Lee; Pavements, plant pots, gentrification etc. whilst other areas have not had a penny for years and years **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Noted. The Local Plan sets a long-term strategy for managing growth, development and new investment across the Borough. Further details for local neighbourhoods are included in Part 3 of the Local Plan, which sets out key strategic priorities for identified sub-areas.	No change.
3	LCA	**1. Do you have any comments on the proposed vision?** The plan for the A21 should also applied to the A20 and the regeneration of Lee Not enough green spaces in the plan 2. **Do you have any comments on the proposed key objectives?**	3	Noted. The overarching objective for the A21 is to transform it using the Healthy Streets Approach. The draft Local Plan also identified the A20 as a key corridor, however it is acknowledged that it could better reflect the Healthy Streets approach along it.	Local Plan amended to better signpost strategy to transform A20 using Healthy Streets approach, including in area spatial objectives and place principles.

		N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Lewisham Gateway Lewisham Shopping Centre Land at Engate Street Conington Rd Lewisham Retail Park, Loampit Vale Molesworth Street Car Park Conington Rd and Lewisham Rd (Tesco) Loampit Vale and Thurston Rd (Carpetright) **6. Please provide your comments on the site allocation(s) selected above.** Not enough green spaces and pedestrian areas **7. Are there any other issues and/or approaches for the area that you feel should be considered?** The plan for the A21 should also applied to the A20 and the regeneration of Lee		The Local Plan must demonstrate how it will help to meet identified needs new homes, jobs and workspace, commercial floorspace, community facilities and supporting infrastructure. Whilst recognising the need for new green and open spaces to support the population, a balance must be struck given the limited amount of land available for re-development. The draft Local Plan proposals broadly seek to enhance the value of existing parks, open/green spaces by securing their protection, improving their quality and public access to them. The plan also makes provision for new open/green space where possible. For instance, on larger site allocations, the draft Local Plan includes requirements for the provision of new publicly accessible open space, with major developments required to meet the target Urban Greening Factor.	
3	LCA	**1. Do you have any comments on the proposed vision?** There is no vision for Hither Green. Where are your proposals? **2. Do you have any comments on the proposed key objectives?** There are no objectives for Hither Green where are your objectives? 3. **Do you have any comments on the proposed approaches for the area?** Select topic(s) and comment below LCA1: Central Area place principles **4. Please provide your comments on the topic(s) selected above.** Lewisham Council has not considered Hither Green. Where are your proposals? **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Driving Test Centre, Nightingale Grove **6. Please provide your comments on the site allocation(s) selected above.** There should not be a driving centre here, it causes pollution. There should not be a driving centre here, it causes pollution. **7. Are there any other issues and/or approaches for the area that you feel should be considered?**	3	The draft Local Plan includes policy proposals for the area around Hither Green station, including site allocations. This includes policies which seek to secure public realm enhancements and improvements to the streetscape. In response to Regulation 18 stage public consultation feedback, it is acknowledged that additional information on the strategic priorities for this area should be included in the plan. In response to Regulation 18 stage consultation feedback, officers have reviewed findings of the Local Centres Topic Paper (2020) with reference to Hither Green Lane. It is considered appropriate to extend the boundary of the parade north past Lanier Rd / St Swithuns Road, so that it includes St Swithun's Church to the east (and some additional retail units to the west). This will appropriately reflect the presence of a community anchor and provide for local centre status. The site allocation proposals for the Driving Test Centre would allow for alternative uses to be delivered through the site's redevelopment.	Local Plan amended with additional details on the strategic priorities for the area west of Hither Green station. Local Plan amended to designate Hither Green Lane as a local centre, with amendments to the boundary of the centre.

		Address the apawling lack of maintenance of Hither Green streetscape. Maintain the pavements. Pavements in other wards are renewed and upgraded, why not in Hither Green?			
3	LCA	**1. Do you have any comments on the proposed vision?** This proposal just seems pie in the sky stuff, Lewisham council have a massive budget deficit at the minute so i'm not sure where the money will come from to actually do any of this. This proposal seems to forget that Hither Green exists. Apart from one small mention of the poor arrival to the west of the station there is no other mention of Hither Green at all. Springbank road and Hither Green Lane could be a great local hub if the council actually remembered it existed and invested some money in it. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Pedestrianisation of Springbank Road immediately opposite the station entrance. Would improve the sense of arrival straight away. Lobby network rail to improve access at hither green station and improve the appearance of the station. It honestly looks like it was lifted from a shantytown. Invest in hither green lane e.g public realm improvements and encourage businesses to the area. Investment	7	The draft Local Plan is required to meet the Tests of Soundness set out in the National Planning Policy Framework, including that it is effective (deliverable over the plan period). The Council has been engaging with landowners and developers to ensure the site allocations and other key proposals are deliverable. The Local Plan will not be delivered solely by the Council, but though a multi-stakeholder approach, including government bodies, landowners, developers, businesses and local communities. Part 4 of the Local Plan sets out further details on delivery. The draft Local Plan includes policy proposals for the area to the West of Hither Green station, including site allocations. In response to Regulation 18 stage public consultation feedback, it is acknowledged that additional information on the strategic priorities for this area should be included in the plan. In response to Regulation 18 stage consultation feedback, officers have reviewed findings of the Local Centres Topic Paper (2020) with reference to Hither Green Lane. It is considered appropriate to extend the boundary of the parade north past Lanier Rd / St Swithuns Road, so that it includes St Swithun's Church to the east (and some additional retail units to the west). This will appropriately reflect the presence of a community anchor and provide for local centre status.	Local Plan amended with additional details on the strategic priorities for the area west of Hither Green station. Local Plan amended to designate Hither Green Lane as a local centre, with amendments to the boundary of the centre.
3	LCA	**1. Do you have any comments on the proposed vision?** This is an grand proposition that is dependant on too many external dependancies to be feasible. It needs to be broken down into componant parts with litlle or no external (especial financial) dependancies. **2. Do you have any comments on the proposed key objectives?** They do not look like they can be delivered.	1	The draft Local Plan is required to meet the Tests of Soundness set out in the National Planning Policy Framework, including that it is effective (deliverable over the plan period). The Council has been engaging with landowners and developers to ensure the site allocations and other key proposals are deliverable. The Local Plan will not be delivered solely by the Council, but though a multi-stakeholder approach, including	No change.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** This is too much to consider..... **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		government bodies, landowners, developers, businesses and local communities. Part 4 of the Local Plan sets out further details on delivery.	
3	LCA	**1. Do you have any comments on the proposed vision?** The plan is illegible. The key on the plan does not align with the description. At least I hope it doesn't otherwise Lewisham Council is routing new A21 major traffic routes through Hither Green. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Driving Test Centre, Nightingale Grove **6. Please provide your comments on the site allocation(s) selected above.** There should not be a driving test centre here. It promotes driving and they drive round Hither Green West of the tracks, practicing, idling and creating pollution. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	5	The site allocation proposals for the Driving Test Centre would allow for alternative uses to be delivered through the site's redevelopment.	No change.
3	LCA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below**	3	Support noted. The draft Local Plan includes policies addressing amenity which will need to be considered together with those on the evening and night-time economy. The night-time economy policy includes a cross-reference to the amenity policy.	No change.

		None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** Lewisham Shopping Centre Lewisham Gateway Molesworth Street Car Park **6. Please provide your comments on the site allocation(s) selected above.** Broadly supportive of all proposals but have concerns on the implications of a nighttime economy on the residential streets surrounding Clarendon Rise car park. The fruit and veg markets should absolutely remain as long as it is self contained and uses purpose built spaces and facilities. The practice of using storage facilities, and the related delivery via commercial vehicles/forklifts, in residential areas (some quite a distance from the actual market) should be halted. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Believe this area lacks green spaces and what green spaces do existing are very fragmented. This should be considered in the building of any new developments.		The draft Local Plan and site allocations make clear that any future development proposals in Lewisham town centre must protect and seek to enhance the market. The Local Plan proposals seek to ensure that appropriate provision for the function of the market is made through the development design and masterplan process. This should help to alleviate the need for space on neighbouring residential streets. The need for new and improved green/open spaces, including links between them, is reflected in the area spatial objectives and policies. The draft Local Plan site allocations sets out specific requirements in this regard, including the new Lewisham Links policy. One of the key objectives set out is to secure enhancements to the River Corridors, particularly the Ravensbourne.	
3	LCA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LCA2: Lewisham major centre and surrounds LCA1: Central Area place principles LCA5: Central Lewisham Links **4. Please provide your comments on the topic(s) selected above.** Couldn't agree more with improving the permeability of Lewisham high street and environs to pedestrians and cyclists. Same goes for the route between Lewisham town centre and train station. Lewisham high street should be pedestrianised with road space give over to improved street scaling/tree planting etc 5. **Do you have any comments on the proposed site allocations? Select the site(s) and comment below**. Molesworth Street Car Park **6. Please provide your comments on the site allocation(s) selected above.** Concerned that potential development of multi story car park could push more vehicles to small car parks located in predominantly residential areas (e.g.	6	Noted. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set out clearly in Part 2 Transport policies. Lewisham shopping centre is located within a highly accessible area with excellent access to public transport. The amount of parking provision in any future redevelopment will need to reflect this, having regard to the London Plan parking standards. A Transport Assessment and parking strategy will need to be submitted alongside a planning application. Overall, a reduction in the amount of existing car parking is expected. The Council may in the future consider the need for parking controls in surrounding residential areas.	No change.

		slaithwaite road and Clarendon rise) detracting on these areas. Car parking should be located next to main arterial routes not in amongst residential housing. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LCA	**1. Do you have any comments on the proposed vision?** I see little mention in the proposal for the redevelopment of Hither Green, other than ' There is a poor sense of arrival to the immediate west of the train station with limited links across the railway. Opportunities exist for sensitive infill and high quality small sites development to 'reinforce' the existing local character'. **2. Do you have any comments on the proposed key objectives?** The proposed objectives make no mention of the urgent requirement for redevelopment of Hither Green as designated for Catford, Lewisham and surrounding areas, and reads as if Hither Green is non-existent There is no mention of redevelopment of Hither Green train station, which bears an uncanny resemblance to one in a third world country, with leaky roofs and stairs (God help you if you are disabled or have a suitcase!) leading to platforms that would test the stamina of Usain Bolt. It is 2021, we are 15-20 minutes by train to London Bridge - notice the difference between both stations! Transportation is woeful - we have the luxury of two buses going through Lewisham (181 and 225) which are usually packed by the time they get to Hither Green Lane, and the only other bus that serves the area is the 202 to Blackheath/Crystal Palace - the only destinations where taking two buses is not required. We do not have a post office, bank, department store (not even a Charity shop!). We have one large supermarket (Co-op), and a variety of other small stores. We deserve to be treated far better with regards to the infrastructure/facilities necessary to ensure a thriving community's prosperity. We should not have to travel to Catford or Lewisham for what we need or want, it should be right on our own doorstep. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** **What's on offer for Hither Green** **7. Are there any other issues and/or approaches for the area that you feel should be considered?**	9	The draft Local Plan includes policy proposals for the area to the West of Hither Green station, including site allocations. In response to Regulation 18 stage public consultation feedback, it is acknowledged that additional information on the strategic priorities for this area should be included in the plan. In response to Regulation 18 stage consultation feedback, officers have reviewed findings of the Local Centres Topic Paper (2020) with reference to Hither Green Lane. It is considered appropriate to extend the boundary of the parade north past Lanier Rd / St Swithuns Road, so that it includes St Swithun's Church to the east (and some additional retail units to the west). This will appropriately reflect the presence of a community anchor and provide for local centre status. The Council will continue to lobby and work with the Mayor of London / Transport for London, Network Rail and other stakeholders to deliver improvements in public transport infrastructure (such as station refurbishments) and bus services.	Local Plan amended with additional details on the strategic priorities for the area west of Hither Green station. Local Plan amended to designate Hither Green Lane as a local centre, with amendments to the boundary of the centre.

		REGENERATION OF HITHER GREEN			
3	LCA	**1. Do you have any comments on the proposed vision?** I don't understand what re-routing of the south circular entails. I do NOT support any plan that would ban dogs from rivers - Lewisham seems to be very anti-dog, and already the lake at Beckenham has an ugly fence all around to prevent dogs swimming - it is an OUTDOOR lake! Why is it OK to swim with ducks/water rats etc but not family dogs?? What if I want to take my kid AND my dog swimming?? Believe it not many families do want to do that. why not fence off a small amount of the far end and make that dog-friendly?? **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	The re-routing of the South Circular is necessary to enable the comprehensive regeneration of Catford Town Centre. The re-routing would involve a small section of the A205, around Catford Bridge and Rushey Green, to be set back to enable significant public realm improvements. The Catford Town Centre Framework should be referred for further information. The Local Plan does not propose policies concerning dog walking. Any such restrictions are dealt by separate legislation, which is outside the scope of the Local Plan.	No change.
3	LCA	**1. Do you have any comments on the proposed vision?** Lacks ambition. To be honest you have done a terrible job in recent years. For pedestrians walking down from the railway station to the shopping centre it's simply vile. There are too many cars and everything is done to make life as difficult as possible for pedestrians, especially the lack of crossings at places convenient for pedestrians. It's all on its head. Pedestrians should be the priority not cars. It's all so grey and horrible. It lacks trees and greenery. Lewisham Gateway is vile too. Monolithic, oppressive tower blocks all crammed together. To be honest I avoid Lewisham centre as much as possible. **2. Do you have any comments on the proposed key objectives?** You really need to focus on pedestrians and limit traffic through Lewisham. You really need to green up. Plant lots more trees and hedges. Put in a central reservation down Lewisham High Street and fill it with greenery. Put in more pedestrian crossings at sites convenient for pedestrians to give them more priority and slow down and discourage the traffic. I really don't see how you will achieve your objectives of making Lewisham a place to go to unless you improve the environment for pedestrians. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below**	13	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set out clearly in Part 2 Transport policies. The Local Plan supports and seeks to promote walking and cycling through the Healthy Streets Approach (see the Part 2 Transport policies for further details). The Part 3 policies for the Central Area support these borough-wide policies. They includes site allocation policies with specific development requirements and guidelines for public realm enhancements.	No change.

		None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below.** None selected 6. **Please provide your comments on the site allocation(s) selected above**. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LNA	**1. Do you have any comments on the proposed vision?** Canal Approach I request that Lewisham Council prioritise reopening Canal Approach towpath, part of Deptford Parks Liveable Neighbourhood as a key strategic route for North Deptford. Play & School Routes Play does not feature as a priority North Deptford. Covid-19 has meant children in this high-density area have had little access to high quality play. Existing playgrounds are of low quality. The playground promised in 2014 alongside the £300k+ skatepark has not materialised. This should be delivered and other playgrounds across the area updates alongside safer streets and school routes. Prioritise a huge investment in playgrounds and safer streets for children. Polluting Industry Reduce the number of trucks coming to the area by changing the use class of industrial and waste processing sites like scrapyards and private waste processing. Support low pollution industries that create jobs for local people in healthy environments. SELCHP SELCHP is proposed as an integral part of the Local Plan. Waste incinerators are usually located in the most deprived neighbourhoods this is socially unjust. Furthermore, by 2035, incineration will be a more carbon-intensive process than even landfill. Remove SELCHP as a priority and shut it down so the borough can meet its climate emergency targets. New Riverside Park The population will grow dramatically due to 10k homes in the Evelyn Ward plus another 7k homes at Millwall and Canada Water. There is no plan to increase green space despite council documents stating the need to do so. Make delivering a new riverside park for Deptford on the protected wharf at Convoys Wharf a priority. **2. Do you have any comments on the proposed key objectives?** Canal Approach	2	Canal Approach – The Local Plan identifies this as a key strategic route for North Deptford highlighted in fig 15.2 and underpinned by the North Lewisham Links policy. The Council have been working with local groups as part of the Liveable Neighbourhoods Project to progress the scheme. Due to the financial challenges that TFL find themselves as a result of COVID-19 the project is having to be scaled back in terms of the scope. The details of which are currently being discussed. Play & School Routes - The Local Plan is underpinned by the Council's Parks and Open Spaces Strategy 2020-2025 which outlines the key priorities for improvements including many within the Deptford area. Lewisham Council has announced the revamp the play equipment in four popular Deptford parks. Evelyn Green, Sayes Court, Deptford Park and Folkestone Gardens will all benefit from refurbishments which are due to take place in the coming months. Polluting Industry – There are a number of areas in the north that are designated Strategic Industrial Land which are protected by the London Plan. It is therefore difficult for planning to limit the industrial uses on these sites however wherever possible we will try and ensure that these industries move away from heavy industrial uses such as scrapyards etc to more low pollution industries. SELCHP - The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the	No change.

		I request that Lewisham Council prioritise reopening Canal Approach towpath, part of Deptford Parks Liveable Neighbourhood as a key strategic route for North Deptford. Play & School Routes Play does not feature as a priority North Deptford. Covid-19 has meant children in this high-density area have had little access to high quality play. Existing playgrounds are of low quality. The playground promised in 2014 alongside the £300k+ skatepark has not materialised. This should be delivered and other playgrounds across the area updates alongside safer streets and school routes. Prioritise a huge investment in playgrounds and safer streets for children. Polluting Industry Reduce the number of trucks coming to the area by changing the use class of industrial and waste processing sites like scrapyards and private waste processing. Support low pollution industries that create jobs for local people in healthy environments. SELCHP SELCHP is proposed as an integral part of the Local Plan. Waste incinerators are usually located in the most deprived neighbourhoods this is socially unjust. Furthermore, by 2035, incineration will be a more carbon-intensive process than even landfill. Remove SELCHP as a priority and shut it down so the borough can meet its climate emergency targets. New Riverside Park The population will grow dramatically due to 10k homes in the Evelyn Ward plus another 7k homes at Millwall and Canada Water. There is no plan to increase green space despite council documents stating the need to do so. Make delivering a new riverside park for Deptford on the protected wharf at Convoys Wharf a priority. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** Lewisham Kinks is out of date. 2012. Come on. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		borough's apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. For the time being, the Local Plan must therefore continue to safeguard the site for waste management uses. New Riverside Park – The provision of new open space is identified within the draft Local Plan site allocations including new open spaces at Convoys Wharf. The Local Plan recognises that as an urban borough accommodating significant growth it is unfeasible to deliver large areas of new open space and instead the focus will be on improvements to the existing provision. The existing protected Wharf is protected at the London Plan level.	
3	LNA	**1. Do you have any comments on the proposed vision?** Some good ideas, but a lot of the info is vague & difficult to visualise	1	The Local Plan is a strategic policy document and whilst it does not deal with concrete proposals is underpinned by a number of Framework sand SPDs that provide a	No change.

		2. Do you have any comments on the proposed key objectives? I feel positive about the prospect of the Bakerloo line extension to New Cross Gate, but as a resident of Hatcham Park, I live in fear of you building residential properties on the site in a similar high-rise proposal to that of Sainsbury's recently. The station is a positive change, but increasing population-density in the area without facilities to support it would be unwise & have a negative impact on the current local neighbourhood. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LNA2: New Cross Road/ A2 corridor **4. Please provide your comments on the topic(s) selected above.** I feel positive about the prospect of the Bakerloo line extension to New Cross Gate, but as a resident of Hatcham Park, I live in fear of you building residential properties on the site in a similar high-rise proposal to that of Sainsbury's recently. The station is a positive change, but increasing population-density in the area without facilities to support it would be unwise & have a negative impact on the current local neighbourhood. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Former Hatcham Works, New Cross Rd **6. Please provide your comments on the site allocation(s) selected above.** I feel positive about the prospect of the Bakerloo line extension to New Cross Gate, but as a resident of Hatcham Park, I live in fear of you building residential properties on the site in a similar high-rise proposal to that of Sainsbury's recently. The station is a positive change, but increasing population-density in the area without facilities to support it would be unwise & have a negative impact on the current local neighbourhood **7. Are there any other issues and/or approaches for the area that you feel should be considered?** I feel positive about the prospect of the Bakerloo line extension to New Cross Gate, but as a resident of Hatcham Park, I live in fear of you building residential properties on the site in a similar high-rise proposal to that of Sainsbury's recently. The station is a positive change, but increasing population-density in the area without facilities to support it would be unwise & have a negative impact on the current local neighbourhood.		greater degree of clarity. Please refer to the Council website – planning policy for more details on Frameworks such as Catford Town Centre, New Cross Gate area Framework etc and SPDs such as the Small Sites SPD. The growth outlined within the Local Plan is not reliant on the delivery of the BLE but the Council strongly supports its delivery. There are other infrastructure improvements which shall be implemented to support growth and these are capture in the accompanying document the Infrastructure Delivery Plan. The indicative capacity for the Hatcham Works site is based on the New Cross Gate Area Framework. The Framework recognises that the site is in a highly accessible location within the district cenre and is suitable for high-density redevelopment. We do however recognise that New Cross Gate has many heritage assets and any future proposals will have to respond positively to these.	
3	LNA	**1. Do you have any comments on the proposed vision?** I'm not sure I agree that the high street of new cross is at the heart of community activity. It doesn't have a centre like Deptford and it would be good for the plan to recognise that and try to give it one! **2. Do you have any comments on the proposed key objectives?** Some of the objectives are too vague, for example what does turn the A2 into a healthy street mean in the context of a road which is a main artery into central London	2	The Local Plan is a strategic policy document and whilst it does not deal with concrete proposals is underpinned by a number of Frameworks and SPDs that provide a greater degree of clarity. Please refer to the New Cross Gate Area Framework for detail. We acknowledge that the A2 is a key arterial route and will continue to accommodate large volumes of traffic. However we still believe that improvements can be made to improve walking, cycling and public transport in line with TFL's heathy street guidance. This will not	No change.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below LNA2: New Cross Road/ A2 corridor LNA3: Creative Enterprise Zones **4. Please provide your comments on the topic(s) selected above.** How about including a plan for a creative zone in new cross to give it a central area for the community to come together. Something like the new catford mews or Deptford yard within the kender triangle or Sainsbury's redevelopment would positively impact the area and make people feel differently about the A2. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Besson Street (Kender Triangle) New Cross Siansburys redevelopment Former Hatcham Works, New Cross Rd Goodwood Rd and New Cross Rd **6. Please provide your comments on the site allocation(s) selected above.** Can we please do something other than try to shoehorn in as many tiny flats as possible into an already heavily built up area. And have some consideration for the neighbours. Building 12 storey blocks next to low rise housing is not acceptable. And why is the redevelopment at Sainsbury's new cross not mentioned when there are leaflets at the site talking about new plans in 2021 for 900 units? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Joined up cycle ways particularly around the new convoys wharf with a design/route that makes sense for the cyclist rather than the preference of the developer. For the Sainsbury's site how about some houses with gardens as affordable family homes and entertainment areas to bring in the adjoining neighbours. A cultural courtyard screened from the A2 and cafes with outdoor seating to create a nice vibe would be so beneficial; there are lots of good examples around London such as the redevelopment around kings cross or Deptford Foundry		impact on adjacent residential streets and any proposals will be tested thoroughly. Lewisham like all London boroughs is dealing with a housing crises and is required by the London Plan to accommodate 1,667 homes per annum across the plan period. We believe that locating these homes in our opportunity areas and town centres that have access to good public transport connections, local facilities and jobs is a sensible and sustainable approach. This approach also means that large areas of our suburban neighbourhoods and conservation areas can be conserved and enhanced. The Sites within New Cross and New Cross Gate are highly accessible and suitable for high-density housing. Cycleways – the Local Plan identifies key cycle routes throughout the borough underpinned by the Councils Cycle Strategy.	
3	LNA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Achilles Street	1	The consultation was carried out in accordance with our Statement of Community Involvement. We had unprecedented levels of engagement with over 1,400 respondents and thousands of comments. This represents one of the most successful Local Plan consultations in London.	The Local Plan Site allocation has been amended to reflect the 450 gross figure.

		6. Please provide your comments on the site allocation(s) selected above. Residents were not told about this consultation- why is a consultation that is so important taking place during a lockdown? The ballot that took place in 2019 excluded many residents. The small independent businesses who are part of the Achilles demolition proposals were also denied a vote. The Landlord offer that residents voted on included misinformation around the amount of social rent homes- Lewisham claiming that the housing charity Shelter classed LAR as social rent - Lewisham were asked to make a correction and remove this claim from documents in the public domain by Shelter- to date Lewisham have not done this. At the time of the ballot in 2019 the landlord offer claimed there would 450 new homes- the breakdown of tenure was 11% Social rent (these exist already) 24% LAR, 50% Private and the rest a mix of shared ownership and other unaffordable tenures- meaning Lewisham Council are not building new homes for social rent the majority of new homes will be private. The Local plan shows 651 new homes an increase of 201 added since the ballot with no indication on tenure. When plans to demolish the Achilles street area were first revealed in 2016 it was 300 homes. The homes and small businesses Lewisham council want to demolish are all structurally sound but have undergone a deliberate managed decline by Lewisham. No other option other than demolition was presented to residents. Residents repeatedly asked Lewisham council to explore and present options of retrofit/refurbishment as a genuine choice for residents but these requests were repeatedly ignored. Retrofit/refurbishment has much less negative impacts for communities including social and environmental impacts and displacement. The plan as indicated in the local plan shows a massive densification of the area- at present in the Achilles St area there are approx.91 homes as the plans to demolish the Achilles St area include private freehold property on New Cross Rd plus the demolition of Dean House halls of residence (only built about 20 years ago with Deptford city challenge money) and the small businesses on New Cross Road **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LNA	**1. Do you have any comments on the proposed vision?** This must be the 4th or 5th commonplace we have completed for North Deptford over as many years. None of the hundreds of comments residents have left on the previous commonplaces has been included in this proposal. Residents feel not listened to and that's why you won't have many comments on it. The consultation is closing today and you only have an handful of comments on here. Residents are being treated with contempt. What's the point of asking residents over and over if you're not listening to their answers? **2. Do you have any comments on the proposed key objectives?** What residents have been asking for over and over is a better area for walking and cycling with efficient infrastructures put in place to enable people to choose more active travel choices rather than driving. You keep talking about the 'industrial' heritage of the area and are failing to recognise that things have changed. This area is home to a lot of families and, as such, should have the infrastructure and money put in to make it a nice place to live. We need more parks and greenery. We need safe crossings and LTNs and we need for the area not to be treated as an afterthought and just someone to put more and more housing in.	5	The consultation was carried out in accordance with our Statement of Community Involvement. We had unprecedented levels of engagement with over 1,400 respondents and thousands of comments. This represents one of the most successful Local Plan consultations in London. Cycleways – the Local Plan identifies key cycle routes throughout the borough underpinned y the Councils Cycle Strategy. North area – The Local Plan contains specific policies for the area to the north including areas of change and investment. This includes improvements to open spaces, public transport and social infrastructure. The infrastructure to support growth is outlined in the supporting Infrastructure Delivery Plan.	No change.

		We are already providing the majority of the housing target for the whole of Lewisham and we're not seeing any improvements for it. Spend the money that developers have given you over the years on this area to make it more liveable. Go through the comments of the previous commonplaces and put a proper plan to serve the community. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** Not enough emphasis has been given in improving the north of the area. Evelyn is seeing the majority of the developments being built on it and none of the money spent to improve residents' lives. We need more parks, playgrounds, safe cycling and walking routes. We need you to stop looking at this area as the 'industrial' hub of Lewisham. That's in the past. We shouldn't have scrapyards and incinerators here. No other council would have such low regard to an area so close to central London. To invest in this area properly could be such a game changer for Lewisham but the plan lacks ambition on all levels. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** Why are parks not mentioned at all in the above? This should be number one priority together with safer walking and cycling routes. Slow down/ reduce the traffic and give people back their freedom to make healthier and more active travel choices. You're completely missing the point of this in your plan. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** More green links, more greenery, parks and playgrounds for our kids. Safer roads for walking and cycling. This plan lacks ambition on all levels.			
3	LNA	**1. Do you have any comments on the proposed vision?** Way too much development in the New Cross area. Scant/ no detail on practically what is being done to improve cycling provision. No detail on supporting infrastructure - ie schooling, transport, dr surgeries all of which are currently over crowded **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LNA2: New Cross / A2 corridor **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below**	3	Cycleways – the Local Plan identifies key cycle routes throughout the borough underpinned y the Councils Cycle Strategy. The Local Plan contains specific policies for the area to the north including areas of change and investment. This includes improvements to open spaces, public transport and social infrastructure. The infrastructure to support growth is outlined in the supporting Infrastructure Delivery Plan. Lewisham like all London boroughs is dealing with a housing crises and is required by the London Plan to accommodate 1,667 homes per annum across the plan period. We believe that locating these homes in our opportunity areas and town centres that have access to good public transport connections, local facilities and jobs is a sensible and sustainable approach. This	No change.

		Besson Street (Kender Triangle) Goodwood Rd and New Cross Rd Former Hatcham Works, New Cross Rd **6. Please provide your comments on the site allocation(s) selected above.** It is outrageous that you are proposing an additional 1300 units within the space of 1km in New cross thru development of kender, goodwood and hatcham goodsyard sites. There is no appreciation of the cumulative impact such dense development will have in a deprived area where there is a shortage of school places, nursery places, dr surgeries and over crowded public transport. Further- no specifics on improvement in cycling provision in the area or how this links to cycling networks to get anywhere. Assuming only 25% of these units will own one car that amounts to 250 additional vehicles- where will they go given no parking provision for any of these developments? The height and scale of these developments are utterly out of keeping with hatcham and telegraph hill conservation areas. There are already issues with traffic in the area which will only get worse with further over development. Further- previous applications for these sites have been unclear how bakerloo redevelopment will be managed with hatcham goods yard site redevelopment. It would be a disaster is we end in with high rise **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Details and specifics on how improvement on schooling, nursery provision and health care - why is there no detail on this? You say it is a climate emergency yet on cycling- no specifics on how you will address this on A2 / queens road. This is j. Your gift to do today and fact nothing has been done suggests again this is hot air from the council but no concrete action. Current parks int the area have become crowded- yet no specifics / admission that further large scale development will put further pressure on these limited resources.		approach also means that large areas of our suburban neighbourhoods and conservation areas can be conserved and enhanced. The Sites within New Cross and New Cross Gate are highly accessible and suitable for high-density housing. All of these sites will be car-free in accordance with the London Plan parking requirements.	
3	LNA	**1. Do you have any comments on the proposed vision?** Too much housing for investment no green space left **2. Do you have any comments on the proposed key objectives?** yes ..too greedy **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Albany Theatre **6. Please provide your comments on the site allocation(s) selected above.** The only really working class rooted cultural established centre and you want to redevelop t and half the garden.	2	Lewisham like all London boroughs is dealing with a housing crises and is required by the London Plan to accommodate 1,667 homes per annum across the plan period. We believe that locating these homes in our opportunity areas and town centres that have access to good public transport connections, local facilities and jobs is a sensible and sustainable approach. This approach also means that large areas of our suburban neighbourhoods and conservation areas can be conserved and enhanced. The site allocation makes clear that the theatre has to be reprovided as part of any proposal coming forward. These plans are necessary to secure the long term future of the theatre.	No change.

		you have no sense of community in suggesting this . **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LNA	**1. Do you have any comments on the proposed vision?** Proposed development of sainsburys site and good wood site in new cross bring way too many units into a deprived area where the infrastructure is already stretched. **2. Do you have any comments on the proposed key objectives?** This is way too much density in an already congested and deprived area. It would tower over lower density housing in hatcham conservation area and telegraph hill **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LNA1: North Area place principles LNA2: New Cross Road/ A2 corridor **4. Please provide your comments on the topic(s) selected above.** Where are the gp surgery places? What about schooling and nurseries? No capacity on trains or overground at peak times. Cumulative impact of these plus other developments is too much **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Former Hatcham Works, New Cross Rd Goodwood Rd and New Cross Rd **6. Please provide your comments on the site allocation(s) selected above.** This is way too much density in an already congested and deprived area. It would tower over lower density housing in hatcham conservation area and telegraph hill **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Where are the gp surgery places? What about schooling and nurseries? No capacity on trains or overground at peak times. Cumulative impact of these plus other developments is too much	2	Lewisham like all London boroughs is dealing with a housing crises and is required by the London Plan to accommodate 1,667 homes per annum across the plan period. We believe that locating these homes in our opportunity areas and town centres that have access to good public transport connections, local facilities and jobs is a sensible and sustainable approach. This approach also means that large areas of our suburban neighbourhoods and conservation areas can be conserved and enhanced. The Sites within New Cross and New Cross Gate are highly accessible and suitable for high-density housing. The Local Plan contains specific policies for the area to the north including areas of change and investment. This includes improvements to open spaces, public transport and social infrastructure. The infrastructure to support growth is outlined in the supporting Infrastructure Delivery Plan.	No change.
3	LNA	**1. Do you have any comments on the proposed vision?** You have destroyed a lot of the heritage and history of the area with the displacement of local communities, so I am not sure what it is you hope to retain. **2. Do you have any comments on the proposed key objectives?** The Albany should remain as a theatre, centre for local amenity and services. I am tired of seeing plans for high rise, mass density blocks. Tearing down Georgian and Victorian housing was the starting pint for many of Deptford's current problems. It is hard to believe when you see it now that it was like Greenwich at one point! Houses are needed not high rises. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	2	Lewisham has many heritage assets including 29 conservations areas and hundreds of statutory listed and locally listed buildings and structures. The Local Plan contains strong policies on conserving and enhancing these heritage assets. The site allocation for the Albany Theatre makes clear that the theatre has to be reprovided as part of any proposal coming forward. These plans are necessary to secure the long term future of the theatre.	

		4. Please provide your comments on the topic(s) selected above. N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LNA	**1. Do you have any comments on the proposed vision?** New Cross Gate Station crossing really dangerous..traffic always overlapping onto the crossing, and interupting bus lanes, cyclists ignoring redlights etc.. Too much building packed into Deptford area. New York on sea..if you can afford it. Hope all the units will be occupied and not left empty. Heavy taxes might help. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LNA2: New Cross Road/ A2 **4. Please provide your comments on the topic(s) selected above.** I left New Cross Station yesterday wanting t go towards News Cross Gate. Crossing the main road is impossible and their should be traffic lights with a pedestrian crossing. Otherwise you have to walk up past New Cross Inn and cross opposite Goldsmiths . This isn't possible for everybody and especially with luggage shopping etc.. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Improving the junction and removing the one way system will really slow down the traffic and there are a lot of heavy lorries using that route down to wards Deptford.especially on a Thursday for some reason	1	Lewisham like all London boroughs is dealing with a housing crises and is required by the London Plan to accommodate 1,667 homes per annum across the plan period. We believe that locating these homes in our opportunity areas and town centres that have access to good public transport connections, local facilities and jobs is a sensible and sustainable approach. This approach also means that large areas of our suburban neighbourhoods and conservation areas can be conserved and enhanced. The Sites within New Cross and New Cross Gate are highly accessible and suitable for high-density housing. Lewisham does not have an issue with empty homes and the houses that have been or are being built in Lewisham house existing and new residents. The Local Plan recognises that improvements to the A2 are required. This road is a ‘red route’ and in the ownership and control of TFL. Nevertheless we will continue to work proactively to bring about change and improve walking, cycling and public transport along the route.	No change.
3	LNA	**1. Do you have any comments on the proposed vision?** Yes. I have elaborate on them below. **2. Do you have any comments on the proposed key objectives?** There needs to be more in terms of green spaces and public realm strategy.	5	The Local Plan is underpinned by the Parks and Open Space Strategy. This is available on the Council website. We recognise the need to improve and maintain existing open spaces and the Local Plan sets out clear policy to achieve this.	Site allocation LNA 12 – Albany Theatre amended to make reference to the community gardens, Neighbourhood Open Space and the need to protect public realm.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below LNA1: North Area place principles Green Spaces **4. Please provide your comments on the topic(s) selected above.** Further direction ambition to be set out for the public realm improvement is needed. Green spaces and their maintenance are very important. These spaces are the future of our cities in the 'new post covid world. Gardens, Parks and spaces for relaxation for the adults are needed. New play areas now exist across the area and more needs to done for the children. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Albany Theatre **6. Please provide your comments on the site allocation(s) selected above.** Much is spoken about the cultural values in the Deptford. The reality is, The Albany is the only space that 'the average joe' could visit as a member of general public for arts. Laban Centre and Goldsmith are educational spaces performing teaching activities. The Albany needs to be handled with care and dignity rather than the heavy handed greedy approach currently taken by proposing to covert the space into a 120 flats with some semblance of a theatre. This approach is a travesty to the institution of arts, and an approach that wouldn't be taken anywhere else in the world. The theatre is boon for the area and should be developed into a cultural spot that becomes the pride of Deptford and indeed Lewisham. The open space that currently exists behind The Albany should be cherished and protected, its a local secret and a much-needed green area. By developing The Albany as a cultural hub, the market nearby is assured to be protected as a footfall from across London would be encouraged to visit the area. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Public Realm is rightly identified as an important part of the development. But a wholistic approach needs to be taken for the entire of New Cross, Deptford and North Deptford. The area currently reads disconnected and haphazard. Public Realm cannot be little tokens donated by the developers of the land, rather areas that inspire pride to the area. This can only be achieved with more incisive direction from the council. This is the approach taken at RBKC, Islington, Hackney and City of London, these London boroughs have shown that with greater direction from the council, better a public realm and green space can be achieved with developers held to account to deliver spaces of high standard. Maintenance of these spaces are equally as important.		The site allocation makes clear that the theatre has to be reprovided as part of any proposal coming forward. These plans are necessary to secure the long term future of the theatre.	
3	LNA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below**	4	The Local Plan is a strategic policy document and does not present specific proposals for individual sites. Any future proposal site allocations will be assessed against these policies and will be subject to public consultation as part of the development management process.	Site allocation LNA 12 – Albany Theatre amended to make reference to the community gardens, Neighbourhood Open Space and the need to protect public realm.

		LNA5: North lewisham Links **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Albany Theatre **6. Please provide your comments on the site allocation(s) selected above.** With specific reference to the redevelopment of the Albany Theatre - where is the vision? Where is the consultation? Who honestly thinks building flats on top of the theatre and taking up half the garden to build yet more flats is really what the community has asked for, wants or needs? Have any of the current tenants/local people been consulted? Is there no imagination to consider the effect of the pandemic and how this might free up office and retail sites that will no longer serve their original purpose and could be converted into housing? Where is the environmental advice to remove one of very few green spaces left in Deptford? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LNA	**1. Do you have any comments on the proposed vision?** Lacks any detail around residential streets. Would like to see more emphasis on greening residential streets/areas. Would also like to see the replacement of the existing ugly street lights with more appropriate Victorian period style lights as they have done in Greenwich and in the richer parts of the borough. **2. Do you have any comments on the proposed key objectives?** Most are too vague and unmeasurable. Objectives need timescales and measurable milestones which are independently assessed to ensure delivery. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LNA1: North Area place principles **4. Please provide your comments on the topic(s) selected above.** Needs to be greater emphasis on improving the state of Victorian housing. Maybe schemes to encourage home owners/landlords to improve the frontages of their properties. How about a scheme to link Lewisham college apprentices to local street by street housing improvements. Residents could get their homes painted/renovated; apprentices could gain experience and the whole area could be improved, boosting local pride. May also reduce crime. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Convoys Wharf MEL Timber Yard / Deptford Wharves MEL Neptune Wharf MEL **6. Please provide your comments on the site allocation(s) selected above.**	2	The Local Plan is a strategic policy document which sets out future growth and investment within the borough. Timberyard – Development stopped during COVID but will recommence shortly Convoys Wharf – the first sites have approved reserved matters and are being constructed now. Neptune Wharf – Construction has started.	Greater detailed introduced on retrofitting existing homes.

		What is the timescale for completing these schemes? Timber yard seems to have stopped, Neptune wharf and Convoys wharf have not even started. Council needs to intervene and either force completion of take away the planning consents. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LNA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** Hatcham Works Site **4. Please provide your comments on the topic(s) selected above.** This area is a peaceful haven and I would like it to stay as it is. The Sainsburys carpark will be the only one for miles to a large popular supermarket with convenient bus depot .The locals have an area with mature trees and some open space to breathe . Everywhere else is being lined with high rise dense concrete.This makes this space increasingly valuable. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	The London Plan directs Local Authorities to allocate surface carparks and single storey retail sheds for redevelopment and to make best use of this land. The indicative capacity for the former Hatcham Works site was informed by the endorsed New Cross Gate Area Framework. The site is a highly accessible site and suitable for high-density development.	No change.
3	LNA	**1. Do you have any comments on the proposed vision?** Overdevelopment in New Cross area/ Besson street triangle and in the borough as a whole. Much based on the assumption that people will continue to find dense London living attractive/ affordable especially with green spaces being squeezed out. The second assumption is that the Bakerloo line extension will .go ahead. **2. Do you have any comments on the proposed key objectives?** Lewisham is a great place to live with much historic structure and buildings having attracted people. Change this too much and the nature and spirit of the borough will change. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LNA2: New Cross Road/ A2 corridor **4. Please provide your comments on the topic(s) selected above.** Removing the gyratory a good idea..it worked well at Besson Street.	2	Lewisham like all London boroughs is dealing with a housing crises and is required by the London Plan to accommodate 1,667 homes per annum across the plan period. We believe that locating these homes in our opportunity areas and town centres that have access to good public transport connections, local facilities and jobs is a sensible and sustainable approach. This approach also means that large areas of our suburban neighbourhoods and conservation areas can be conserved and enhanced. The Sites within New Cross and New Cross Gate are highly accessible and suitable for high-density housing.	No change.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below Besson Street (Kender Triangle) **6. Please provide your comments on the site allocation(s) selected above.** Density too high. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LNA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected 4. **Please provide your comments on the topic(s) selected above**. N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Lower Creekside LSIS **6. Please provide your comments on the site allocation(s) selected above.** **Why has the DLR been left off so many of your plans?** Are you aware there is a Council Tax paying Community Interest group of residential boaters who form part of the Deptford Creek Conservation Area. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	Noted	Site allocation amended to include protection for Lewisham's boating community.
3	LNA	**1. Do you have any comments on the proposed vision?** The guidance in the main plan, page 624 for the southern end of Creekside nos,1-4 does not take into account the (council tax paying), vibrant multi-generational , long established houseboat community and its needs, or what it can contribute culturally. Any public access should be controllable and limited. This community was referred to as an important part of the character of the Creekside Conservation Area which is referred to in this plan. There seems to have been a lack of consultation with this community prior to the present draft. When Covid allows I'm happy to offer a trip on the creek to give planners an alternative perspective. **2. Do you have any comments on the proposed key objectives?** Regarding these sites the pre-decimal expression that leaps to mind is "quart in a pint pot". They are already intensively used, so to cram a net figure of 160 residential units as recommended in the draft seems a detrimental move and an overarching developer's charter.	2	Noted The Local Plan has a strong policy GR4 on Urban Greening and Trees which seeks to protect existing trees. It recognises that there may be occasions that trees have to felled however measures but be made to retain where possible and mitigate any unavoidable loss. Lewisham like all London boroughs is dealing with a housing crises and is required by the London Plan to accommodate 1,667 homes per annum across the plan period. We believe that locating these homes in our opportunity areas and town centres that have access to	Site allocation amended to include protection for Lewisham's boating community.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below None selected **4. Please provide your comments on the topic(s) selected above.** The council's declaration of a climate emergency seems at odds with the increased incidence of felling of mature trees. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected 6. **Please provide your comments on the site allocation(s) selected above**. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		good public transport connections, local facilities and jobs is a sensible and sustainable approach.	
3	LNA	**1. Do you have any comments on the proposed vision?** Lewisham seems to be building upwards but failing to maintain its current housing stock: where is the detail in the plans about the current stock and investment in its maintenance. Many lewisham homes residents are living in homes containing dangerous materials (cladding, asbestos) not to mention damp and leaking windows. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LNA1: North Area place principles LNA2: New Cross Road / A2 corridor **4. Please provide your comments on the topic(s) selected above.** There seems to be a lack of focus on green space in the New Cross development with a very large number of flats being built in a small area. Also concerns re accessibility for cycles and pedestrians and concerns regarding parking. Will these new flats be barred from having cars? How will this be achieved when the nearby conservation area does not have parking permits? Keeping the conservation area closed through traffic has to remain as part of the solution to this problem. Similarly, concerned regarding the heights of these apartment blocks which will dwarf the conservation area, which will drastically impact on the skyline and disturb the light of those living on the edge of the conservation area **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected 6. **Please provide your comments on the site allocation(s) selected above**. N/A	4	The maintenance of Lewisham Homes properties is not within the remit of the Local Plan. However we will pass your comments on to Lewisham Homes. Lewisham like all London boroughs is dealing with a housing crises and is required by the London Plan to accommodate 1,667 homes per annum across the plan period. We believe that locating these homes in our opportunity areas and town centres that have access to good public transport connections, local facilities and jobs is a sensible and sustainable approach. This approach also means that large areas of our suburban neighbourhoods and conservation areas can be conserved and enhanced. The indicative capacity for the former Hatcham Works site was informed by the endorsed New Cross Gate Area Framework. The Sites within New Cross and New Cross Gate are highly accessible and suitable for high-density housing. All of these sites will be car-free in accordance with the London Plan parking requirements.	No change.

		7. Are there any other issues and/or approaches for the area that you feel should be considered? N/A			
3	LNA	**1. Do you have any comments on the proposed vision?** It's just more of what we've seen in the last decade or 2: huge blocks of posh flats for offshore crime billionaires to hide their money. Rented out to young trendies from richer places, some of whom run trendy boutiques in the commercial units. Any community space like a nature garden is fenced off, patrolled by security guards & bulldozed. The 'development' is then built cheaply by economic migrants from Eastern Europe, who get priority for the jobs & remaining council housing, thus displacing locals, of whom there are virtually none left **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected 6. **Please provide your comments on the site allocation(s) selected above**. Albany Theatre has a beautiful nature garden with a polytunnel veg growing club & a patio adjoining the cafe. Why should it become a monster block of flats ? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	We do not recognise or agree with this assessment.	Site allocation LNA 12 – Albany Theatre amended to make reference to the community gardens, Neighbourhood Open Space and the need to protect public realm.
3	LNA	**1. Do you have any comments on the proposed vision?** No **2. Do you have any comments on the proposed key objectives?** No **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** No **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Former Hatcham Works, New Cross Rd	4	The Local Plan safeguards the Former Hatcham Works site for the delivery of the BLE. The indicative capacities for the site have been informed by the New Cross Gate area Framework that was endorsed by the Council. This sets out an indicative layout and massing that the Council feel is broadly acceptable. This will obviously be tested against the Local Plan policies when any proposal is brought forward.	No change.

		6. **Please provide your comments on the site allocation(s) selected above**. It is imperative that any planning permission for this site be conditional upon the delivery of a Bakerloo line station. The height of the buildings will need to take into account that the site is bordered to the south and the east by conservation areas. It is not enough to say that the 'tall buildings' will be in the centre of the site - views from both the Hatcham and Telegraph Hill conservation areas cannot be compromised. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LNA	**1. Do you have any comments on the proposed vision?** It seems quite ambitious which is good as good ideas always get whittled down. **2. Do you have any comments on the proposed key objectives?** What does the term "Genuinely affordable housing" mean ? **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LNA4: Thames Policy Area / Deptford Creekside **4. Please provide your comments on the topic(s) selected above.** The waterlink way could be suspended under both sides of the deck of the DLR. One side for pedestrian traffic and a separate one for cyclists. This would give users fabulous views of the Ravensbourne, the Creek and its environs whilst preserving space for the creative community and creek residents below. This could run, with intermediate access and egress all the way from Brookmill Park to Greenwich. The South facing sections could carry photovoltaic panels to power lighting and feed the grid providing a revenue to cover maintenance. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Convoys Wharf MEL **6. Please provide your comments on the site allocation(s) selected above.** Convoys Wharf is a development that seems separate from Deptford rather than integrated into Deptford. You only have to look at areas such as Nine Elms to see the woeful effects of "poor doors" and exclusion of the local established community. Developers should nurture and work with community initiatives. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** The declared climate emergency by LB Lewisham needs a massive increase in local employment allowing people to walk or cycle to work. Accommodation design needs to radically change to accommodate increased work from home rather than developers being allowed to build "units" at a minimum legal size.	1	Genuinely affordable is defined in the Local Plan as Social rent and London Affordable rent. Waterlink way – too detailed for the Local Plan but we will pass on your comments to our transport team. Convoys wharf – This site has a live, approved planning permission. The application was approved by the then Mayor of London, Boris Johnston against the wishes of the Council. The council will continue to work with the developer within the scope of the approval to engage with the local community. The Local Plan outlines policies to increase local jobs and includes an additional 40,000 m2 net employment floorspace over the plan period.	No change.
3	LNA	**1. Do you have any comments on the proposed vision?** This reads like Deptford is some sort of industrial heartland. It's not - it's densely built urban Zone 2 and the people living here now and future occupants of the new developments need quality green outdoor space, pedestrian-friendly high streets, and transport planning that's integrated with the immediate north	3	Disagree	No change.

		(Rotherhithe/Southwark) and south (Greenwich). Only 7/8/9 on the plan speak to the quality of life of people living here. An unfunded 30+ year away Bakerloo line is not our priority, nor is a private football stadium largely visited by residents of Kent. This is not an industrial estate, it's our home. **2. Do you have any comments on the proposed key objectives?** Insufficient priority given to green space **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LNA1: North Area place principles LNA5 North Lewisham Links **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected 6. **Please provide your comments on the site allocation(s) selected above**. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LNA	**1. Do you have any comments on the proposed vision?** Generally very good, particularly the bakerloo extension and the cycling routes. However, it's important to retain the identity of the area - allowing a loved pub (the White Hart) which was used by 1000s to be developed for use by 10s doesn't inspire confidence, for example. The creative hub and the green space sound great. **2. Do you have any comments on the proposed key objectives?** Important not to lose the view from Telegraph Hill. It's so rare to have that in London, and there should not be extensive high rises eg on the Sainsbury's site. Extending the Bakerloo line is much needed. During normal non-COVID times, the overground is massively overcrowded. I've lived all over London and the cycling route from Lewisham into central is the worst I've used. It's extremely dangerous to cycle down the Old Kent Road or New Cross Road - no paths, potholes everywhere. Surprised people haven't been killed. Lots of students live around here and cycling is very important for them (and the rest of us who want to cycle into central for work). Keep it green please, and wild. South London is so leafy and natural, which is rare for London. Would be such a shame to lose that to over-development and/or manicured green space. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	3	Support noted. The view from Telegraph Hill is recognised in the Local Plan as a key local view. Cycleways – the Local Plan identifies key cycle routes throughout the borough underpinned y the Councils Cycle Strategy.	No change.

		4. Please provide your comments on the topic(s) selected above. N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LNA	**1. Do you have any comments on the proposed vision?** Again the dependancy on the Bakerloo extension is too much of a dependancy; what would be the alternative? **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above.** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected 6. **Please provide your comments on the site allocation(s) selected above**. Too much to consider **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	The delivery of the Local Plan and the growth and investment is not predicated on the delivery of the BLE.	Further clarity is provided throughout Part 1.
3	LEA	1. Do you have any comments on the proposed vision? The vision represents a much needed regeneration of the area but the proposals by Galliard are for tower blocks that are far too high to be sympathetic to the landscape of the surrounding areas and risk becoming another blot in the landscape in 10 years' time 2. Do you have any comments on the proposed key objectives? See above 3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below	4	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

		LEA2:Lee Green district centre and surrounds 4. Please provide your comments on the topic(s) selected above? The vision represents a much needed regeneration of the area but the proposals by Galliard are for tower blocks that are far too high to be sympathetic to the landscape of the surrounding areas and risk becoming another blot in the landscape in 10 years' time 5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below Lee gate shopping centre Land at Lee High Rd and Lee Rd Sainsbury's Lee Green 6. Please provide your comments on the site allocation(s) selected above. The vision represents a much needed regeneration of the area but the proposals by Galliard are for tower blocks that are far too high to be sympathetic to the landscape of the surrounding areas and risk becoming another blot in the landscape in 10 years' time 7. Are there any other issues and/or approaches for the area that you feel should be considered? The quality of the commercial outlets needs to be carefully managed and appropriate levels of lighting and cctv are are must to ensure this is a safe zone for the large number of families in the area who already feel threatened by large groups convening in open spaces at all times of the day and night			
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre **6. Please provide your comments on the site allocation(s) selected above.** Having see Galliards plans, I have additional comments:	3	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

		1) they plan for small supermarkets to support 630 new homes. That means people will just packed Sainsburys Lee Green. 2) no additional parking for 630 new homes. Their only response to that is that people will be informed that they will get no allocated parking when they buy the flats. Well then they will park in our residential area. 3) They claim to be adding a north south walkway when in fact the current layout is more open and so you can easily access north south and they are removing existing east west link. They should show before and after plan in their brochure. Who cares about 2018 plan that is not going ahead. 4) What is going to happen to the small local store and charities? 5) The density of the building is an incredible change. We are just switching from one type of eyesore to another **7. Are there any other issues and/or approaches for the area that you feel should be considered?** 1) Bigger supermarket to support 630 new homes 2) parking and traffic and public transportation need to be addressed 3) reduce the density of the buildings to reduce immense pressure on public service, eg trains, schools			
3	LEA	**1. Do you have any comments on the proposed vision?** It is confused. Takes no account of past consultations from local residents **2. Do you have any comments on the proposed key objectives?** Height proposals of 15 storeys inappropriate. AFFIRDABLEFamily homes not flats required **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	4	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
3	LEA	**1. Do you have any comments on the proposed vision?** We live on Dallinger Road and are very concerned about the lack of transparency regarding the latest proposals for the Leegate Centre. Instead we have had to rely	1	The Local Plan consultation was carried out in accordance with our Statement of community Involvement.	Lewisham has updated it tall building evidence and the Tall Building policy has been amended accordingly.

		on emails from community groups to keep us informed as the council has sought to prevent the proposals being made fully public while the Local Plan consultation remains open. We understand that the current proposals - which have had no formal public consultation, merely informal consultation with a few selected groups - will now include almost 650 new homes with building heights reaching 15 storeys. This is completely inappropriate for the area and the council is setting a dangerous precedent for other proposed allocated sites in the Lee area. Lee Manor is an important Conservation Area and these proposals are not in keeping with the existing buildings. We appreciate something need to be done with this site - but it has to be done in a sympathetic way to the existing historic buildings. it is a strategic site and one that will have long term implications for those of us who live here. It also should not be used as precedent for other smaller sites which are in residential areas, in our case the Travis Perkins site which sits within a residential area on a residential road. Lewisham has looked at it's evidence and explicitly excluded Lee Green from it's Tall Building opportunity areas in its draft Local Plan. Yet Galliard Homes are proposing building up to 15 storeys high, exceeding maximum existing local height by 37%. This is against the wishes of the community as expressed in the Lee Neighbourhood Plan which has been widely consulted on. We would want to see the height of the new development reflect better the character of the historic buildings in Lee Green. Also there are no public proposals about how this development will affect the already highly congested crossroads at Lee Green. Thanks to bungled policies like LTN (with more to come when Greenwich close Weigell Road) - this crossroads is not only congested but highly dangerous - adding an additional 650 homes with the added car movements will exacerbate the problem and we note the Lee Forum says no funding has been allocated for Lee Green for infrastructure improvements, which seems highly short sighted give this is supposed to be a strategic site. Clearly no council officers or Councillors ever use this junction. We are also opposed to the redevelopment of the Sainsburys site as this will only make issues at Lee Green in terms of car movements, congestion and pollution worse. We would also oppose the council using the redevelopment of the Leegate to set a precedent for further 15 storey+ buildings on this site. We would be supportive of a sympathetic redevelopment of the Travis Perkins site and Citroen garage site - one which completed the street scene of Holme Lacey Rd in the same style of Victorian housing that currently exists and at the garage site, helps to complete the shop frontage around the station. However we fear that the council will simply allow a developer to build a huge block of flats, totally out of keeping with the area. **2. Do you have any comments on the proposed key objectives?** No we don't support the objectives - for reasons stated above - what's the point in consulting if the council is going to ignore it's own policy? **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds LEA1: East Area place principles		This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. The tall building evidence accompanying the Reg 18 consultation does suggest that Lee Green could be suitable for tall buildings albeit it recognises that there are sensitivities. Further work has been carried out to ensure our approach to tall buildings aligns with the now adopted London Plan. We note you objection to the redevelopment of Sainsburys – The London Plan directs Local Authorities to allocate surface carparks and single storey retail for redevelopment in order to make best use of available land within the capital. All development within Lee Green will be car-free or car-lite in accordance with the London Plan parking requirements.	

		LEA4: Linear network of green infrastructure LEA5: East Lewisham Links **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre Sainsbury's Lee Green Travis Perkins and Citroen Garage **6. Please provide your comments on the site allocation(s) selected above.** Not opposed to the redevelopment of Leegate centre in principle but it must be done with reduced heights - we fear the council is simply using the Galliard application as a way of creating a precedent for taller and inappropriate buildings on other sites in Lee. Opposed to Sainsburys site - together with the Leegate redevelopment it would cause total chaos to the Lee Green area - and given what the council has already done with LTN we would have no confidence in the council's competence to manage this. Not opposed to redevelopment of Travis Perkins and car showroom site, however this should be done sympathetically and it would be much better to complete Holme Lacey Road in the same style of housing as already exists rather than blocks of flats which would be totally out of keeping with the low height Victorian housing that currently exists. The car showroom site should be used to complete the shop frontage - not blocks of flats - and we agree that this would complement the existing commercial area around the station. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LEA	**1. Do you have any comments on the proposed vision?** N/A 2. **Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA5: East Lewisham links **4. Please provide your comments on the topic(s) selected above?** I strongly support this, and the proposal to de-culvert the Quaggy near Lee High Rd. Development of the East Lewisham Links proposal must minimise conflicts between pedestrians, cycles and motor traffic, with pedestrians and cycles prioritised at junctions to make the routes genuinely useful. Very careful thought needs to be given to the route in the centre of Blackheath village, which is currently too narrow and polluted for the number of people and the amount of traffic, and is horrific for cyclists. Closing Blackheath to through motor traffic except buses, would make more	1	Support noted. We will pass your detail comments onto our Transport team.	No change.

		space for pedestrians, a safe route for cyclists, and transform the polluted, cramped centre. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** Safe, direct cycling routes to and from Lee Green are desperately needed. The A20 east and west of Lee Green and the A2212 north and south of Lee Green need segregated cycle lanes. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre Sainsbury's Lee Green Land at Lee High Rd and Lee Rd **6. Please provide your comments on the site allocation(s) selected above.** I support the development and improvement of Lee Green, but it is important that (a) transport is improved (more buses and segregated cycle lanes), (b) safe, pleasant public space is created set back from the polluted junction, (c) shopping and facilities are retained and improvement, and (d) building heights are limited to the height of existing local buildings. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	3	We acknowledge that improving streets throughout the borough including within Lee Gate and Blackheath is important. We will continue to work with our transport colleagues and TFL to deliver this. The Local Plan is underpinned by a Transport Assessment and other key documents such as the Councils Transport Strategy and Local Implementation Plan.	No change.
3	LEA	**1. Do you have any comments on the proposed vision?** How can you hope to improve on the 'vision' of Blackheath, when it has a tailback up Lee Road from Tigers Head junction for a few hours each day, including the weekends? And this is only going to get worse if you build densely packed in tower blocks on the Leegate, BMW and Sainsbury sites? Blackheath an area with conservation areas and listed buildings looking down the hill on a dense ghetto being built to meet Lewisham's house building targets without any consideration to	4	We acknowledge that improving streets throughout the borough including within Lee Gate and Blackheath is important. We will continue to work with our transport colleagues and TFL to deliver this. The Local Plan is underpinned by a Transport Assessment and other key documents such as the	No change.

		those who have lived for many years in the area surrounding this development? You want to build communities in the area that bring joy not despair. **2. Do you have any comments on the proposed key objectives?** Re-establish Lee Green district centre as a welcoming and thriving hub of commercial and community activity. - How can it be welcoming when the buildings are packed in with hardly any green spaces and dark alleyways between the proposed towers? Deliver public realm improvements and high quality, mixed-use developments through the renewal of Leegate - High quality and densely packed housing are at distinct opposite ends of the spectrum in a housing development plan. No idea what you mean by public realm? Shopping Centre and other town centre sites. There is already a Sainsbury which we would like to keep with the car park. Shops and places such as art studios, yoga and keep fit centres are coming to the area directly due to the lower rents charged, which will force them out when Galliard starts charging high rents and the chain stores such as Starbucks arrive. Address the dominance of vehicular traffic at the centre's main junction. - Not sure how you will achieve this when Lee Green is consistently underfunded from the infrastructure budget, when trains and buses are already packed in preCOVID times. And if you bring in more than 450 new households and don't provide them with car parking they will still buy cars which will then cause more stress to local streets for traffic and parking. Maybe you need to invest in infrastructure not road blocks. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district and surrounds **4. Please provide your comments on the topic(s) selected above?** The proposal for 15 storeys is ridiculous. There is a severe risk of daylight and sunlight being blocked at the junction and buildings at Tiger's Head junction. The site will be totally out of keeping for the area, an area many of which are in conservation areas with listed buildings inhabited by families who stay for many years. It will cause a significant change to the skyline of the area which will be severely detrimental and not an enhancement in any way. This is not an area that can be compared with developments at Lewisham roundabout or Kidbroke and therefore a similar plan of dense tall buildings is distinctly inappropriate for the area.		Councils Transport Strategy and Local Implementation Plan. Much of this response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan.	

		The Lee green area cannot cope with the proposed increase in the number of housing units for a number of reasons: -Traffic already queues for lengthy periods at the junction, with queues half way up Lee Road at several times of the day including weekends causing increased pollution, and along Lee High Road to Sutcliffe Park. -Public transport is already at breaking limits with the trains pre-COVID resembling cattle trucks at the peak hours of the day. -Schools already have waiting lists. Until the plans include a primary school you cannot expect young families to be adequately served. In essence: Please make sure the height does not exceed those of the buildings currently in Leegate Include homes for elderly as well as young families Make sure the lead building is not at the north side blocking out light on the junction. The Sainsbury and BMW garage sites must be lower than that of the current low level buildings at Leegate. Improve the infrastructure available with more trains running through Blackheath and Lee. Include plans for an expansion of existing primary and secondary schools to accommodate more children without taking up more land. It is extremely upsetting to face the prospect of Lee Green looking like Lewisham roundabout. I cannot believe that Lewisham Council has not set out strict criteria already to stop wasting more time on this project, when so much should have been learnt from the St Modwen applications. Finally Galliard is well known for selling flats in Hong Kong and Asia to buyers at discount bulk prices who 'mothball' the flats. This in no way contributes to solving the lack of housing in Lewisham nor achieving the Mayor of London's housing targets. So I would also like an undertaking that all flats that are for sale should be sold in the UK via local agents to British residents. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre Sainsbury's Lee Green Land at Lee High Rd and Lee Rd **6. Please provide your comments on the site allocation(s) selected above.** The proposal for 15 storeys is ridiculous. There is a severe risk of daylight and sunlight being blocked at the junction and buildings at Tiger's Head junction. The site will be totally out of keeping for the area, an area many of which are in conservation areas with listed buildings inhabited by families who stay for many years. It will			

		cause a significant change to the skyline of the area which will be severely detrimental and not an enhancement in any way. This is not an area that can be compared with developments at Lewisham roundabout or Kidbroke and therefore a similar plan of dense tall buildings is distinctly inappropriate for the area. The Lee green area cannot cope with the proposed increase in the number of housing units for a number of reasons: -Traffic already queues for lengthy periods at the junction, with queues half way up Lee Road at several times of the day including weekends causing increased pollution, and along Lee High Road to Sutcliffe Park. -Public transport is already at breaking limits with the trains pre-COVID resembling cattle trucks at the peak hours of the day. -Schools already have waiting lists. Until the plans include a primary school you cannot expect young families to be adequately served. In essence: Please make sure the height does not exceed those of the buildings currently in Leegate Include homes for elderly as well as young families Make sure the lead building is not at the north side blocking out light on the junction. The Sainsbury and BMW garage sites must be lower than that of the current low level buildings at Leegate. Improve the infrastructure available with more trains running through Blackheath and Lee. Include plans for an expansion of existing primary and secondary schools to accommodate more children without taking up more land. It is extremely upsetting to face the prospect of Lee Green looking like Lewisham roundabout. I cannot believe that Lewisham Council has not set out strict criteria already to stop wasting more time on this project, when so much should have been learnt from the St Modwen applications. Finally Galliard is well known for selling flats in Hong Kong and Asia to buyers at discount bulk prices who 'mothball' the flats. This in no way contributes to solving the lack of housing in Lewisham nor achieving the Mayor of London's housing targets. So I would also like an undertaking that all flats that are for sale should be sold in the UK via local agents to British residents. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Listen to the people who live there. Ask them if you are not sure (unlikely). Approach us in a way that is not pushing these absurd plans on intelligent people who care about their community.			
3	LEA	**1. Do you have any comments on the proposed vision?**	5	Improving the quality and access to our existing green spaces is a key objective in the Local Plan. We have also	No change.

		Where are the plans to create more green spaces in the vision? It would be better if the development sites were allocated for open green space rather than more housing, more people, more pressure on the already over crowded infrastructure and transport. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Land at Lee High Rd and Lee Rd Sainsbury's Lee Green Leegate Shopping Centre **6. Please provide your comments on the site allocation(s) selected above.** Low rise buildings and more green space in the site rather than more housing. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		sought where practical the development of new open spaces as part of the redevelopment of large sites. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan. Lewisham like all London boroughs is dealing with a housing crises and is required by the London Plan to accommodate 1,667 homes per annum across the plan period. We believe that locating these homes in our opportunity areas and town centres that have access to good public transport connections, local facilities and jobs is a sensible and sustainable approach. This approach also means that large areas of our suburban neighbourhoods and conservation areas can be conserved and enhanced.	
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** With regard to the Leegate centre, pleases avoid buildings with the same height as around Lewisham Station. These would be too high and out of keeping with the area. I'd suggest of medium height structures of no more than 5 floors); For retail, building a replica of the types of shops found in Lewisham would probably not be sustainable, and the Sainsbury's remains the main focus in the area. An alternative may be to develop a hub of independent shops. This is challenging, but even in it's current run-down state, it still manages to house some innovate and individual shops. This may also help make the area a "destination" site. Please include some green space amenities integrating paths and cycle routes and children's play areas. (this works well around the new Kidbrooke station development, and has transformed the areas).	4	In response to the consultation the Council has prepared additional evidence on Tall Buildings.	Tall building policy amended in response to additional evidence base.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below Leegate shopping centre **6. Please provide your comments on the site allocation(s) selected above.** **See above** **7. Are there any other issues and/or approaches for the area that you feel should be considered?** No			
3	LEA	**1. Do you have any comments on the proposed vision?** The area has become dated so does need some new ideas to regenerate it and make it prosper for the community as a whole. **2. Do you have any comments on the proposed key objectives?** No **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** The plans proposed by Galliards are too big for what is a local area. If this were along the river in a derelict location then they would be considered reasonable. If you consider the height of the proposed tallest tower at 15 stories, that dwarfs the buildings on the other side of the road, namely Eltham Road, Lee Road and Lee High Road. How are these plans cohesive in the slightest? Also, where would all the retailers go during a 4 year development. The new sight would be a generic block of flats with a small convenience store and maybe a costa underneath. This would not preserve the status of a district centre. The primary schools are already full in the local area. How will they manage if the developer gets 600 flats in total. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** The plans proposed by Galliards are too big for what is a local area. If this were along the river in a derelict location then they would be considered reasonable. If you consider the height of the proposed tallest tower at 15 stories, that dwarfs the buildings on the other side of the road, namely Eltham Road, Lee Road and Lee High Road. How are these plans cohesive in the slightest? Also, where would all the retailers go during a 4 year development. The new sight would be a generic block of flats with a small convenience store and maybe a costa underneath. This would not preserve the status of a district centre. The primary schools are already full in the local area. How will they manage if the developer gets 600 flats in total. The parking is insufficient as well. Leyland Road, Cambridge and Dorville will be full of cars. **7. Are there any other issues and/or approaches for the area that you feel should be considered?**	4	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee Green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	No change.

		Less density of housing achieved by reducing the height or having more space between blocks. Phased developments so the local economy doesn't just cease to exist during a transition period			
3	LEA	**1. Do you have any comments on the proposed vision?** Its great to identity sites for increased capacity but these should be considered with the local environment in mind and how locals will use. Landscaping is really important. It hardly ever works to squeeze as much development on a site without proper consideration for the use ongoing. Though the area does have a lot of open space most is closed off as is private playing fields. So developments need to have communties in mind and to include decent open space **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** Need to be careful on density of developments with out the necessary contributions to schools, community use, GPs/medical centres etc Also the architecture /urban design is key for future generations that should enjoy the areas. People flock to blackheath village because of its charm and this needs to be replicated but not necessarily in any traditional sense but in design and usability. Better pedestrian flow. better use of zebra crossings for example better /improved street furniture. I'd suggest including locals in discussions - a working group - all in to together would be better. The recent side street closures due to covid-19 i feel have worked and removed rat runs. Much better for pedestrians. Hope they stay too. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate shopping Centre **6. Please provide your comments on the site allocation(s) selected above.** It's a shame Leegate is still in the state it is. After 12 years of living in Burnt Ash Road such potential wasted. As Lee Green is designated district shopping area (though with times a changing with how high streets are in decline with regular shopping) it would be great to see any redevelopment put the local community at its heart. To have a destination like those of Blackheath village or Greenwich town centre. To have public space and interesting architecture and public and landscaping such as trees and shrubbery. It should be safe guarded for community space for local community groups and for local independent retailers. For example providing workshop studios with a little retail space too. It would be good for any redevelopment to think about how locals will and can use it with daytime and nighttime uses. Leegate should provide housing which currently is forecasted as being needed however, this shouldnt be at the cost of decent architect and design with decent public open space and landscaping. **7. Are there any other issues and/or approaches for the area that you feel should be considered?**	5	With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.

		Developments should not necessarily just be about tall buildings as the answer to development. Balances between density, size, and local environment must be maintained.			
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate shopping centre Sainsbury's Lee Green **6. Please provide your comments on the site allocation(s) selected above.** There is no provision to increase capacity of trains at Lee and Hither Green stations to cope with the increased population with the high density residential building. There is no provision to increase provision of primary and secondary schools in the area. The high density building will increase traffic and air pollution in the area. There is insufficient consultation with the local community on replacing Leegate with 15-storey buildings and up to 450 new homes. That is too dense. We can only have max 6-storey buildings and 200 new homes, no more! **7. Are there any other issues and/or approaches for the area that you feel should be considered?** We need more green spaces, more schools, fewer cars in the area.	6	With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The Local Plan does not propose a 15-storey building – this relates to the proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2:Lee Green centre and surrounds **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate shopping centre	4	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities,	No change.

		6. Please provide your comments on the site allocation(s) selected above. We are writing to voice our opposition to the new development proposed by Galliard Homes at Leegate. As residents of SE12, we would like a solution to the Leegate area. However, the plans that were put forward by Galliard are at a significant cost to the area. 450 homes and tower blocks at 15 stories (or higher!!!) is not an appropriate development for the area. Leegate should not be turned into another Lewisham central with tall block towers and overcrowded streets. The buildings should be 5 - 10 stories in height. No higher than that. 10 stories MAX in height. The proposed structures would dwarf the surrounding areas and not to mention, there is a distinct lack of greenery in their proposal. All we see is a few scattered trees and lots of pavement. 50% of the buildings in Lee are listed buildings and the proposal does not fit with the architecture of the area. This sets a precedent that other developers would build tall towers and blight our community. Now, what about the infrastructure? Where will the children of the development go to school? Our neighbouring schools are at capacity and we would need a new school built to accommodate those children. Leybridge Estate was built and Brindishe Lee was built to educate those children. There is nothing in the plans as to where the children would go to school. Will there be more bus services to and from Lewisham to accommodate the new residents? What about a new secondary school? There is no discussion on how or what kind of infrastructure will be built. What would we like to see in the Leegate area? An area that looks similar to what was done to the Leybridge Estate. You have 1 - 2 towers of 10 stories and lots of greenery around the area. Or perhaps 4 - 5 towers of 6 stories in height? Greenery and spaces for residents and locals to enjoy. Have a look at the Conington Road area and you will see a small development that doesn't feel like it is intrusive. Housing should be adequately spaced with lots of light and greenery. Space of walking, cycling, and limit the use of cars since our area can't cope with any more cars. More local shops, not another Sainsbury's. We need a space to encourage local shops with discounted rents and revive the area with a bustling high street. We have a few great shops on Lee Road and we don't see why we can't encourage more locals to open their own businesses. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan.	
Lewisham East Area		**1. Do you have any comments on the proposed vision?** Lack of joined up approach to all the councils priorities and failure to set vision in the context of an interconnected se london makes this rather limited in scope and vision. Planners talking about Leegate without much mention of how these massive developments will impact on the residential areas is so disapointing. Proposing to have 15 story high tower block in the sensitive area around the Tigers Head whilst pushing all efforts to show Blackheath is protected is likely to lead to widening inequalities (geographically) and making Blackheath and immediate surrounds ever more unafforable whilst Lee contines to be spoilt - especially given the proposal to develop in the conservation area. NO mention of Manor House gardens which local community has done much to support (volunteer gardeners etc) **2. Do you have any comments on the proposed key objectives?**	0	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. Employment and skills – please refer to Part 2 Section 8 of the plan Economy and Culture and in particular Policy – EC9 training and job opportunities. Public health – we liaise on an ongoing basis through our duty to corporate and Infrastructure planning with	The Local Plan and Infrastructure Plan have been amended to make specific reference to Urban National Park, forming part of an integrated District Park.

		IN general best to let form/structure follow function and these objectives dont seem to be backed up by clear outline of how the areas functioning will be improved - there are some feel good elements but dont really get a feel of how these fit with the "living and breathing area". Certainally not much sense of how population through the lifecycle of ages fit into this structural plan. In particular complete absence of the fact this area abuts greenwich and well know poor relationship with greenwich council shows up in this plan. Lewisham doesnt exist in isolation and more should be made of how these proposals will work with greenwich and compliment those develoments. Lack a sense of how these developments work to improve employment and skills for local residents - what are the gaps and what employment will be attracted here - need to link to thinking on how the structures need to take account of the opportunties and challenges for work in this area. Lack much consideration of public health and like impact on pandemic and future pandemics (more dense areas worse rates of infection)- suggests there is a lack of discussion and linkage between the public health dept of the council and planners - see good work done in Catford by Rushey Green Timebank/Lewisham Local and lack of action on allotments (see papers below which show lewisham in a poor light) Notable lack of consideration of how people can be encouraged to grow their own - and poor running of allotments by Lewisham which has been highlighted as doing particularly poorly in this area. especially good for those who are older and isolated as well as new arrivals (including asylum seekers). https://www.imperial.ac.uk/news/204133/thousands-chasing-london-allotments-supply-dwindles/ https://www.sciencedirect.com/science/article/abs/pii/S1618866720306403?via%3Dihub https://www.imperial.ac.uk/news/215713/imperial-researchers-develop-unique-roadside-barrier/?utm_source=linkedin&utm_medium=social&utm_content=e28ed342-d10e-403d-93a9-0a5daca8ccfc&utm_campaign=news Given the high profile death of Debra AK daughter would have thought more consideration would be given to this - making Lee High road better for cycling when there is so much pollution shows a lack of joined up thinking - and silo approach to planning. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds LEA3: Strategic Area for Regen, Grove Park LEA5: East Lewisham links **4. Please provide your comments on the topic(s) selected above?** Dont support massive high towers - should not go above 10 note what happened in Greenfel - and note this isn't the best way to build a community. Very little evidence of community engagement over these developments - just official inaccessible consultation - very dissapointing approach.		our public health colleagues who have provided comments on the plan. Allotments – Please see policy on allotments and the Parks and Open space strategy which underpins the plan. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	

		Grove park urban park could help to prevent the aggressive planning applications that have been coming forward in that area. There is an important nature reserve and opening up this area from Hither green is important if done with much better community engagement. The allotments are an important site which have been neglected but should be opened up for more to access - and to help those struggling with isolation and mental health issues - see whats been done in Catford and try and bring some of this to that area. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre Sainsbury's Lee Green Land at Lee High Rd and Lee Rd **6. Please provide your comments on the site allocation(s) selected above.** for Leegate Ten stories is still massively high around the Tigers Head - should not allow higher than this - as usual Lewisham councillors wont listen. Sainsburys should be enabled to stay. Lee Road is ripe for redevelopment but seeing the poor quality of product down near Lewisham station I fear for further developments. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** No mention of learning lessons from the massive development in Lewisham centre and poor quality housing with limited green spaces. What about the impact of increased work from home for white collar workers and impact on the afforability of these properties. Very limited context about likely needs for schooling and for healthcare capacity. Have you discussed with local NHS - i guess not as Lewisham councils attitude to local NHS comes across as very old style and confrontational (we should be in charge) and not collaborative.			
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** The lack of human scale or public realm in the proposed Galliard Homes development at the Leegate Shopping Centre is a huge concern. It appears that hitting Lewisham targets for the growth of residential units is taking precedence over the genuine needs of the local population of Lee Green. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre	3	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

		6. Please provide your comments on the site allocation(s) selected above. The proposed height and mass of the buildings increase the destructive environmental impact of the proposed development on the construction process. The proposed development will change the nature of the current neighbourhood and appears to take account of developer ambition rather than local regeneration needs. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Please ensure that you listen to residents and deal with this eyesore that we have been suffering for years without action by the council or the site's previous owners, but do not make it worse by insensitive and intensive development.			
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA1: East Area place principles LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** The proposed height, density and massive scale of the proposed building development at Leegate Centre are out of keeping with your LEA1 East Area place Principle F – "The sensitive intensification of established residential neighbourhoods will be supported where new development responds positively to their distinctive local character, including the landscape setting". **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre **6. Please provide your comments on the site allocation(s) selected above.** There is no attempt at matching any of the local neighbourhood's characteristics in the development proposal from Galliard Homes and no green space to match that of the Leybridge Court estate which is just across a minor road from the site. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Most local people agree that the Leegate Shopping Centre has been mismanaged and left to deteriorate, but a sensitive and viable development, taking account of the limited local infrastructure, need for shops, community facilities and job opportunities is what we need	2	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A	1	We do not believe that the intensification of sites within the Lee Green district centre contradicts making the best use of land and facilitating Good Growth.	No change.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below LEA1: East Area place principles **4. Please provide your comments on the topic(s) selected above?** While the redevelopment of the Leegate Centre as an intensive residential site complies with your blanket Principle E ("The intensification of sites within the Lee Green district centre"), it clearly contradicts your LEA1 East Area place Principle A – "Development proposals must make the best use of land in helping to facilitate Good Growth". **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate shopping Centre **6. Please provide your comments on the site allocation(s) selected above.** The principle outlined in LEA1 East Area place Principle A – "Development proposals must make the best use of land in helping to facilitate Good Growth" - is already made ineffective by plans to intensify residential development at the Leegate Shopping Centre. 'Good growth' (there is no definition in your draft Local Plan glossary) is not facilitated by intensive residential development at the expense of commercial and community infrastructure. 7. **Are there any other issues and/or approaches for the area that you feel should be considered**? Council site allocations and planning decisions should follow the principles outlined in the draft Plan. The Leegate Shopping Centre desperately needs to be tackled in an effective way to meet local requirements for good quality housing, employment and community facilities.			
3	LEA	**1. Do you have any comments on the proposed vision?** The smileys are an easy way for a developer to claim community response which totally negates any local nuance. **2. Do you have any comments on the proposed key objectives?** New developments should be planned in relation to each other and in keeping with the low rise buildings here. Leybridge at 10 stories is an anomaly and should NOT be considered a baseline. Current leegate height should not be exceeded. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** No buildings taller than existing leegate. Plans ensuring no additional pollution. Developer to pay for social costs (new schools, GP etc). **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected	2	In response to the consultation the Council has prepared additional evidence on Tall Buildings.	Tall building policy amended in response to additional evidence base.

		6. Please provide your comments on the site allocation(s) selected above. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Don't let developers try and nice us up with fancy promotional materials.			
3	LEA	**1. Do you have any comments on the proposed vision?** Lee Green The proposed housing units make this a very high density development. The proposed height of the development is way out of scale with surrounding buildings. The pollution from work traffic, CO2, dust and noise for existing residential roads would be intolerable. The existing infrastructure of schools, doctors and social support is insufficient to support the proposed development. Parks, open spaces, cycle tracks and the preservation of quiet residential roads do not feature highly in the plans. **2. Do you have any comments on the proposed key objectives?** Providing affordable homes is fine as long as developers take into consideration the existing residential roads **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** The proposed development is out of scale with the local area, offers no attractive features and could result in a concrete wind tunnel attracting no one but loiterers. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre **6. Please provide your comments on the site allocation(s) selected above.** The sight needs development but the current proposals do not enhance and improve the site **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Dorville Road will be used as a main access road to the site. Currently the increased traffic from road closures is intolerable. On development the traffic from work lorries etc will be horrendous.	1	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.
3	LEA	**1. Do you have any comments on the proposed vision?** I am responding to the Local Plan regarding the future development of the Leegate Shopping Centre.	3	All development proosals will be assessed against draft policy QD1 Delivering high quality design in Lewisham which states: *All new development must follow a*	No change.

		It is very important that the Centre is redeveloped into a good community area for local businesses to have affordable rent and new housing. As a neighbouring resident, I'm raising concerns about the current proposals suggested by Galliard Homes. Lewisham Council is planning to develop three sites:- The Leegate Shopping Centre, The BMW garage, and Sainsbury's. Guidance in the Local Plan doesn't ensure that all these sites are developed in ways that link up with each other and enhance Leegate. The Plan should state clearly that new developments in the area must fit in with existing older buildings at the Lee Green Cross Roads. These buildings average two storeys and have a maximum height of four storeys. They include a Grade ll listed fire station and a locally listed Old Tigers Head pub. The River Quaggy alongside the BMW site and the back of Weigall Road playing Fields is opened up with access for all as nature is very important for people's health. The work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee. My main concern is the planning of up to 630 new homes , their height and the infrastructure regarding them in Lee. The proposed height of the new buildings in the Leegate development by Galliard Homes, is i proportional to existing buildings and the current structure. Their proposed block heights will reach 15 storeys high, which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - they are 10 storeys high. Any new Local Plans should set a 3-storey maximum height limit for any single building planned for the Lee Green area. It should also state an expectation that most new housing developments should be in keeping with existing buildings of 3-storeys. This will ensure public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings, over crowding and helps to ensure safety. Tall buildings reduce natural light in surrounding areas - may I see a light study test please?Very tall buildings will make the area unwelcoming, unattractive and deter people from using the shops and facilities being planned for the site. With up to 630 new homes, this increases crime and shall place a big burden in already over-subscribed services such as schools, GPs and hospitals. Most trains do not run very frequently and most mornings (prior to lock down) it was impossible to fit into an overly crowded train carriage. The amount of new people into Lee will place a burden on services. How is the building work, particularly large lorries, gas and electrical digging, going to affect local residents? With Local roads closed off and traffic congestion, particularly school runs, this is going to exasperate traffic standing still and poor air quality. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. Developments need to respect the proportions and community feel of the		*design-led approach to contribute to delivering high quality, inclusive, safe, healthy, liveable and sustainable neighbourhoods in Lewisham. This requires the consideration of design options at the early stage of the development process informed by an understanding of the local context, including through effective engagement with the local community. These design options should then be used to determine the most appropriate form of development that responds to the local context, along with the optimal use of land to support the delivery of the spatial strategy for the Borough.* The rest of the response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan.	

		local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities which will be especially needed by older people. The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children. The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan. **2. Do you have any comments on the proposed key objectives?** N/A 3. **Do you have any comments on the proposed approaches for the area?** Select topic(s) and comment below LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** I am responding to the Local Plan regarding the future development of the Leegate Shopping Centre. It is very important that the Centre is redeveloped into a good community area for local businesses to have affordable rent and new housing. As a neighbouring resident, I'm raising concerns about the current proposals suggested by Galliard Homes. Lewisham Council is planning to develop three sites:- The Leegate Shopping Centre, The BMW garage, and Sainsbury's. Guidance in the Local Plan doesn't ensure that all these sites are developed in ways that link up with each other and enhance Leegate. The Plan should state clearly that new developments in the area must fit in with existing older buildings at the Lee Green Cross Roads. These buildings average two storeys and have a maximum height of four storeys. They include a Grade ll listed fire station and a locally listed Old Tigers Head pub. The River Quaggy alongside the BMW site and the back of Weigall Road playing Fields is opened up with access for all as nature is very important for people's health. The work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee. My main concern is the planning of up to 630 new homes , their height and the infrastructure regarding them in Lee. The proposed height of the new buildings in			

		the Leegate development by Galliard Homes, is i proportional to existing buildings and the current structure. Their proposed block heights will reach 15 storeys high, which far exceeds the height of any other building in the area and is fifty percent higher than the other highest nearby buildings - the flats on the Leybridge Estate - they are 10 storeys high. Any new Local Plans should set a 3-storey maximum height limit for any single building planned for the Lee Green area. It should also state an expectation that most new housing developments should be in keeping with existing buildings of 3-storeys. This will ensure public areas provided for walking, sitting and shopping would not be overpowered by an array of high buildings, over crowding and helps to ensure safety. Tall buildings reduce natural light in surrounding areas - may I see a light study test please?Very tall buildings will make the area unwelcoming, unattractive and deter people from using the shops and facilities being planned for the site. With up to 630 new homes, this increases crime and shall place a big burden in already over-subscribed services such as schools, GPs and hospitals. Most trains do not run very frequently and most mornings (prior to lock down) it was impossible to fit into an overly crowded train carriage. The amount of new people into Lee will place a burden on services. How is the building work, particularly large lorries, gas and electrical digging, going to affect local residents? With Local roads closed off and traffic congestion, particularly school runs, this is going to exasperate traffic standing still and poor air quality. There is an opportunity now to develop Lee Green into the 'vibrant, more welcoming and accessible' centre as the Plan suggests on page 633 para 16.7. Developments need to respect the proportions and community feel of the local area and not create the highrise blocks of parts of Kidbrooke Village and Lewisham town centre. I believe it is essential that the infrastructure should be developed so it can match the number of new residents with increased medical services, schools, green spaces, play areas, a good size community centre for people to use and sufficient parking facilities which will be especially needed by older people. The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children. The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan. 5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below LeeGate Shopping Centre **6. Please provide your comments on the site allocation(s) selected above.** Buildings shouldn't be taller than 3 storeys Concern about up to 630 new homes, increases burden on local infrastructures, increases crime. Tall buildings removes light and community feel.			

		7. Are there any other issues and/or approaches for the area that you feel should be considered? The roads blocked off and traffic congestion, schools, local parks should be developed.			
3	LEA	**1. Do you have any comments on the proposed vision?** This is a positive vision for the area although it's not always clear how this can be achieved. The desire to intensify Blackheath's night-time economy needs to be considered in the light of residents' concerns about noise, etc. **2. Do you have any comments on the proposed key objectives?** Many of these are good, but there are no practical solutions to reducing vehicular traffic and turning some major arterial roads into healthy streets. Moreover, the need for people using the re-developed Leegate centre and Sainsbury's site to be able to take home their shopping is not addressed in a practical manner. Simply wishing away cars by reducing the amount of parking available could ultimately lead to these shopping areas being unviable. Please remember that many elderly, frail and other people who cannot carry heavy shopping do not necessarily own blue badges and after the Covid epidemic is over I doubt as many younger people will have the time to walk and cycle to the shops. Public transport must be improved. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** The stated approach to the Lee Green district centre, that new development should be in keeping with the character of the area, is laudable, but there is no evidence that this is being taken into account when looking at new proposals for the Leegate centre or the Mayfield's hostel. Optimising the use of land is fine but there should be strict requirements as to the proportion of affordable housing which is to be provided in any development and the consequences for local services, including schools, doctors, dentists, etc. must be taken into account. How is the rebuilding work at Leegate and the Sainsbury's site going to be coordinated so that there will be one large supermarket in the area at any given time? **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre Sainsbury's Lee Green Mayfields Hostel, Burnt Ash Hill **6. Please provide your comments on the site allocation(s) selected above.** In all three cases there is an issue about the height of proposed buildings and the extent to which they will be out of character with the rest of their surroundings. As the scoping letter for the Leegate centre states, views from different directions will also need to be taken into account. If the Leegate shopping centre is going to have 630 rather than 450 residential units then support services will need to be increased substantially in the area. As outlined under key objectives, there is a problem about creating a large shopping centre without providing adequate parking or some method for transporting shopping home.	1	We acknowledge that improving streets throughout the borough including within Lee Gate and Blackheath is important. We will continue to work with our transport colleagues and TFL to deliver this. The Local Plan is underpinned by a Transport Assessment and other key documents such as the Councils Transport Strategy and Local Implementation Plan. The Local Plan outlines our policy HO3 on genuinely affordable housing – this seeks to achieve a strategic target of 50% and maximise the number of genuinely affordable housing delivered in the borough. All proposals are subject to viability as set out in the National Planning Policy Framework. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. The Councils approach to LTNs is outlined in more detail on the Council's website.	No change.

		7. Are there any other issues and/or approaches for the area that you feel should be considered? I do not feel that the traffic question has been taken seriously enough. There is talk of turning key roads into healthy streets, yet those very same roads now receive a lot more traffic as a result of the Lee Green LTN. The congestion around the Lee Green crossroads will be made even worse by construction vehicles. Some imaginative scheme needs to be found to cope with traffic coming from central London out to Kent and vice versa which necessarily comes via Lewisham. It is not acceptable simply to hope that this traffic will disappear (evaporate) if you make life difficult enough for drivers. Many local businesses could also be affected by these plans, especially if parking is not provided. This is not to say that cycling and walking should not be supported too, and plans for the Quaggy and green spaces are laudable.			
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA1: East Area place principles **4. Please provide your comments on the topic(s) selected above?** The decision to significantly intensify the residential use of the Leegate Centre is in direct contradiction to your stated LEA1 East Area place principle A (a) to "secure the centre's long-term vitality and viability and to enhance its role as key focal point for community activity, in line with Policy LEA2 (Lee Green district centre and surrounds)". **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre **6. Please provide your comments on the site allocation(s) selected above.** The over-development of the Leegate Centre site as an intensive residential area with buildings out of scale with the immediate surrounding neighbourhood does not contribute to the "vitality and viability" of the centre or its role as a "key focal point for community activity" (LEA1 East Area place principle A). There are few community focused opportunities for local activities within the proposed site and the over-development of housing will lead to an imbalance in facilities in the local area. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** LEA1 East Area place principle A is a good one and your site allocations and planning decisions should follow this. The Leegate Centre desperately needs to be tackled in an effective way to meet local requirements for good quality housing, employment and community facilities.	2	We do not see a contradiction in providing high-density, mixed use development and securing the long-term vitality and viability of the town centre.	No change.
3	LEA	**1. Do you have any comments on the proposed vision?**	1	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate	No change.

		Yes, in the case of the Galliard Homes proposal for Lee Green, please explain how the current planning proposal meets the vision? I am concerned that the vision has been made to sound positive, but that the reality will be very different. **2. Do you have any comments on the proposed key objectives?** **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA4: Linear network of green infrastructure **4. Please provide your comments on the topic(s) selected above?** LEA4 - fantastic proposal, yes please, it is important for climate change and the future of our planet, and for the health and well-being of the people of Lewisham **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	
3	LEA	**1. Do you have any comments on the proposed vision?** Worried it will become over developed on an already very busy junction. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** I don't think anything should be built any higher than the the existing surrounding building currently are. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Sainsbury's Lee Green **6. Please provide your comments on the site allocation(s) selected above.** I am very keen for this sainsburys to remain. It is so important to the local community. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. In response to the consultation the Council has prepared additional evidence on Tall Buildings.	Tall building policy amended in response to additional evidence base.

3	LEA	**1. Do you have any comments on the proposed vision?** Better Streets for Grove Park, a group of 60 residents living in Grove Park, support the objectives of the proposed vision, but believe they should be prioritised in order to make the south eastern part of the borough more equitable. **2. Do you have any comments on the proposed key objectives?** Page 635 Key Spatial Objective 6 in the main document refers to "transform the South CIrcular (A205, Baring Road) and Lee High Road (A20) into a Healthy Street". We would suggest the wording of this is altered to "adopt the healthy streets approach along the A205, Baring road and A20 corridor" and encourage the planning team to follow TfL guidance on this which is clear and unequivocal. This should also form part of the strategic planning document for the whole corridor, and form conditions of planning along the corridor, including CIL contributions to part fund improvements. LEA1 East Area place principles; In order for the council to meet Policy TR3 in the East area, LEA1 sections D, G and K need to state the requirement for public realm to be provided with the Healthy Street approach adopted throughout the corridor from Blackheath Village, via Lee Road, through Lee Green junction, along Burnt Ash Road and Baring Road upto and including Grove Park town centre. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA3: Strategic Area for Regen, Grove Park LEA5: East Lewisham Links LEA4: Linear network of green infrastructure **4. Please provide your comments on the topic(s) selected above?** LEA3, Regeneration in Grove Park should adhere to the Grove Park Neighbourhood plan. For LEA4, development should provide CIL contributions to remedy severance by the railway line and include S106 provision for a new disabled accessible bridge from Grove Park nature reserve connecting Railway Children walk. LEA5: East Lewisham links and any upgrade of green chain walk to cater for walking and cycling should meet London Cycle Design Standards to cater for future walking and cycling demand. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Sainsbury's / Land west of Grove Park Station **6. Please provide your comments on the site allocation(s) selected above.** In order for the council to meet policy TR3 in the East area, Development requirements (16.51) should take into account plans for strategic cycle routes identified in the Council Transport Strategy running north-south along Baring Road as integral to providing access to high quality public realm and adopting the Healthy Streets approach. **7. Are there any other issues and/or approaches for the area that you feel should be considered?**	4	Noted The Grove Park Neighbourhood Plan is now adopted policy and will be used in conjunction with Local Plan and London Plan policies to assess planning applications. CIL – the spending of strategic CIL will be agreed by cabinet members. NCIL – spending on NCIL was agreed by Mayor and Cabinet. Cycleways – the Local Plan identifies key cycle routes throughout the borough underpinned by the Councils Cycle Strategy.	Wording changed to "adopt the healthy streets approach along the A205, Baring road and A20 corridor"

		Action be travel should be prioritised along with mitigation measures to protect residents against any displacement effects from the introduction of ULEZ. This should include infrastructure for active travel, bus priority and healthy neighbourhoods			
3	LEA	**1. Do you have any comments on the proposed vision?** I am not a member of Make Lee Green, but I support their statement which may be found here. https://makeleegreen.wordpress.com/2021/04/09/our-response-to-the-lewisham-local-plan-consultation/ We need the full Lee Green LTN reinstated ASAP and we need additional LTNs rolled out across the borough urgently - especially in light of the council's own declaration of a climate emergency. This needs to happen this year. **2. Do you have any comments on the proposed key objectives?** I endorse the statement made by Make Lee Green, even though I am not a member. https://makeleegreen.wordpress.com/2021/04/09/our-response-to-the-lewisham-local-plan-consultation/ Action on Main Roads The Plan recognises that the “strategic corridors”, the A20, A21 and South Circular are major barriers to progress and are the cause of significant health, social and environmental problems in the Borough. I support the stated aim of transforming them in to “well functioning and healthy streets”. But no solutions are proposed in the Plan. These roads should not be A-roads. They are not fit for purpose. The plan needs to recognise them for what they are – in large part residential roads with excessive traffic on them. Diverting this traffic on to B and unclassified streets is not a solution. A radical re-think is required. Either they need to be reclassified and traffic managed down to normal levels, or they need to radically upgraded to cope with the volumes of cars on them. All three of these roads are planning errors from the 1960s that need to be corrected, and a failure to acknowledge this will seriously hamper the ability of the Council to deliver on the objectives of the Plan. Action on Parking Part of the solution to uncontrolled car use should be to gradually restrict parking. London has two parking spaces for every car and not enough homes for every person. Our priorities need to change. ● Car-free residential developments should be the norm rather than the exception. ● Residents’ car-parking charges should reflect the full cost of the pollution and environmental damage caused by specific vehicle types. ● Residents should be able to install secure bicycle and mobility scooter parking anywhere that privately owned cars can be parked Action for Pedestrians In Lee Green, I would like to see the following principles applied to all new developments so that walking is enabled and encouraged.	4	Further detail on the Councils approach to LTNs can be found on the Councils website. The Local Plan is a strategic policy document. Details of individual road improvements will come forward separately. The Local Plan is underpinned The Local Plan is underpinned by a Transport Assessment and other key documents such as the Councils Transport Strategy and Local Implementation Plan. The Local Plan sets out a clear policy on Parking which is aligned with the London plan. All proposals will be car-free or car-lite. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. In response to the consultation the Council has prepared additional evidence on Tall Buildings.	No change.

		● Gear Change and LTN 1/20 include bicycles as vehicles and that cyclists and pedestrians should not share the same spaces – this new guidance should apply to all shared public and private realm. ● Maintain at least 60mm kerbs to separate pedestrians from vehicles (including bicycles) with white painted tops. This not only re-enforces safe separation but also helps children, people with vision impairment and dogs to identify the kerb edge. ● Developments should be permeable for people walking – this means increased permeability so that residents are facilitated in walking in any direction from development. ● Minimise the amount of hard surface and maximise natural, planted areas in order to reduce rainwater runoff into the wastewater system. ● Place all residential parking to the edges so that if private vehicle ownership declines then that space can be re-purposed as green space. ● "Easy to live in and difficult to drive in" should be adopted by the designers - or "better for people and better for the planet". ● Residential and commercial waste should not be stored on the footway at any time. ● Designers should read and understand the Create Streetsdocument "The bin-lorry effect" and reduce the amount of space given over to service functions. Lighting columns should be placed so the footway maintains comfortable widths for people walking. ● Service boxes should not be located on the footway. ● Footways on new developments should be wide enough to allow two people to walk alongside each other, wheelchair users and buggies to pass and for people to comfortably pause and linger without feeling as though they are obstructing others. ● Each off-street motor vehicle parking space must have electric- vehicle charging functionality (the current plan is for a rather poor 20%). Action on Cycling Lewisham's record on safe cycling is particularly poor and this needs to change urgently. ● Segregated cycle lanes should be installed on all main roads under both TfL and Council control. All new developments along corridors such as the A21, A20, A205 and A2212 should have strategic planning conditions required by S106 or CIL contributions from developers to provide funding for the necessary infrastructure to meet Council Transport and Cycle Strategies. ● Cycling infrastructure should be fully integrated with the public transport network. There should be safe cycling routes to and from all train and tube stations. This should be designed in line with TfL Cycling Action Plan requirements, meeting or exceeding London Cycle Design Standards. ● Adequate, secure bike racks should be installed at every station, high street, residential development and school exceeding current London Plan requirements.			

		● The Plan should incorporate the recommendation of the London Cycling Campaign's Climate Safe Streets report. Action on Green Space The Plan identifies the importance of green space for health and wellbeing. I agree that access to nature and shared open space should be a priority for this Plan. ● New green space should be a mandatory requirement for any new development. The redevelopment of the Kidbrooke estate is a good example of how green space can significantly enhance new residential areas. ● The Council should consider re-wilding of existing green space and rivers to enhance biodiversity. ● Community applications for street tree planting should be prioritised over car parking. Action on Housing and the Built Environment. Buildings contribute half of all carbon emissions in Lewisham, the vast majority it from the existing building stock, yet the Plan is largely silent on this issue. ● The Plan should set mandatory targets for social and affordable housing (as well as identify the current baseline levels). ● There should be a much greater focus on upgrading the existing building stock to improve energy efficiency and more to low- carbon heating and electricity. ● Planning policies should encourage on-site renewable heat and energy generation, such as rooftop solar and ground and air-sourced heat pumps. ● The same requirements for zero- carbon buildings should apply to extensions as to new buildings. ● Commercial developments should have mandatory space for community-focused and not for profit organisations. Priority should be given to cooperatives and environmentally-focused organisations. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** Large increases in housing need corresponding increases in infrastructure. This does not look forthcoming in the Plan. Lee Green is not currently allocated any money from Lewisham council's major infrastructure spending pot. Other wards are. Lee Green also receives the lowest amount of all Lewisham's wards from the much smaller 'community' infrastructure pot. Galliard Homes proposals for Leegate have over 450 housing units; more units than the Leybridge Estate behind Leegate has. When the Leybridge Estate was built Brindishe Lee was built to educate its children. If the Sainsburys and BMW garage sites are developed to similar density as Galliards proposed Leegate plans, demand for local infrastructure will be tripled. We need drastic improvements in our roads and pavements to support this large increase in population, segregated cycle lanes to allow for active travel and wider pavements			

		with on-pavement parking banned. We need a better train service and more buses or trams connecting Lee Green with Lewisham, Greenwich and Eltham. The London Plan states that tall buildings should only be built in places with transport links and other infrastructure that can support them. Lewisham has looked at it's evidence and it appears you have explicitly excluded Lee Green from your Tall Building opportunity areas in the Plan. This must be addressed. Galliard Homes are proposing building up to 15 storeys high, exceeding maximum existing local height by 37%. This is against the wishes of the community as expressed in the Lee Neighbourhood Plan which has been widely consulted on. This may set a precedent for developers wanting to redevelop the Sainsburys and BMW sites, who would think they could also exceed existing local height by 37%. Cumulatively, this will increase height in Lee Green considerably. The height of the buildings should be in line with the agreed height in the existing Lee Neighbourhood plan. Additionally, the infrastructure needs to be vastly upgraded to manage such a huge increase in population. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre Sainsbury's Lee Green Land at Lee High Rd and Lee Rd 6. **Please provide your comments on the site allocation(s) selected above**. The London Plan states that tall buildings should only be built in places with transport links and other infrastructure that can support them. Lewisham has looked at it's evidence and it appears you have explicitly excluded Lee Green from your Tall Building opportunity areas in the Plan. This must be addressed. Galliard Homes are proposing building up to 15 storeys high, exceeding maximum existing local height by 37%. This is against the wishes of the community as expressed in the Lee Neighbourhood Plan which has been widely consulted on. This may set a precedent for developers wanting to redevelop the Sainsburys and BMW sites, who would think they could also exceed existing local height by 37%. Cumulatively, this will increase height in Lee Green considerably. The height of the buildings should be in line with the agreed height in the existing Lee Neighbourhood plan. Additionally, the infrastructure needs to be vastly upgraded to manage such a huge increase in population. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Lower rise buildings AND a speedy improvement in infrastructure (cycling and walking in particular)			
3	LEA	**1. Do you have any comments on the proposed vision?** Vision leads us into the hands of developers. **2. Do you have any comments on the proposed key objectives?** Lets make Lewisham a genuinely cultural and creative hub not an overbuilt centre like Croydon and all the troubles that, that has brought. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds	3	The Local Plan has clear policies on protecting and enhancing the boroughs cultural institutions and creative industries. The Local Plan also has a strong policy on affordable workspace. Much of the remaining comments relates to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation.	No change.

		4. Please provide your comments on the topic(s) selected above? "The network of green infrastructure within the East Area and its surrounds, including outside of the Borough, contributes to the area's distinctive character and environmental qualities. Development proposals should contribute to protecting and enhancing this network of green infrastructure, including by integrating greening measures that establish new linkages and greater continuity between green and other open spaces, in line with Policy LEA4 (Linear network of green infrastructure). " How does the proposed Sainsbury's and Leegate support this ? **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre Sainsbury's Lee Green **6. Please provide your comments on the site allocation(s) selected above.** Building excessive flats in an area designed for family housing will ruin the attractive, family and community based culture of Lee Green and Hither Green. There is no justification for a 44% increase in accommodation at Leegate and a 15 story building that will change the historical and cultural importance of the area. In addition they will place an unacceptable burden on already oversubscibed resources, schools health services and amenities. Lewisham should not be influenced by the the false rewards of the Neighbourhood Community Infrastructure Levy (NCIL) grant as this is trivial compared to the amounts that developers such as Galliard make. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Leegate and the surrounding area of Hither Green are beginning to develop a rich and varied independent based shopping, alternative services and creative resources that attract and reflect the existing residents. Any new development should support these offering affordable studios and workshops.These areas are what attract people to build and sustain living locally mass high density accommodation was tried before in Leegate please learn from that disaster and not replicate it.		Residents will have the opportunity to express their views on the scheme through the Development Management process.	
3	LEA	**1. Do you have any comments on the proposed vision?** I do not feel comfortable with any thing more than a 4 story development on these sites. The density of living and lack of infrastructure (schools, hospitals etc) is deeply concerning. **2. Do you have any comments on the proposed key objectives?** They should be significantly downsized with investment alternatively in more schools and social services for the current Lewisham residents and a small increase of new residents at these sites **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?**	3	With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	No change.

		The proposals do not reflect the community or consider the infrastructure demands of an increased population in Lewisham. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LEA	**1. Do you have any comments on the proposed vision?** Yes I like the vision **2. Do you have any comments on the proposed key objectives?** Yes I like these **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** I really like this approach, all the principles seem to me to be very sound. I am especially disturbed by the decline of the Leegate in the hand of the previous Landlord, and the opportunity for the new redevelopment under a new owner is great. I really like the opportunity for a new vibrant Leegate commercial, service and creative centre, and the obvious support and enthusiasm this i think could get from the local community. I have lived in the area for 30 years, when we first moved the Leegate was a brilliant place to go. That it has been allowed to decay in such a way is a terrible indictment of the previous landlord. Putting this right will be a major achievement. That said I am now very concerned about what may be allowed under the 'intensification of sites' without reference to the surrounding character of the area. Specifically with reference to the Leegate, to put between 450 and 630 new residential units on that space with vibrant commercial, arts, creative, services with enhanced public realm seems very ambitious. The 'accepted' working solution appears to be to go up. A 15 storey residential block is surely much too tall for the area, and seems to go against national government guidance which reigns back tall developments . It also appears that this 'intensification' builds on tacit uncritical acceptance of previous terrible redevelopments - Leegate and Sainsburys, and does not take into account the scale and character of the surrounding area. Furthermore I am extremely concerned by levels of traffic and pollution at the Tiger's Head junction. This seems to me to be a major challenge to be overcome before significant residential blocks are put anywhere near Burnt Ash Road and Eltham Road. It's simply unfair to the new residents, in whichever economic	0	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

		category they fall. And as a recent local case has established excessive pollution does cause early deaths. This is an opportunity to stand back and put something really good and lasting in place. So a new development should certainly not take the St Modwen 2018 planning application as the starting point for the new plan. That would be a travesty, this needs a solution that is agreed - or at least consented - with and by the local community. Developers riding roughshod and stripping such valuable community assets for the benefit of their own interests is so wrong. I have commented here about the Leegate. However, these priciples apply for future developments of Sainsburys and the BMW garage site. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre Sainsbury's Lee Green Land at Lee High Rd ad Lee Rd **6. Please provide your comments on the site allocation(s) selected above.** I really like this approach, all the principles seem to me to be very sound. I am especially disturbed by the decline of the Leegate in the hand of the previous Landlord, and the opportunity for the new redevelopment under a new owner is great. I really like the opportunity for a new vibrant Leegate commercial, service and creative centre, and the obvious support and enthusiasm this i think could get from the local community. I have lived in the area for 30 years, when we first moved the Leegate was a brilliant place to go. That it has been allowed to decay in such a way is a terrible indictment of the previous landlord. Putting this right will be a major achievement. That said I am now very concerned about what may be allowed under the 'intensification of sites' without reference to the surrounding character of the area. Specifically with reference to the Leegate, to put between 450 and 630 new residential units on that space with vibrant commercial, arts, creative, services with enhanced public realm seems very ambitious. The 'accepted' working solution appears to be to go up. A 15 storey residential block is surely much too tall for the area, and seems to go against national government guidance which reigns back tall developments . It also appears that this 'intensification' builds on tacit uncritical acceptance of previous terrible redevelopments - Leegate and Sainsburys, and does not take into account the scale and character of the surrounding area. Furthermore I am extremely concerned by levels of traffic and pollution at the Tiger's Head junction. This seems to me to be a major challenge to be overcome before significant residential blocks are put anywhere near Burnt Ash Road and Eltham Road. It's simply unfair to the new residents, in whichever economic category they fall. And as a recent local case has established excessive pollution does cause early deaths. This is an opportunity to stand back and put something really good and lasting in place. So a new development should certainly not take the St Modwen 2018 planning application as the starting point for the new plan. That would be a travesty, this needs a solution that is agreed - or at least consented - with and by the local		

		community. Developers riding roughshod and stripping such valuable community assets for the benefit of their own interests is so wrong. I have commented here about the Leegate. However, these priciples apply for future developments of Sainsburys and the BMW garage site. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Yes. It is incredibly important that this is done with a good transparent and fair process. We are in difficult times, where many people are off balance, now more than ever lets have a good process that enables good consultation and as much as possible win - win options.			
3	LEA	**1. Do you have any comments on the proposed vision?** judsing by the horrible assing of plans on Blackheath Hill the Planning Committe has already decided what they want. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA4: Linear network of green infrastructure **4. Please provide your comments on the topic(s) selected above?** A new Lewisham Park ..no building **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Blackheath Hill LSIS **6. Please provide your comments on the site allocation(s) selected above.** The Chair of planning has already voted for mmature tree removal and another tower block on the industrial land off Black Heath Hill. So diabled tenents next door get a brick wall replacing alive. mature nourishing trees and wildlife, the bee business is snookered and there is yet more removal of units for the development of small business units for what...tower blocks, concrete, loss of light, higher CO dioxide... NO SOUL **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	This response seems to relate to a planning application for Blackheath Hill. Please refer to the committee decision on the reasons for its approval.	No change.
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?**	1	As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.

		N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre **6. Please provide your comments on the site allocation(s) selected above.** There does not seem to be anything that acknowledges the need for infrastructure to support such a large number of new homes on the Leegate site: this number of new homes impacts upon transport capacity for buses, train and road, and is there enough capacity at local schools for this? Furthermore, I am unhappy about the proposed height of the buildings at Leegate - I am not happy for this introduction of high rise properties to set any kind of precedent for this to be the norm. The high rise nature of Lewisham town centre is awful, and has not turned out as was originally proposed . **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LEA	**1. Do you have any comments on the proposed vision?** Full of nice words, light on detail. And where there is detail it seems to belie the stated aims. **2. Do you have any comments on the proposed key objectives?** There already seems to be a disconnect between the nice words and the proposals for the area in the current plans for the Leegate Centre. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** The existing proposals are completely out of scale with the current area. The Leegate proposals now seem to include plans for 600+ dwellings rather that the, already out of scale, 450 that are in the published Local Plan. Where is the infrastructure to support this many households going to be situated, schools and GPs just to start with ? **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre Sainsbury's Lee Green Land at Lee High Rd and Lee Rd **6. Please provide your comments on the site allocation(s) selected above.** The Leybridge blocks are part of an earlier town planners' enthusiasm. But are well spaced out and set back from the road. The Leegate proposals are a huge clump of closely spaced tower blocks that will totally dominate the surrounding area. They have taken the Leybridge 'marker' of 11 floors and added nearly 50% (15 floors). Will the development of Sainsburys and the Land at Lee High Road also take the local	2	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	No change.

		'marker' and add 50%. So will the Land at Lee High Road be able to justify 22 floors (15 + 7), and then the Sainsbury site go to 33 floors (22 +11) ? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Where are the improvements to the public realm and green spaces going to come from if you build on any space bigger than a postage stamp ?			
3	LEA	**1. Do you have any comments on the proposed vision?** The vision is fine, but the level of growth at Lee Green should be very carefully considered. A local centre is not a district centre and over development of Leegate will be detrimental to the neighbourhood. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** The Council should establish maximum building heights and housing density and commercial provision for the three redevelopment sites, especially Leegate, and agree what associated communit infrastructure is required. These principles should be incorporated into a Lee Green SPD asap. I fear it is already too late given the existing consents for Leegate. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre Sainsbury's Lee Green Land at Lee High Rd and Lee Rd **6. Please provide your comments on the site allocation(s) selected above.** The East Area draft Plan suggests the development capacity of Leegate is c450 homes, already a high numbers. It now seems that Galliard Homes are seeking permission for up to 630 homes, 33% more. Lewisham need to establish proper parameters for an appropriate scale of development for all sites to ensure the quality and size of the new homes is in accordance with the high quality design it seeks on these new developments. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** All three sites should be required to included retail and commercial space at the ground floor in order to encourage active frontages on this busy pedestrian intersection. Despite the impact of COVD on retail, it is important that Lee Green remains, and is encouraged to be an improved local retail centre. The addition of residential units on the three sites will mean that shops will be more viable and local residents, as now, will walk from Blackheath and Manor House to use them. Loss of shops and any food retail would mean increased driving to supermarkets causing	2	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

		more congestion. Lewisham should ensure appropriate local retail and commercial provision at Lee Green is retained in the Plan.			
3	LEA	**1. Do you have any comments on the proposed vision?** Forgive me, but the vision for Leegate Shopping Centre cannot be described as merely 'redevelopment'. The 'vision' actually consists of high-rise, high-density housing on a massive scale - that's what I see in the actual plans. If building 'up to 630' new homes is part of the vision - or even, frankly, say 200 new homes, it is more of a nightmare than a vision. Just go to downtown Lewisham to see the hideousness that would result. **2. Do you have any comments on the proposed key objectives?** This is just waffle. All this material contains huge quantities of waffle, presumably there to camouflage bad proposals. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** The latest proposals for replacing the Leegate Centre seem to be far worse than earlier ones. It seems to be all concrete and no space, totally out of character with the surrounding area. Has it occurred to anyone to actually reinstate a green at Lee Green? **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre **6. Please provide your comments on the site allocation(s) selected above.** The latest proposals from Galliard Homes are appalling. It looks line a mini Canary Wharf. The cynicism is breathtaking. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Earlier proposals for the Leegate redevelopment were much more acceptable.	4	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change
3	LEA	**1. Do you have any comments on the proposed vision?** The proposal to regenerate the LeeGate centre is fantastic as its an eyesore. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** The Galliard homes development has too many houses! You can’t fit another 630 homes in to the area when the infrastructure is already broken. There will have to be new dr surgeries along with schools created. Lee / Hither Green stations can’t cope with the current amount of commuters (pre Covid) so there’s no way another 630 homes will help that.	0	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below Leegate shopping centre **6. Please provide your comments on the site allocation(s) selected above.** I am so pleased you are finally going to grant planning permission to fix this eyesore. Please don't back down because of minority local groups thinking they know best. The area has been run in to the ground in the time people have been arguing about it. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** I object to the height of the development. I believe it should be low rise I.e 8-10 stories to stay in keeping with the local area. Please consider adding an area for cafe culture and restaurants			
3	LEA	**1. Do you have any comments on the proposed vision?** Agree with vision in principle and particularly support improved permeability for pedestrians/ cyclists. Too many current sites (eg Sainsbury's, chiltonian) are only accessible from one or two directions and with a bit mire thought and planning could be much easier to access. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds LEA4: Linear network of green infrastructure **4. Please provide your comments on the topic(s) selected above?** Strongly support green corridor idea and better access to the Quaggy. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Sainsbury's Lee Green Leegate Shopping Centre Land at Lee High Rd and Lee Rd **6. Please provide your comments on the site allocation(s) selected above.** Agree with permeability proposals. I would like to see height restrictions to about 5 storeys on the Sainsbury's Leegate and Lee high road sites. More in keeping with existing historic buildings. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	4	Support noted regarding vision. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	No change.
3	LEA	**1. Do you have any comments on the proposed vision?** limit the height of the developments - it is a bit ironic that there are so many constraints for houses with a large part of this territory being conservation areas	3	Tall building policy amended in response to additional evidence base.	The Local Plan is underpinned by a Transport Assessment and other key documents such as the Councils

		when those developments can pretty much do what they want. Allow at the same time garages in conservation areas to be transformed into granny houses as there is a real demand and not enough care homes. **2. Do you have any comments on the proposed key objectives?** they are very good - This part of London is a jewel and should not be ruined by developments that will destroy its appearance, greenness and the local community spirit that goes beyond the Lee/Blackheath separation or Greenwich/Lewisham boroughs separation, which is a big success. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Sainsbury's Lee Green Leegate Shopping Centre **6. Please provide your comments on the site allocation(s) selected above.** Height should be limited to 6 floors. Buildings should have a bike garage each and bike roads and trees promoted to try to get families without cars or limit their use, with also a nursery and small primary school within the building. A look and feel like the Riverstone School on Eltham Road would be even better. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Traffic jams - Without adding a tunnel under the crossing I cannot see how this would work. Or there must be something to force the Lee High road users & vans to take the A205. Lack of bike pathways in the whole area and lack of child-safe crossings on Lee High Road between Lee Green and Blackheath Improve the security and the look and feel of the Hither Green station (adding an environmentally-friendly glass bridge for example to exit the station directly from the station platform to the Fernbrook road)		The Local Plan supports the London Plan target of ensuring that 90% of all trips in London are made by sustainable modes of transport. All development within Lee Green will be car-free or car-lite in accordance with the London Plan parking standards.	Transport Strategy and Local Implementation Plan.
3	LEA	**1. Do you have any comments on the proposed vision?** Any developments must fit with the character of the area and avoid the excessive over-building of architecturally dubious blocks of flats that have rendered The area around Lewisham station hideous. **2. Do you have any comments on the proposed key objectives?** The character of local areas should be maintained and nothing should happen with out proper consultation with residents living in those areas. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds	3	With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. In response to the consultation the Council has prepared additional evidence on Tall Buildings.	Tall building policy amended in response to additional evidence base.

		4. Please provide your comments on the topic(s) selected above? The council must resist building excessive residential provision without strengthening the infrastructure that supports those extra residences. Rather than building blocks of flats the council should focus on building family homes. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre Sainsbury's Lee Green Land at Lee High Rd and Lee Rd Mayfields Hostel, Burnt Ash Hill **6. Please provide your comments on the site allocation(s) selected above.** Care should be taken with any planning applications for these sites so that they are not over-built with more residences than the local area can sustain. Consideration should only be given to projects that add architecturally worthy buildings that add to the streetscape rather than buildings which emulate those that have been built round Lewisham station. Family homes should be prioritised over and above blocks of flats or high density housing. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Electric vehicle infrastructure should be strengthened and residents encouraged to make the change to battery powered vehicles.			
3	LEA	**1. Do you have any comments on the proposed vision?** I understand that new properties have to be constantly be built to meet the demand for new homes however I am deeply concerned about the additional density in an already built up area with no plans/conditions for additional infrastructure, schools, med facilities, traffic management, parking, road infrastructure etc. To be implemented alongside. The sites highlighted as suitable for additional homes could add considerable demands on an already overstretched community. We do not have sufficient space in existing schools to cater for more children. Already it is difficult to get into a school in your immediate vicinity. Equally doctors are overstretched. Our roads are congested and there is little parking. If we are to add to the housing stock all of this needs to be addressed within the local plan and within any planning applications. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre	3	With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan. In response to the consultation the Council has prepared additional evidence on Tall Buildings.	Tall building policy amended in response to additional evidence base.

		Sainsbury's Lee Green Land at Lee High Rd and Lee Rd Southbrook Mews Travis Perkins and Citroen garage **6. Please provide your comments on the site allocation(s) selected above.** As above plus - Leegate should remain as mixed use (housing/retail/community) to ensure it can fulfill it's original purpose as a town centre destination. It should not be turned just into with additional housing as this will mean the area loses a focus and town centre - and then just becomes residential with a supermarket totally changing the character of the area. To this end I strongly object to anything being built over the height of the current tallest buildings ie Leybridge estate directly behind Leegate. Nothing should be taller than current buildings. This height should be the maximum to maintain the current town centre feel and not turn the area into a new high rise centre which will overshadow the current surroundings. Leegate development should be a mix of heights with the height of Leybridge being the maximum. If the other areas are developed I believe that the heights should actually be lower - maybe max 5 stories to fit in with the surrounding and neighbouring houses and not overshadow them.5 stories will already do this so I believe the height for these areas should be included and restricted in the local plan. I also believe that if those areas are developed then they should have a mix use - residential above retail - to increase the interest and potential of the area for small businesses. With regard to the Sainsbury's site I think it should be stipulated that this area must include a supermarket regardless of what other development takes place at the site . **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LEA	**1. Do you have any comments on the proposed vision?** I am worried that Leegate does not have a maximum height included in its site allocation. I would all the site allocations to include an actual number of maximum stories. I am also worried that there is no mention of building to human scale, with generous public realm, set backs and articulations to reduce any sense of scale. I would like all these details spelled out in policies and site allocations Here is the kind of text I would like to see included (taken from Houslow's Great Western Corridor Masterplan and Capacity Study 2019) ' 'Where the height differential between areas with different height approaches is more than two storeys, the abrupt change in height creates an imbalance and breaks the coherence of the urban fabric''. ''Higher development may feel domineering and undermine the integrity of buildings with lower height''. ''Generally heights should overcome strong height differentials through the stepping down of development at the interface with public realm''. ''Buildings may have one or two set-back storeys behind the main frontage. Due to their limited visibility from the street space set-back storeys have little impact on the perceived building height or enclosure of the street space''. ''The approach is to promote mid-rise buildings rather than very tall buildings, as they will be better able to avoid or limit harm to heritage assets''. ''There will be occasions where a tall or bulky development of a certain scale is simply unacceptable due to the potentially destructive effects on the	4	In response to the consultation the Council has prepared additional evidence on Tall Buildings. As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan.	Tall building policy amended in response to additional evidence base.

		setting of heritage assets''. ''The higher a building, the greater will be its propensity for harm, fuelled by developer ambition rather than any genuine pressing economic, regenerative or environmental driver''. I would also like to see this kind of wording from Historic England's Tall Building guidance included in Lewisham's Local Plan ''There will be some locations where the existing qualities of a place are so distinctive or sensitive that new tall buildings will cause harm regardless of the perceived quality of the design'' and that ''conservation area appraisals identify areas of increased sensitivity to tall buildings'' **2. Do you have any comments on the proposed key objectives?** I am worried that Lewishsm has no infrastructure levy planned spending in Lee Green yet has site allocations that will bring around 2,000 new homes to the area. I would the plan to clearly spell out where and how increased infrastructure will be brought about **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Developers are required by planning policy to design height, mass, scale, detailed design (including materials) and public realm appropriately in response to local context. Lee Green has significant heritage assets and average transport links. Lewisham has excluded Lee Green from it's Tall Building opportunity areas in its draft Local Plan. No buildings in Lee Green should therefore be taller than the 11 storey Leybridge. Morevoer, the Leybridge Estate is set back from public realm with plenty of space between the towers. So too should any proposed taller buildings be. Building must be on a Human Scale with generous and contextual public realm, setbacks, articulation and materials that reduce the impression of scale Green.			
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?**	5	With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. All development within Lee Green will be car-free or car-lite in accordance with the London Plan parking standards.	No change.

		N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Agree in principal with regenerating the area and creating new homes but this needs to be strategically planned and big questions considered. How will we be living 20 years from now? Currently demand for green space, houses with gardens and local amenities are high as people are working from home more. The climate emergency is much bigger than the Covid-19 pandemic and carrying on as we are is not sustainable. Any changes to Leegate need to take these factors on board. Any new dwellings need to be eco friendly and use renewable energy. They need to be places where people want to live - probably houses or low rise flats with gardens. Sainsbury's is a good sized store, not too big nor too small. The small, friendly businesses sprouting up are also good. The New Tiger's Head grocery store is superb. These serve the community well and attract people from further afield. What is missing is more green space and (CO2 emission mitigating) trees for people to enjoy. This could easily be factored in when designing new homes on Leegate. Please don't build high density, high rise units and open a superstore. This is unsustainable and, logistically, could not be supported by Lee Green. Ask yourself, who would want to live in a high rise block on the Lee Green junction where air and noise pollution is pretty appaulling? This is not kind to people desperate to find somewhere nice to live. Finally, consider the traffic problems. Any amendments to Lee Green will have traffic implications. The area already struggles with high traffic and this needs to be carefully considered. How do we optimise our limited space? Do we want new homes for people or car parks?			
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** The proposed development is disproportionate for the area. Obviously Leegate needs improvement but this development is too big, too high and will negatively impact the area in terms of traffic which is already bad and not being addressed by	2	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process. All development within Lee Green will be car-free or car-lite in accordance with the London Plan parking standards.	No change.

		LBC. The plans for Leegate appear to be depressingly similar to the high rise development of central Lewisham which I think have been a wasted opportunity. Are flats even the right solution for the community? ....a smaller development of houses with great spaces for small business to thrive would be more appropriate. Lee Sainsbury's is a vital supermarket for the area which allows people to shop locally without driving.....any threat to this would be appalling and again in sharp contradiction to LBC aims to drive down car use. Any plans need to also factor in the negative impact on these areas of the LTNs which has concentrated traffic and pollution in these roads. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre Sainsbury's Lee Green Land at Lee High Road and Lee Rd **6. Please provide your comments on the site allocation(s) selected above.** This is an over development of an already busy area. These roads are already clogged with traffic and recent LTNs have made this much worse. The addition of a large number of homes will ruin the area. Given LBC are anti car will these new homes be built without car parking space? If built with car parking space then this is completely out of line with your environmental goals. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Too many residential units. Buildings are too high and not aligned with the character of the area. What provision is being made to increase public transport, schools, doctors etc etc in line with this large population increase?			
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** Leegate redevelopment should not be too large. There isn't sufficient infrastructure to support it **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre **6. Please provide your comments on the site allocation(s) selected above.**	2	This response seems to be relating to proposals currently being prepared by Galliards for the Lee Gate site and is not part of this Local Plan consultation. Residents will have the opportunity to express their views on the scheme through the Development Management process.	No change.

		I have seen a plan with 450 new residences at Leegate. Far too high, far too large. The area simply won't be able to accommodate that many new people, not enough supporting infrastructure **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Redevelop Leegate but in a controlled and sensible manne			
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate Shopping Centre **6. Please provide your comments on the site allocation(s) selected above.** Leegate will be a test of the ambitions to preserve heritage, good design reflecting the local character, greening, improving air quality, taller buildings meaning only 1-2 storeys higher than surrounding buildings. I hope these ambitions are honoured. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Any proposals submitted for planning will be assessed against relevant planning policies.	No change.
3	LEA	**1. Do you have any comments on the proposed vision?** I am neutral about this as we have had this "vision" discussed for so long and still nothing has happened to improve Leegate, so why should I think it is going to happen this time? If you want these areas - Grove Park, Lee, Blackheath Village to be welcoming and for the local shops to thrive, there must be provision for the parking of cars. No everyone can cycle walk or use public transport. LTNs are hindering this "vision". **2. Do you have any comments on the proposed key objectives?** The green spaces definitely need to be preserved with better access for everyone. The opening up of the River Quaggy will need support from neighbouring Greenwich. The South Circular and Lee High Road will never be "healthy streets" as they are the main way in and out of Catford & Lewisham. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** Lea2: Lee Green district centre and surrounds LEA4: Linear network of green infrastructure	1	The Local Plan has to be in broad conformity with the London Plan which sets a target for 90% of trips in the Capital to be by sustainable modes. The draft Local Plan policies support the aspiration of reducing car use where ever possible including supporting Healthy Streets and reducing carparking. With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. In response to the consultation the Council has prepared additional evidence on Tall Buildings.	Tall building policy amended in response to additional evidence base.

		4. Please provide your comments on the topic(s) selected above? All the sites are at a cross roads junction and any development should not be higher that 5 storeys to keep the height of the new buildings in line with the old buildings ie Old & New Tiger Head pubs, the police station which is now flats and the fire station on Eltham Road. This should be accessible to everyone with good signage cafe & public toilets. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Leegate shopping centre Sainsbury's Lee Green Land at Lee High Road and Lee Rd Mayfields Hostel, Burnt Ash Rd **6. Please provide your comments on the site allocation(s) selected above.** This needs to be developed so new business' want to come. There needs to be public space preferably in the locations that have sunshine; the 3 London Plane trees must NOT be destroyed. There needs to be parking for shoppers and 450 new flats/houses are too many for this site as another high rise should NOT be built and any residents will need parking allocated. The Community Centre should be part of this development and be on the ground floor. Why is this being redeveloped for more housing, when Sainsbury's is the only supermarket in the area now that Iceland has gone from Leegate Shopping Centre. Don't waste money developing a site that serves the community well. Any development should include access to the River Quaggy, and any new buildings should be kept to the height and design of the existing terrace, including the kept which should be retained. What happened to the plan for this site that were discussed at the Lee Green Assembly back in 2018? The new buildings should not be more that 5 storeys high so they **do not overshadow the church.** **7. Are there any other issues and/or approaches for the area that you feel should be considered?** There should be a direct bus route to Greenwich.		With regard to the Sainsburys site the London Plan directs Local Authorities to allocate surface car parks and single storey retail for redevelopment in order to make best use of land. The indicative capacities for the site make provision for the Sainsburys to be reprovided on site.	
3	LEA	**1. Do you have any comments on the proposed vision?** I am very pleased to see that you want to improve cycle networks, but these must be permanent fully connected and segregated cycle lanes. Painted lines will not keep cyclists safe and will not result in beginner or family cycle uptake. Areas need to be connect by SAFE cycle routes in order to encourage cyclist who do not fall in the advanced category. We need to move away from vehicle travel for the able, so this needs to be more than a gesture. Funding needs to go in to providing something of substance for cyclists. **2. Do you have any comments on the proposed key objectives?** All of the mention of cycle routes is fantastic, but they need to provide safety away from cars. There is no mention of the route designs or structure. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	2	The Local Plan is a strategic policy document. Proposals for cycle routes are beyond its remit. We will pass your comments onto our Transport team.	No change.

		4. Please provide your comments on the topic(s) selected above? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected 6. **Please provide your comments on the site allocation(s) selected above**. For every 1 mature street tree you have cut down in the last 5 years, you need to plant 5 to replace them. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Sainsbury's Lee Green **6. Please provide your comments on the site allocation(s) selected above.** The Sainsbury's Lee Green allocation should be amended to require the re-provision of a large food store of at least 2,000 sq.m gross suitable for main and bulk food shopping. The existing store provides an invaluable facility that must be replaced with an appropriate alternative. The loss of this vital facility will result in more/longer car borne shopping trips from the Lee Green area to food stores further afield. This will increase traffic congestion and air pollution. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	The indicative site capacities makes provision for Sainsburys to be reprovided on the site.	No change.
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below**	5	The indicative site capacities makes provision for Sainsburys to be reprovided on the site.	No change.

		None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Sainsbury's Lee Green **6. Please provide your comments on the site allocation(s) selected above.** Reading between the lines, it seems there's consideration to getting rid of the Sainsbury's in Lee Green for mixed use development. This is the only supermarket in the local area, and a considerably long way from any other in terms of travel time. Has there been any consultation with local residents on this? I would be surprised if even 1 person said this supermarket isn't needed. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LEA	**1. Do you have any comments on the proposed vision?** It lacks of detail and just talks about same old, safe claims.... **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA3: Strategic Area for Regen, Grove Park **4. Please provide your comments on the topic(s) selected above?** I'd like you to commit to ensuring Grove Park supports local community and also helps to tackle poverty in the area. I am most certain that one of the main things to look at which would help achieve the above goals is to consider what role in community and how it supports the residents businesses such as Coral betting shop and way too many unhealthy fast food shops in such a small area of Grove Park station junction. Also, very important to keep the grade listed Baring Hall Hotel as a pub or similar social venue. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Sainsbury's / Land west of Grove Park Station **6. Please provide your comments on the site allocation(s) selected above.** It would be interesting to consider if Grove Park really needs two local stores of the main supermarkets as well as numerous off-licence shops. Also, care should be taken of dormant businesses such as a Polish shop on Downham Way side of the junction. The shop has been closed for several years now with shatters down. It adds to the grim look of the Grove Park station area and doesn't serve any purpose to the community.	2	The Local Plan is a strategic Policy document and has to be proportionate in terms of detail. The Local Plan has policies to control the proportion of fast food takeaways and betting shops within any centre. Please see policy EC17 Concentration of Uses	No change.

		7. Are there any other issues and/or approaches for the area that you feel should be considered? N/A			
3	LEA	**1. Do you have any comments on the proposed vision?** In the summary document items, 2 and 10 are exactly the same! I would also suggest planting more trees or plants, especially in built-up areas. Blackheath Village can benefit from attracting more visitors with arts and literary festivals or routine markets around the All Saints Church for example. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA1: East Area place principles LEA2: Lee Green district centre and surrounds **4. Please provide your comments on the topic(s) selected above?** It would be a great shame to replace Leegate Shopping Centre with copycat highrise development stuck on top of a supermarket. What we need is somewhere that will provide housing but also give the opportunity for the independent local businesses to thrive. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	4	With regard to the indicative capacity for the site allocations within Lee green we appreciate that this will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.	No change.
3	LEA	**1. Do you have any comments on the proposed vision?** Disappointing lack of detail on Blackheath Village and options for pedestrianisation, including removing the unsafe and unnecessary one way system, which puts cars first with little space for pedestrians and cyclists. **2. Do you have any comments on the proposed key objectives?** Absence of detail on Blackheath village, one of the Boroughs most popular tourist destination. I hope this is an oversight and not because Blackheath village sits on the boundary of the borough. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A	3	The Local Plan is a strategic policy document. The plan has introduced a more granular approach with policies and spatial strategy for each sub area. It is not possible to have detailed strategies for each neighbourhood within the borough. This could be pursued through the Neighbourhood Planning process.	No change.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
Lewisham East Area		1. Do you have any comments on the proposed vision? Following the implementation of the LTN the Grove Park Ward has suffered disproportionately through the displaced traffic, turning a significant number of roads into new rat runs. Therefore, any improvement plans will be set against the problems residents face in getting around their immediate area and will not use the proposed improvements, such as Lee Green as you simply can't get there !! 2. Do you have any comments on the proposed key objectives? The objectives are supported, but Lewisham's ability to implement these is questionable, given how the LTN has been handled with what appears to be a total lack of understanding if the plans/proposals don't work. If they adopt the same attitude it will simply be a nightmare if they don't listen and react residents concerns either during or once implemented 3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below LEA3: Strategic Area for Regen, Grove Park 4. Please provide your comments on the topic(s) selected above? The Grove Park Ward suffers from a high level of commuter traffic and unless that is addressed and at the heart of any proposal, everything implemented will not serve the residents as they simply can't take advantage of it or move around the ward freely in a safe and pleasant way 5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below None selected 6. Please provide your comments on the site allocation(s) selected above. N//A 7. Are there any other issues and/or approaches for the area that you feel should be considered?	1	The Councils latest position on LTNs can be found on the Councils website. The Local Plan sets out a number of policies to reduce traffic within the borough and take a healthy street approach to routes within the borough.	No change.

		Measures to address commuter traffic existing the A2 and A20 across the Grove Park Ward would bring immediate benefits open up the green spaces and increase use of local amenities			
3	LEA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LEA3: Strategic Area for Regen, Grove Park LEA4: Linear network of green infrastructure LEA5: East Lewisham Links LEA2: Lee Green district centre and surrounds 4. **Please provide your comments on the topic(s) selected above?** Good, but does not go far enough. No mention of the value of the Quaggy river that runs through this area and is an important green corridor. I'd like to see improvements to the green chain walk which is really uninviting - particularly where it crosses the railway into Downham. Traffic calming on Baring Road and Burnt Ash Hill has not worked and more is needed to slow traffic and separate cyclists from traffic. A dedicated cycle way on this route would have benefit of narrowing the road and slowing traffic. More should be done to open up the green corridor alongside the railway line between Grove Park station and the South Circular for walking, cycling. Are by bus station and garage in Gove Park needs wholesale greening. I would also like to see footpath in front of the shops opposite Grove Park station closed and diverted along the shop fronts. This would be safer as traffic pulling into and out of the parking has seen lots of near misses and the old path could be planted to improve air quality. The large open space on corner of Chinbrook road and Baring road should also have raised bedding added to improve the environment and improve pedestrian safety and isolation from road traffic. Regarding Lee Green regeneration. The main traffic junction here is dangerous for all users and needs major redesigning. A solution must be found for Lee Gate which produces a genuine community hub but also provides extensive greening to reduce impacts of pollution. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	3	Noted The Local Plan is underpinned by the Parks and Open Space strategy that outlines a series of improvements to the borough's green infrastructure. We will pass your comments on to our Parks team.	Reference to Quaggy river included throughout the plan.
3	LEA	**1. Do you have any comments on the proposed vision?** Who would want to come here if you can't drive and park. Not everybody can cycle or walk	1	Lewisham has declared a climate emergency and is committed to reducing private vehicular traffic to reduce carbon emissions and improve air quality.	No change.

		2. Do you have any comments on the proposed key objectives? N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LEA	**1. Do you have any comments on the proposed vision?** Healthy Neighbourhoods in all areas should be a priority, to ensure safe and healthy passage to school for all children, less polluted residential areas, more options for exercising with safe cycling and walking routes for all ages. Smaller residential roads not built for the volumes of cut-through traffic, and larger main roads still requiring traffic reduction measures. **2. Do you have any comments on the proposed key objectives?** The Leegate centre is in desperate need of development to make it a more desirable and usable shopping destination and area for community facilities. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	7	The Local Plan sets out strong policies on Health Streets in accordance with TFL guidance.	No change.
3	LEA	**1. Do you have any comments on the proposed vision?** N/A	4	The Local Plan is a strategic policy document underpinned by evidence such as the Transport	No change.

		2. Do you have any comments on the proposed key objectives? N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Concerning improving the road network. Please can you put more effort into enforcing the existing 20mph limit, how many fines have been issued? As far as I can tell more drivers ignore the limit than observe it. Please can you put in more table style speed humps like there are on Burnt Ash Hill on Lee Road. Also to make life easier for pedestrians remove the on pavement parking on Lee Rd and replace it with on street parking. In Blackheath Village take steps to limit through traffic. At well know bottlenecks , where traffic queues, ensure that regualtions are in place to prohibit standing with idling engines and then enforce strongly.		Strategy and Local Implementation Plan. We will pass your comments onto our Transport team.	
3	LEA	**1. Do you have any comments on the proposed vision?** Just that 2 and 10 are the same **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	Disagree	No change.

3	LEA	**1. Do you have any comments on the proposed vision?** Not sure about the structure of the area. How much local knowledge went into the thinking? **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	The Local Plan was underpinned by the Characterisation study 2019. This was prepared in collaboration with our Neighbourhood Forums, Amenity and Heritage societies and other neighbourhood groups. It was then subject to public consultation where anyone could have their say. If there are specific errors in the document then please let us know.	No change.
3	LSA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LS!4: A21 corridor / Bromley Rd **4. Please provide your comments on the topic(s) selected above?** Concern re claim to create green streets on Bromley Rd - MUF recommended no new housing on Bromley Rd unless back from the road and units had alternative windows to open away from main road **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Downham co-op Beadles Garage **6. Please provide your comments on the site allocation(s) selected above.** Downham Way Co-op with Downham Tavern The proposal which seems to require demolition of the existing Co-op and Downham Tavern as well as use of the car park for housing for re-provision of the co-op on ground floor with it not being clear what if anything would replace the pub	0	Downham Way Co-op with Downham Tavern – The site allocation has a development requirement - Retention or appropriate re-provision of the public house, in line with Policy EC19 (Public houses). The indicative site capacities make provision for the coop to be reprovided. Beadles Garage – the indicative capcity indicates a small proportion of ground floor town centre uses. Known Sites not included in South Area – There is little in the way of substantial sites (those over 0.25ha) in the South of the borough other than around Lower Sydenham / Bell Green. Other sites can come forward through the development management. We have also prepared a small sites SPD to encourage sensitive intensification of our more suburban areas in the borough including in the south. With other sites we are not including additional site allocations at this stage in the plan process. However	No change.

		has caused the largest response locally and seems to go against the council's own policy to protect and retain pubs. Loss of the co-op for a considerable time would seriously impact on older people, anyone with mobility issues. Beadles Garage In relation to retail on the ground floor. It seems reasonable to have some retail on Bromley Hill that would be useful for locals I,e newsagent/ corner shop/ launderette/ community run unit with launderette/ cafe / advice services ? It seems unnecessary to extend that to Avondale Rd which is exclusively residential. Housing units on the ground floor on Avondale seem preferable. 7. Are there any other issues and/or approaches for the area that you feel should be considered? Known Sites not included in South Area Concerned about absence of a number of housing sites from this Local Plan which are likely to proceed, some on council-owned land whilst a predominance of sites in South area seem to be privately owned sites which may never see any housing development on. Chingley Close, BR1 – Phoenix have told locals that they are in process of putting in planning application (April 2021) yet this development is missing from South Area. If the rumours that LB Bromley are negotiating with LB Lewisham to extend Bromley Hill Cemetery into the dis-used allotments behind Chingley Close are false and the development is continuing can it please be included in the finalised Local Plan. I applaud the development for its high energy-efficiency but have major concerns about Phoenix adopting the 'shared ownership' model for a significant number of units on this site – as Cllr Paul Bell recently commented that they can be a 'license to print money' if unless they can be regulated more tightly. Concern re parking in adjacent roads as not sufficient parking on development and it is not a car-free development. Hildenborough Gardens, BR1 - Phoenix have only recently announced purchasing this site which might explain its absence from Local Plan. Can it be included in the finalised Local Plan. Concerns that with increase in units in Chingley Close and Hildenborough will result in a large increase in vehicles parking in adjacent streets as well as concerns about the increase in road traffic in the very narrow Swiftsden Way which has parking on both sides and the access into Hildenborough gardens being pretty narrow. Hoping that green spaces in the area are not encroached upon. Downham Community Centre (Wesley Halls), Shroffold Rd. plus adjacent empty site (Bankfoot Rd) BR1 Cannot understand why these two distinct sites that border each other have been left out of the Local Plan. The Bankfoot site has been empty and ready for development for a number of years now yet has been left undeveloped from what I can understand because it was deemed more viable to develop only in combination with the entire Wesley Hall site. I have heard at previous online meetings for the Local Plan that 'land-banking' was not happening much currently – but this appears		these could be reviewed as part of a Local Plan review in the future.	

		to be exactly an example of this – leaving a site empty until it becomes more viable (profitable) to develop. It could be housing people from the housing list by now. Leaving the two sites off the Local Plan might lead local people to think that the Wesley Hall site was now safe from demolition – when I first moved to Downham in 2013 I recall the large public outcry and petition to save the halls as the only community facility in the entire Downham ward. The increase in housing with a decrease in community facilities seems very short-sighted and provision of community facilities under housing would dramatically impact the kind of activities that can take place and the days and times that they could take place and therefore are not like for like replacement of a facility. A council officer at one of the recent online meetings for the Local Plan stated that where community facilities were removed for housing that the replacement would be as good as or enhanced. Can Wesley Halls and Bankfoot Rd site please be included in the finalised Local Plan. Baring Hall Hotel As a privately owned site that has put in repeated planning applications it seems that it should feature somewhere in the Local Plan in order to see what the council could or wouldn't consider on this site in future. Can the Baring Hall site please be included in the final Local Plan.			
3	LSA	**1. Do you have any comments on the proposed vision?** Thank you for providing residents with the opportunity to contribute to the Local Plan. I agree entirely with the Plan's intention to ensure that planning decisions are made in the best interests of neighbourhoods and communities. **2. Do you have any comments on the proposed key objectives?** See below **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA4: A21 corridor/ Bromley Rd **4. Please provide your comments on the topic(s) selected above?** See below **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Beadles Garage **6. Please provide your comments on the site allocation(s) selected above.** Whilst acknowledging that the Beadles Garage Re-development presents a number of opportunities for Lewisham, not least new residential units, based on the existing 'Site Allocation' I have a number of concerns which primarily centre on: A) The likely greater danger at the junction (A21/Avondale Road) itself, where there have been a number of accidents over the years (most recently on the 28 February); B) The likely increase in on-street parking , especially towards the western end of Avondale Road (and which is already used by Beadle's as an effective 'overspill car park');	0	Support for vision noted. It is considered that there is scope for the sensitive intensification of the Beadles Garage site, which the Local Plan supports in order to help meet local needs for housing and commercial floorspace. The indicative development capacity of the site has been established using a standard methodology, as set out in the Site Allocations Background Paper. The actual capacity of the site will be derived through the development management process, where applicants must demonstrate how they will achieve the optimal capacity of the site using the design-led approach, and ensure no significant adverse impact on local amenity, in line with other draft Local Plan policies. The site allocation provides for mixed use development residential, commercial and main town centre uses. The detailed nature of uses within these categories will be established at the planning application stage. Commercial uses in Class E light industrial may be supported subject to amenity/transport considerations, main town centre uses are defined by the NPPF (and broadly include retail, leisure, community and cultural uses). b The Council has consulted statutory consultees on the Local Plan proposals, including Greater London Authority / Transport for London, Metropolitan Police	No change.

		C) The likely increase in traffic on Avondale Road, possibly resulting in more cars exceeding the speed limit and creating additional danger (our road is already a recognised – by the Authorities -speeding 'hotspot') The current Council Notice states that its 'Site Allocation' expectations are that the Beadles Re-development will be for mixed use. It would be helpful if local residents (of both Lewisham and Bromley) could be notified as soon as possible as to the intended actual use of the Site. Whatever the Site's eventual use, parking and traffic considerations must be addressed and improve on the existing situation. It would be helpful to know if the Metropolitan Police and highway authority for the A21 (as a red route and an A road , TfL is the authority) have been approached for their input and, if so, what their feedback has been. I look forward to receiving the Council's response to my and other contributor's feedback into the Consultation/Planning invitation for comments **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		Service and Bromley Council. Their feedback will be used to inform the Regulation 19 stage document. Speed limits are outside the scope of the Local Plan. However, the plan does advocate for Healthy Streets principles in support of sustainable travel, to reduce vehicular dominance and improve safety. The Plan also recognises that transport assessments must be submitted with applications for major developments.	
3	LSA	**1. Do you have any comments on the proposed vision?** I really support the regeneration of the south. Great to see the Council looking at the whole borough. I would just like to see regeneration happen sooner down here. **2. Do you have any comments on the proposed key objectives?** I support them but would like to see more mention of how Perry Hill fits into it. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** Perry Hill LSA5: South Lewisham Links **4. Please provide your comments on the topic(s) selected above?** More focus on Perry Hill as a place. It used be a cute little high street in the 90's/naughties with an independent toy shop and two pubs. But sadly alot of it shops have been lost to ground floor flats and estate agents. Encourage a strong link between Bellingham and Perry Hill. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Perry Hill Tesco **6. Please provide your comments on the site allocation(s) selected above.** There could be some flats on top of this one storey supermarket. It's only short bus ride/cycle into Catford or Beckenham. **7. Are there any other issues and/or approaches for the area that you feel should be considered?**	0	Support for south area vision and key spatial objectives noted. The Perry Hill Tesco site has been considered for an additional site allocation – further details are set out in the Site Allocations Background Paper. The Local Plan is broadly supportive of the sensitive intensification of established residential areas. It is agreed that these areas should not function singularly as dormitories. The Part 1 spatial strategy and Part 2 Economy and Culture policies support the 15-minute neighbourhood concept, and seek to enable a wider range of uses to locate within the town and local centres that support residential areas. At a strategic level, there are key locations that the Local Plan is seeking to promote night-time economic activities.	Local Plan amended to include additional key spatial objective for Perry Hill.

		I know it's a more suburban area but why can't the suburbs have more night life and stuff for young people to do. The assumption that suburbs should be geared towards the nuclear family is dated and heteronormative.			
3	LSA	**1. Do you have any comments on the proposed vision?** I think the proposed vision looks great, my concern would be that there's a heavy assumption on the Bakerloo line extension but this has been ongoing for a long time and given the current crisis, seems likely to be shelved, and there's no where near enough focus on cycling infrastructure and focus on sustainable transport. I think its hugely important to focus on cycling and walking and this can only happen if roads and routes are massively overhauled. For people to take up cycling in any serious way, it needs to be a realistic alternative to driving, this means no cycle barriers or having to dismount at key points, uninterrupted and direct cycle routes, wide cycle only paths and roads. Whole roads (as appropriate) need to be made cycle and pedestrian only. It's not going to be enough just to make pavements mixed use - cycle pedestrian - this just makes pedestrians resent cyclists and vice versa. It's so important to make cycling as easy and accessible as possible but this isn't the case even in areas such as Waterlink Way where mixed use and busy footfall often causes issues and resentment. No one is going to stop driving unless there is an easier and safer way to get around. Roads need to be cycling and pedestrian focused - more pedestrianized streets etc. Lewisham Council must not let a small vocal minority (Alliance of British Drivers etc) override serious positive change. Lewisham has declared a climate emergence and must not let plans be watered down or abandoned (such as the LTNs). **2. Do you have any comments on the proposed key objectives?** MUCH more focus is needed on sustainable transport - CYCLING and WALKING - not just lots of buses. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA3: Bell Green and Lower Sydenham LSA4: A21 corridor / Bromley Road LSA5: South Lewisham Links **4. Please provide your comments on the topic(s) selected above?** Much more cycling safe routes - this means uninterrupted direct cycle routes and cycle filter traffic lights, segregated cycle lanes and so forth. Cycling should not be considered just for leisure and gentle rides - it needs to cater for commuters and people needing to get places quickly - this means direct, safe and dedicated routes for cyclists - not using back residential roads or long hilly detours. People are resistant to behavior change so the way to do this is to make it an easy choice for them rather than still allowing motor vehicles to be the priority. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.**	0	Support for vision noted. The Regulation 18 Local Plan document set out several spatial strategy options, recognising that some or all phases of the BLE may not be delivered in the plan period (including for reasons of funding). The preferred approach for the spatial strategy is therefore not dependent on the BLE. However the spatial strategy and the Local Plan policies aim to facilitate the delivery of the BLE, and provide flexibility to respond to it. This includes provision for an uplift in site development capacities enabled by the BLE through higher public transport access levels, particularly in the Bell Green and Lower Sydenham area. The Council is committed to supporting and enabling the delivery of the BLE through the Local Plan, but a pragmatic approach is necessary to ensure the spatial strategy is sound. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies, including policy TR3 Healthy streets as part of healthy neighbourhoods. The draft Local Plan includes a new Lewisham Links policy, which seeks to promote and secure new and improved links to and between green/open spaces. Waterlink Way features prominently in the plan, including the South Area section.	No change.

		N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** More green corridors such as Waterlink way to link parks such as Beckenham Place Park - at the moment you have to cross a busy, dangerous and polluting main Southend road. theres no crossing and its too car focused. There needs to be prime focus on cycling and green routes but also make direct fast cycling routes. Lowering pollution should also be a huge key priority.			
3	LSA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA2: Bell Green and Lower Sydenham **4. Please provide your comments on the topic(s) selected above?** Bell Green is already overly congested: dangerous, speeding, noisy traffic is a blight on the local area. There is very little provision for pedestrians and cyclists. Perry Rise and Perry Hill are both already severely congested by traffic: I am very concerned that redevelopment could make this problem even worse. It is welcome that the Local Plan aims to repurpose the site into a mixed residential site, but if this is to be achieved, the issues around road layout, traffic, congestion, and pedestrian access must be resolved first. As a first small step, speed limit signs and enforcements should be improved. There should be a way in which traffic can be diverted so as to make the area more pleasant for local residents and for pedestrians. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Former Bell Green Gas holders Bell Green Retail Park Sainsbury's Bell Green **6. Please provide your comments on the site allocation(s) selected above.** The Bell Green retail site, whilst providing important and well-used shops, is a very unattractive and neglected tract of land. This is partly because it is not designed for pedestrian-use: there is only one pedestrian crossing, situated in an unhelpful position, and the level of traffic is extremely prohibitive to pedestrians, cyclists, and families. The bus stops are in an appalling state of misuse. One small but significant issue is the fact that so many refuse bins in Lewisham do not have lids! They are left to overflowing, especially over the weekends, and rubbish is blown by the wind across Bell Green, as well as being disrupted by birds and animals. Access to/from the Waterlink Way to Sainsburys and Bell Green is also unpleasant: the bus turning circle blocks off access to this important and much-loved green space. **7. Are there any other issues and/or approaches for the area that you feel should be considered?**	0	The Local Plan acknowledges the issues of traffic and pollution, connectivity and poor quality public realm within parts of the Bell Green and Lower Sydenham area. To help address this, the South Area vision, objectives and policies (including strategic site allocations) provide the basis for the comprehensive regeneration of the out-of-centre retail park and other sites to create a new high quality and mixed-use neighbourhood. The Council will continue to liaise with key stakeholders, including the Mayor of London / Transport for London to address issues around the road network and public transport improvements required to support the levels of planned growth. Speed limits are outside the scope of the Local Plan. However the Local Plan policy TR3 Healthy streets as part of healthy neighbourhoods seeks measures to reduce vehicular dominance and both encourage and enable movement by walking and cycling. The draft Local Plan broadly seeks to protect and enhance Lewisham network of green infrastructure, including parks, open spaces and waterways. It includes a new Lewisham Links policy, which seeks to promote and secure new and improved links to and between green/open spaces. Waterlink Way features prominently in the plan, including the South Area section.	Local Plan amended to include additional key spatial objective on Perry Rise / Perry Hill.

		Traffic/speeding/congestion/noise and air pollution are my principal concerns. South Area feels like it is a mass cut-through for large numbers of traffic. Local residents, especially families, and pedestrians are disadvantaged. The noise and air pollution is a serious concern. It is important to address this problem to ensure that the volume of traffic can be absorbed in a way which ensures the safety and comfort of local residents. The green areas (Beckenham Place, Waterlink Way and River Pool) are wonderful local assets which must be protected and enhanced by creating more local green spaces, planting more trees, and more habitats for local wildlife. These green spaces also need to be connected up. Pedestrian and cyclist access to these green spaces must be improved: at the moment residents of Sydenham and Catford are discouraged from walking/cycling to Beckenham Place because of the busy roads so they often drive, thus adding to the congestion problems. Improving walking and cycling routes will connect the borough, deal with congestion, and make the local area far more pleasant.			
3	LSA	**1. Do you have any comments on the proposed vision?** LTN on Gleneagles road means traffic increasing on Rangefield Road Valeswood and Alexandra Crescent, Avondale. It doesn't seem popular and many locals couldn't afford fines. Grove Park Corridor /Nature Reserve should be valued. **2. Do you have any comments on the proposed key objectives?** Locals throughout Lewisham are wary of too much intensification. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA3: Bell Green and Lower Sydenham **4. Please provide your comments on the topic(s) selected above?** This area will always have a lot of motorized traffic. New road layout, crossing points welcome. Half of Sainsburys car park should be turned into a Park to offset the fumes not built on for more housing. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** All lewisham and other London plans are based on population increases. BUT people are having less children , life expectancies are static or lowering, COVID deaths and deaths associated with Covid, like untreated cancers etc,,long Covid etc. SO THIS MIGHT NOT HAPPEN.There is a human need for a healthy environment..not brick and concrete, more greening and open spaces(even car parks count) . However much its pushed ,cycling is for the few not the many. . Older people, cars being status symbols, disabled, those with work tools, the rain, snow convenience, time, shopping, young children etc, etc,,	0	Noted. Low Traffic Neighbourhoods are outside the scope of the Local Plan. The draft Local Plan broadly seeks to protect and enhance Lewisham network of green infrastructure, including parks, open spaces and waterways. The Council has commissioned evidence base studies to inform the designation of open spaces and nature sites, including in the Grove Park area. Support for proposals concerning transport improvements noted. The site allocation for the Sainsbury's site in Bell Green sets out requirements for the delivery of new public open space and river restoration. The amount of open space will be considered through the preparation of a masterplan and the planning approval process. The Local Plan covers a 20-year period. The draft Local Plan was largely prepared before the peak of the Covd-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues The Council is required to review its adopted Local Plan every 5 years and consider the scope for changes informed by monitoring and new evidence. The review process will allow for consideration of the longer term impacts of Covid-19 and Brexit.	Additional evidence base documents will be prepared and inform the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections.

3	LSA	**1. Do you have any comments on the proposed vision?** How will the vision be realised? It was made clear in the briefings that these were just guidelines and not firm plans. Where will the money come from to execute the vision? **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA2: Strategic Area for Regeneration LSA1; South Area place principles LSA3: Bell Green and Lower Sydenham LSA4: A21 corridor / Bromely Road LSA5: South Lewisham Links **4. Please provide your comments on the topic(s) selected above?** Please can you ensure that you maintain the excellent local retail shops including those at Bell Green. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Bell Green Retail Park Sainsbury's Bell Green Lidl, Southend Lane Worsley Bridge Rd LSIS Homebase / Argos, Bromley Rd Downham Co-op **6. Please provide your comments on the site allocation(s) selected above.** **Please ensure that these excellent facilities are maintained.** **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Yes please ensure that there is sufficient water pressure for the planned house/flat developments. There is insufficient pressure now in the South Catford area and adding more homes without fixing the infrastructure will only make things worse. I don't remember seeing provision of water included in the vision nor increase in doctors, schools, hospital beds etc etc	0	Noted. Part 4 of the Local Plan sets out details on plan delivery. In short, the Local Plan will be delivered by a wide range of partners including the Council, developers/landowners, government bodies and other key stakeholders. The Infrastructure Delivery Plan (IDP) provides further information on the key infrastructure projects (including for social infrastructure) and funding required to support the levels of growth planned. The draft Local Plan Part 2 policies on Sustainable Design and Infrastructure include provisions around wastewater and water supply, and will ensure that new development proposals consider and are appropriately supported by this type of infrastructure. The Local Plan proposals for the Bell Green and Lower Sydenham area provide for the comprehensive regeneration of existing out-of-centre retail units and park. The policies enable an element of retail and commercial floorspace will be retained/re-provided through new mixed-use developments.	No change.
3	LSA	**1. Do you have any comments on the proposed vision?** Adequate lighting, green bus stops with sedum roofs which absorb pollution and more trees planted along all main roads. Protected cycle ways, along main routes. **2. Do you have any comments on the proposed key objectives?** Adequate lighting, green bus stops with sedum roofs which absorb pollution and more trees planted along all main roads. Protected cycle ways, along main routes. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA3: Bell Green and Lower Sydenham LSA4: A21 corridor / Broomley Rd	0	Noted. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies, including policy TR3 Healthy streets as part of healthy neighbourhoods. The draft Local Plan Part 2 design policies seeks to ensure that developments make appropriate provision for adequate lighting, particularly in the public realm.	No change.

		LSA5: South Lewisham Links **4. Please provide your comments on the topic(s) selected above?** Adequate lighting, green bus stops with sedum roofs which absorb pollution and more trees planted along all main roads. Protected cycle ways, along main routes. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** Adequate lighting, green bus stops with sedum roofs which absorb pollution and more trees planted along all main roads. Protected cycle ways, along main routes. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Adequate lighting, green bus stops with sedum roofs which absorb pollution and more trees planted along all main roads. Protected cycle ways, along main routes.		Provision of bus stops is normally made by Transport for London. The Local Plan is broadly supportive of greening measures, including on these structures where feasible.	
3	LSA	**1. Do you have any comments on the proposed vision?** I welcome the idea that the redevelopment of Bell Green area will be "informed by the local community, ensuring the area is well integrated with existing neighbourhoods and communities." At the moment, it's clear to see that development in this area was not thought through, resulting in huge car parks, poor pedestrian access and busy, polluted roads. But while it's good to see proposed improvements to this area, I am concerned about whether the local area can support the "significant amount of new housing" proposed, especially if public transport is not prioritised. **2. Do you have any comments on the proposed key objectives?** I was pleased to see that protecting and enhancing green spaces are a priority I worry that the designation of Bell Green as an "opportunity area" will lead to over development - as seen all over London where small flats are crammed in to ensure maximum profits for the developers. This would create even more traffic, pollution and rubbish problems in an already congested area. I would welcome a consideration for longer-term, more considered development which takes into account people's quality of life, access to green space and amenities, etc. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA3: Bell Green and Lower Sydenham **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Former Bell Green Gas Holders Bell Green Retail Park Sainsbury's Bell Green **6. Please provide your comments on the site allocation(s) selected above.**	1	Noted. The Local Plan acknowledges the issues of traffic and pollution, connectivity and poor quality public realm within parts of the Bell Green and Lower Sydenham area. To help address this, the South Area vision, objectives and policies (including strategic site allocations) provide the basis for the comprehensive regeneration of the out-of-centre retail park and other sites to create a new high quality and mixed-use neighbourhood. The Council will continue to liaise with key stakeholders, including the Mayor of London / Transport for London to address issues around the road network and public transport improvements required to support the levels of planned growth. The Local Plan proposals for the Bell Green and Lower Sydenham area provide for the comprehensive regeneration of existing out-of-centre retail units and park. The policies enable an element of retail and commercial floorspace will be retained/re-provided through new mixed-use developments. In general, the Council is seeking to make a more optimal use of the existing retail parks in Bell Green and considers there is scope for the sensitive intensification of this area, with key opportunities linked to the delivery of the Bakerloo line extension. The Local Plan has set out indicative development capacities for site allocations in Bell Green and Lower Sydenham using a standard methodology – further details are in the Site Allocations Background Paper. The optimal capacity of these sites, and appropriate building heights, will be	Local Plan amended to include additional key spatial objective on Perry Rise / Perry Hill.

		While it is useful to have these large supermarkets nearby - there are not many larger stores within a walking distance - the retail park and gas holder sites do need improvements. It's poorly designed, ugly, pedestrian access is very poor (or non existent), and more needs to be done to improve access to the Waterlink Way. For this reason, I would support the removal of the Bell Green gyratory, in favour of a less high-density solution. I welcome the use of brownfield sites for redevelopment, rather than greenfield, but I worry about the large numbers of housing proposed on the gas holders. I am concerned they would not be integrated into the local area without significant re-design of the roads - they could be unconnected at the end of the cul-de-sac, creating yet another cut off estate. High-rise developments like we have seen in Catford and Ladywell would not go well with the 'suburban' residential character of the area. I also worry that large amounts of housing/retail would disrupt the quiet nature of the Waterlink Way. The area is already littered with rubbish from the retail park and this affects wildlife and river life. I am also concerned about the comment that parking for these new developments will reflect future public transport provision. Parking and over-reliance on cars is a huge issue in the borough, but the solution is not to provide parking for residents. This will not stop people from having a car; they will simply push the problems into nearby residential roads. I would urge you to join up improvements in public transport and infrastructure with large developments, rather than relying on them to happen in a few years' time. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Perry Hill and Perry Rise are already extremely busy roads, where no one obeys the 20mph limit. This is particularly worrying due to the Brent Knoll special school. I am concerned about the increase in traffic and the pressure on these routes from new developments at Bell Green, both in terms of the residents, and the construction vehicles.		established through the design-led process at the planning application stage. The draft Local Plan broadly seeks to protect and enhance Lewisham network of green infrastructure, including parks, open spaces and waterways. It includes a new Lewisham Links policy, which seeks to promote and secure new and improved links to and between green/open spaces. Waterlink Way features prominently in the plan, including the South Area section. It is an asset that the Local Plan is seeking to support and enhance and not compromise. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies, including policy TR3 Healthy streets as part of healthy neighbourhoods and TR4 Parking.	
3	LSA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** Such a shame to lose Sainsbury's. It's always busy. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Downham Co-op Homebase / Argos, Bromley Rd **6. Please provide your comments on the site allocation(s) selected above.**	0	Noted. The Local Plan proposals for the Downham Coop and Bromley Road Retail Park will enable an element of retail and commercial floorspace to be retained/re-provided through new mixed-use developments. For the Bromley Road Retail Park, the site allocation would not preclude the re-provision of a similar, large format retail store or retail warehouse, however it is likely that this would require a re-configuration of the existing building and site layout. The proposals are considered to be in line with the London Plan, which provides a steer for Local Plans to deliver new housing through the mixed-use redevelopment of car parks and low-density retail parks and supermarkets.	No change.

		Homebase will be much missed. It's very popular. Maybe it could still have a smaller Homebase or similar store on site. As for the Co-op. Absolutely ridiculous idea to get rid of it. Where else are we meant to go? Remember the elderly who can't get to Burnt Ash Lane or Grove Park on their own. This is the most stupid redevelopment plan I've ever heard of. My motto is why change something if it's not broken. We've got plenty of housing in this area. I've lived here for 37 years. I remember the old Co-op. Don't be so silly as to take away an essential part of our community. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LSA	**1. Do you have any comments on the proposed vision?** The proposal looks like a positive proposal for improving a large area of land that could create a more positive place to live and improve the wellbeing of people that live there. Bell Green lacks a centre / heart and this leads to anti social behaviour. This would create more of a community ethos. I fully support the regeneration of this area. **2. Do you have any comments on the proposed key objectives?** I agree with the objectives. Improved transport links will support the improvement of this area of opportunity. The proposed bakerloo line extension is a life line to this area that has do much potential. This area feels as though it is a significant distance from central London but it actually isn't. The investment would create a new residential and commercial hub tht would be incredibly exciting to live in. I fully support the proposal for the regeneration of this area. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA1: South Area place principles LSA2: Strategic Area for Regeneration LSA3: Bell Green and Lower Sydenham LSA5: South Lewisham Links **4. Please provide your comments on the topic(s) selected above?** I agree with the approaches for the area. It is a sensible plan to connect this area to the surrounding areas and make this area an attractive place to live. The concept of the garden city provides a fitting and exciting proposal for the area and will connect with the history of the area. The transport links are poor and the bakerloo line extension would provide a life line for this area. Improved pedestrian access and pathways will make the area a much better area for people to live in **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Former Bell Green Gas Holders Bell Green Retail Park Sainsbury's Bell Green Worsley Bridge Rd LSIS Homebase / Argos, Bromley Rd	0	Support for South area vision and key spatial objectives and area-based policies noted. The Local Plan proposals for Bell Green retail park and other surrounding site allocations will enable an element of retail and commercial floorspace to be retained/re-provided through new mixed-use developments. It is recognised that the existing businesses provide important amenities and job opportunities for local residents, and the Council is seeking to ensure that the comprehensive regeneration of sites in Bell Green and Lower Sydenham continue to make such provision through the creation of a new town or local centre, albeit in a different format from the existing out of centre retail park. The proposals are considered to be in line with the London Plan, which provides a steer for Local Plans to deliver new housing through the mixed-use redevelopment of car parks and low-density retail parks and supermarkets. Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.	Following the Regulation 18 stage consultation, a new Retail Impact Assessment and Town Centre Trends Study has been commissioned. This has assessed the potential scope for a new town centre at Bell Green and impact this would have on neighbouring centres. The Local Plan has been amended to reflect the objective for a new local centre at Bell Green.

		6. Please provide your comments on the site allocation(s) selected above. These areas have been well thought out and utilise the spaces well to include the essential amenities including b and q and Aldi and some of these should be kept in the area to support jobs and investment. The shops on the bell green estate are an important hub for the area that cannot be found nearby. These should be considered as part of the regeneration plan and could form part of commercial/retail area in the plans. The range of supermarkets enable this area to be affordable for key workers and those on lower incomes. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** The bridge leisure centre. A sports / fitness facility is vital for the well-being of this area. To close or not replace it with an affordable alternative would be detrimental to the community's wellbeing. The newest swimming pool is at the north of the borough and this would be a shame to loose this one.			
3	LSA	**1. Do you have any comments on the proposed vision?** I see no mention of a sports centre, particularly for sports such as badminton that cannot be played outdoors. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA3: Bell Green and Lower Sydenham **4. Please provide your comments on the topic(s) selected above?** Again no mention on The Bridge sports centre, can this be re-built to a modern spec? **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected 6. Please provide your comments on the site allocation(s) selected above. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Just an indoor sports facility for badminton and exercise classes	1	Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.	No change.
3	LSA	**1. Do you have any comments on the proposed vision?** While it is exciting that the Borough have plans to spruce up Bell Green & Lower Sydenham, it is frightening to read that you intend to redevelop the existing commercial infrastructure (such as the supermarket & retail park) without any details of their prospective replacement. **2. Do you have any comments on the proposed key objectives?** The proposals are very ambitious but I fear there is a possibility that whatever replaces the current infrastructure will be less convenient for local residents. Perhaps our little corner of the Borough isn't as aesthetically pleasing as other areas but it serves us well.	2	Noted. The Local Plan proposals for Bell Green retail park and other surrounding site allocations will enable an element of retail and commercial floorspace to be retained/re-provided through new mixed-use developments. It is recognised that the existing businesses provide important amenities and job opportunities for local residents, and the Council is seeking to ensure that the comprehensive regeneration of sites in Bell Green and Lower Sydenham continue to make such provision through the creation of a new	Following the Regulation 18 stage consultation, a new Retail Impact Assessment and Town Centre Trends Study has been commissioned. This has assessed the potential scope for a new town centre at Bell Green and impact this would have on neighbouring centres. The Local Plan has been amended to reflect the objective for a new local centre at Bell Green.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below LSA3: Bell Green and Lower Sydenham **4. Please provide your comments on the topic(s) selected above?** Could you please clarify if you will be allowing the existing retailers to remain in the retail park (Sainsbury's, Next, B&Q etc.)? They employ a great many local residents and are very conveniently located. Removing the supermarket and B&Q in particular would not be convenient for many local residents. The layout of the car parks and roadways can and should be modified into something more elegant & intuitive to navigate, however. The opportunity is there to integrate whatever residential or commercial structures you develop in the Gas Holders & modify the existing retail park. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Sainsburys Bell Green **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** The Bridge Leisure Centre requires investment from the council. Before the pandemic it was in desperate need of repair but it was still essential for residents' health and well-being. If it is to be closed permanently then I might suggest a replacement swimming pool and leisure centre be built nearer the proposed 'town centre', perhaps at one of the gas holder sites. My young children need swimming lessons & other services (such as gymnastics) that the Bridge provided, and as it stands we will need to drive to other parts of the Borough, clogging up roads and polluting our way there.		town or local centre, albeit in a different format from the existing out of centre retail park. The proposals are considered to be in line with the London Plan, which provides a steer for Local Plans to deliver new housing through the mixed-use redevelopment of car parks and low-density retail parks and supermarkets. The detailed design of the redeveloped sites will be considered through the masterplan and planning application process. The site allocations set out development requirements and guidelines concerning road layout and public realm, which will help to delivery significant improvements to access and connectivity within the area. Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.	
3	LSA	**1. Do you have any comments on the proposed vision?** The existing shops in the Bell Green retail park should remain - if it wasn't for Sainsbury's, Aldi, Next, Currys and B&Q lockdown would've been a lot harder. **2. Do you have any comments on the proposed key objectives?** What about leisure facilities. The Bridge leisure has suffered from a lack of investment over the last 10 years and is now facing permanent closure. Why haven't leisure facilities been included in your vision or objectives? How do you expect residents to keep fit and healthy? **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA3: Bell Green and Lower Sydenham **4. Please provide your comments on the topic(s) selected above?** One glaring omission is any mention of The Bridge leisure centre which is facing permanent closure. The centre has suffered from a lack of investment for the past 10 years. The area needs somewhere where residents can keep mentally and physically fit.	1	Noted. The Local Plan proposals for Bell Green retail park and other surrounding site allocations will enable an element of retail and commercial floorspace to be retained/re-provided through new mixed-use developments. It is recognised that the existing businesses provide important amenities and job opportunities for local residents, and the Council is seeking to ensure that the comprehensive regeneration of sites in Bell Green and Lower Sydenham continue to make such provision through the creation of a new town or local centre, albeit in a different format from the existing out of centre retail park. The proposals are considered to be in line with the London Plan, which provides a steer for Local Plans to deliver new housing through the mixed-use redevelopment of car parks and low-density retail parks and supermarkets.	No change.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below Bell Green Retail Park Sainsbury's Bell Green **6. Please provide your comments on the site allocation(s) selected above.** All these stores must remain as they have been a lifeline for many residents. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** You must revise your vision and plans to include leisure facilities for residents in the Lower Sydenham area.		Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.	
3	LSA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA4: A21 Corridor / Bromley Rd **4. Please provide your comments on the topic(s) selected above?** I really don't see how you could turn the busy A21 into a 'healthy street'. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Bell Green Retail Park Sainsbury's Bell Green Lidl, Southend Lane Excalibur estate Homebase/ argos, Bronley Rd **6. Please provide your comments on the site allocation(s) selected above.** I can see there is some wasted space in these retail sites, but planning applications must include some provision for car parking, as it would be impossible to manage a family shop or purchase of heavy DIY materials on a bus. The current situation regarding the Excalibur estate is worrying, as a number of units remain unsold after several years. Part of the delay is due to building faults, but the sale price is probably too high for local families to afford. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** I hope the Council will insist on a good percentage of genuinely affordable properties in all applications, as that is the only way we will start to tackle the housing crisis.	0	Noted. The Local Plan seeks to enhance the place qualities of the A21/Bromley Road Corridor, including through delivery of significant public realm improvements to support walking, cycling and use of public transport (and reducing vehicular dominance). Whilst recognising this is a major road in London's strategic network, it is considered that there are opportunities to apply the 'Healthy Streets' principles in accordance with the London Plan. The Council is preparing the A21 Development Framework to support the Local Plan, and will provide further details on the delivery healthy streets along the corridor. Where existing retail sites come forward for mixed-use redevelopment, the amount of car parking provision will be established in line with the London Plan parking standards. The sale of properties on Excalibur estate is outside the scope of the Local Plan. Through the new Local Plan, the Council is proposing to set a strategic target for 50% of all new housing to be genuinely affordable homes, with affordability linked to local income levels. Further details are set out in draft Local Plan Policy HO3 genuinely affordable housing.	No change.
3	LSA	**1. Do you have any comments on the proposed vision?** I fully suppor the development of new housing, particularly that which is affordable. But removing so many local amneties raises questions about driving people into cars rather than being able to walk to get what they need from garden centres and food	1	Support noted. The Local Plan proposals for Bell Green retail park and other surrounding site allocations will enable an	No change.

		shops. Ensuring that existing residents have access to greater numbers of amneties rather than fewer is crucial. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA3: Bell Green and Lower Sydenham **4. Please provide your comments on the topic(s) selected above?** A mixed-use approach is really important. It will be vital to ensure that there are options for small retail and hospitality businesses beacuse currently the area around Bellingham Green really lacks both facilities and a neighbourhood, villagy feel. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Lidl, Southend Lane Sainsbury's Bell Green **6. Please provide your comments on the site allocation(s) selected above.** Removing both Southend Lane's supermarket and those at Bell Green are going to leave Bellingham residents with very few shopping options and drive them from being able to visit the supermarket on foot to having to travel via car, which goes against the intentions of the scheme to make the area greener and more environmentally friendly. Doing this for 23 houses doesn't seem to make a lot of sense to me. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Ensuring there are sufficient leisure facilities to cope with the influx of people this will bring. The proposed closure of the Bridge Leisure Centre is a huge blow to the community, with the pool in particular something which can't be made up for by other centres.		element of retail and commercial floorspace to be retained/re-provided through new mixed-use developments. It is recognised that the existing businesses provide important amenities and job opportunities for local residents, and the Council is seeking to ensure that the comprehensive regeneration of sites in Bell Green and Lower Sydenham continue to make such provision through the creation of a new town or local centre, albeit in a different format from the existing out of centre retail park. The Part 2 policies on Economy and Culture seek to ensure that a wide range of business units and unit sizes are delivered in employment locations and town centres. Similarly, the proposals for the Lidl, Southend Lane site will allow for mixed-use development, and would enable the provision of retail uses at the ground floor level with residential above. Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.	
3	LSA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected 4. **Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected	4	Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.	No change.

		6. Please provide your comments on the site allocation(s) selected above. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** With all the proposals for properties where will the residents have to keep healthy in body and mind if you close The Bridge Leisure Centre. This must be kept open. Why can't some funding be used to upgrade the facility to attract more people. Kangley Bridge Road and the surrounding area is very residential and with the proposed rail link to east london will be even more popular. You must keep it open			
3	LSA	**1. Do you have any comments on the proposed vision?** I think it is really exciting **2. Do you have any comments on the proposed key objectives?** Very excited about the improvements to. bell green - it's an awful experience using Bell Green by foot. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA3: Bell Green and Lower Sydenham **4. Please provide your comments on the topic(s) selected above?** This area needs a lot of investment and it can only be a good thing. I like the ambition of the plans - even if they cannot be fully realised it's great to see that the council recognised that improvement and investment are desperately needed. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Former Bell Green Gas Holders Bell Green Retail Park Sainsbury's Bell Green 6. **Please provide your comments on the site allocation(s) selected above**. Yes to the proposed redevelopment of this site - it is awful. However I do understand the concerns about the alternatives for the retail provision currently provided and the associated employment **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	Support for South area vision and objectives noted. The Local Plan proposals for Bell Green retail park and other surrounding site allocations will enable an element of retail and commercial floorspace to be retained/re-provided through new mixed-use developments. It is recognised that the existing businesses provide important amenities and job opportunities for local residents, and the Council is seeking to ensure that the comprehensive regeneration of sites in Bell Green and Lower Sydenham continue to make such provision through the creation of a new town or local centre, albeit in a different format from the existing out of centre retail park.	No change.
3	LSA	**1. Do you have any comments on the proposed vision?** I welcome the improvement of The south of the borough. We live in an area which is poorly served by buses and is stuck with a huge and ugly retail park. We have beautiful green spaces which are poorly connected. It would be great to have the opportunity to have things rethought and redesigned. I'm really shocked by the negative reaction I have seen. **2. Do you have any comments on the proposed key objectives?** Very excited that Bellingham and Bell Green are both selected for regeneration and redesign. Excellent for the area. Also excited about the redesign of the road away from Haseltine Primary and the raised profile of the Waterlink Way	0	Support for South area vision and objectives noted. The Local Plan proposals for Bell Green retail park and other surrounding site allocations will enable an element of retail and commercial floorspace to be retained/re-provided through new mixed-use developments. It is recognised that the existing businesses provide important amenities and job opportunities for local residents, and the Council is seeking to ensure that the comprehensive regeneration of sites in Bell Green and Lower Sydenham continue to	No change.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below LSA3: Bell Green and Lower Sydenham **4. Please provide your comments on the topic(s) selected above?** Very exciting. Concerned about the proposed heights of some blocks- would like them kept to 6 stories, or to keep the higher blocks towards the existing high blocks around Perry Hill side rather than putting towers in the area where everything is low. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Former Bell Green Holders Sainsbury's Bell Green Bell Green Retail Park **6. Please provide your comments on the site allocation(s) selected above.** Where will people do their home improvement shopping if B&Q and Homebase are both redeveloped? I understand this concern. But I still think creating a new mixed-use town centre is a great idea. Bell Green retail park is not pleasant - it is positively unpleasant if you are a pedestrian user. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Keep the Bridge Leisure - do not take away this important amenity.		make such provision through the creation of a new town or local centre, albeit in a different format from the existing out of centre retail park. In general, the Council is seeking to make a more optimal use of the existing retail parks in Bell Green and considers there is scope for the sensitive intensification of this area, with key opportunities linked to the delivery of the Bakerloo line extension. The Local Plan has set out indicative development capacities for site allocations in Bell Green and Lower Sydenham using a standard methodology – further details are in the Site Allocations Background Paper. The optimal capacity of these sites, and appropriate building heights, will be established through the design-led process at the planning application stage, having regard to the Part 2 design policies of the Local Plan.	
3	LSA	**1. Do you have any comments on the proposed vision?** I find the retail park at Bell Green convenient but as a pedestrian user I hate it. Everything is run down and litter-strewn, and the car parks are rarely full. I feel that better use could be made of the spaces there without losing all the retailers currently in situ. Any way of increasing Bell Green's connectivity via public transport wound be welcomed- it should be served by more bus routes. **2. Do you have any comments on the proposed key objectives?** The plan to make Bell Grn into a new 'town centre' is exciting- many are concerned though that it will create a large employment loss. Where would the next nearest B&Q be? What opportuniies would a Bell Grn town centre bring for local people to find employment? **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA3: Bell Green and Lower Sydenham LSA5: South Lewisham Links **4. Please provide your comments on the topic(s) selected above?** The plan to make Bell Grn into a new 'town centre' is exciting- many are concerned though that it will create a large employment loss. Where would the next nearest B&Q be? What opportuniies would a Bell Grn town centre bring for local people to find employment? Personally, I'm happy to shop largely online and as a resident without a car, I detest both the supermarket and walking along the gyratory and would LOVE to see the ambitious changes described in the plan. But I'm see many	1	Noted. The Local Plan proposals for Bell Green retail park and other surrounding site allocations will enable an element of retail and commercial floorspace to be retained/re-provided through new mixed-use developments. It is recognised that the existing businesses provide important amenities and job opportunities for local residents, and the Council is seeking to ensure that the comprehensive regeneration of sites in Bell Green and Lower Sydenham continue to make such provision through the creation of a new town or local centre, albeit in a different format from the existing out of centre retail park. The proposals for Bell Green would also provide for the introduction of transformational public realm improvements, including the provision of new publicly accessible open space. The draft Local Plan provides that any future development proposals for the Bell Green area and site allocations must be delivered through an area-wide masterplan approved by the Council, and comply with the relevant site allocation policies. However, it is acknowledged that the Local Plan could make clear that	Local Plan Policy LSA3 amended to make clear that the masterplan for Bell Green area must be informed by a public consultation process.

		people disagree and how will the proposed changes satisfy the fears outlined above (well-used centre /Bell Grn being untenable for development)? **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Former Bell Green Gas Holders Bell Green Retail Park Sainsbury's Bell Green **6. Please provide your comments on the site allocation(s) selected above.** I would love to see this horrible retail park (Bell Grn) transformed into a pleasant public space with more public transport. I like the ambitious vision for the site but echo the concerns of others about whether it's practical. If redevelopment meets with strong opposition, what other improvements could be implemented which allay people's fears? E.g. if the plans are dropped, can the site's pedestrian acces be made better, can the gyratory be changed, can we open up the green corridor behind Aldi etc and connect it to Perry Vale abs the river walk? Can we at least secure the promise that it will be less horrible? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Don't close The Bridge Leisure Centre, it's a HUGE loss. If you're trying to bring life to/ improve Bell Grn, please don't remove important community infrastructure without a plan to replace it		the masterplan must be informed by public consultation. Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.	
3	LSA	**1. Do you have any comments on the proposed vision?** Please see below in respect of Policy LSA3 and Site Allocations 2 **2. Do you have any comments on the proposed key objectives?** The objective of redeveloping the Bell Green Retail Park is unrealistic and undeliverable. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA3: Bell Green and Lower Sydenham **4. Please provide your comments on the topic(s) selected above?** This draft policy in so far as it relates to the Bell Green Retail Park is considered unrealistic and undeliverable. The Bell Green Retail Park contains a large number of established retailers such as Aldi, Pets at Home, Next, B&Q, Halfords, Currys/PC World & McDonalds. These retailers have in most cases a significant number of years left to run on their leases. It is a highly successful retail park providing an accessible and quality shopping environment which is well established. There is no realistic prospect of this site becoming available for redevelopment for the wide range of uses as promulgated within Policy LSA3. The policy suggests that this is a long-term development which will be guided by a Supplementary Planning Document and/or Masterplan including a reconfiguration of existing out-of-centre provision. There is no information on how this can be delivered over the plan period nor whether there has been any engagement with the landowner as the key stakeholder. It fails to accord with paragraph 16b) of the NPPF which states that	1	The Local Plan sets out a strategy and policies for growth and investment over a 20 year period. There is nothing that we have heard through the preparation of the plan and through this Regulation 18 consultation that suggests Bell Green Retail Park is not deliverable within this timeframe. We have had engagement with landowners in the area.	Timeframe for delivery amended for each site allocation.

		plans should be prepared positively in a way that is aspirational but also deliverable. It also fails to accord with paragraph 16c) of the NPPF in that there has been no early or effective engagement with businesses. There is no reference in the plan to stakeholder engagement in respect of these matters nor more significantly, whether the retail park will become available for redevelopment as envisaged, over any part of the plan period. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Bell Green Retail Park **6. Please provide your comments on the site allocation(s) selected above.** The Site Allocations 2 outlines a timeframe for delivery of a mixed-use redevelopment with between 695-1,710 residential units delivered between 2020 and 2030. There is no realistic prospect of this being achieved given the existing tenants and their unexpired leases coupled with the need to prepare a masterplan or SPG. The development requirements are also challenging in seeking to deliver as part of any redevelopment, new and improved public realm, provide full integration with the surrounding area and protect and enhance green infrastructure including Metropolitan Open Land and the Pool River. The draft site allocation should be deleted from the plan. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LSA	**1. Do you have any comments on the proposed vision?** I cannot see how a greener area will come about. Lewisham have already decided not to build the footbridge over Catford station which would stop everyone squeezing onto the south circular bridge to get into Catford. Instead there are to be paving stones outside the station. If this essential green item is not necessary, will Lewisham decide others aren't either? 2. **Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA3: Bell Green and Lower Sydenham **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Land at Pool court Sainsbury's Bell Green Lidl, South end **6. Please provide your comments on the site allocation(s) selected above.**	0	Noted. At its meeting on 16th September 2020 Mayor & Cabinet agreed the transfer of S106 funding originally proposed for the delivery of a footbridge between Doggett Road and the Barratt's development on the former Catford Greyhound Stadium site to be used to deliver a programme of public realm and accessibility improvements to Catford Station areas. This includes looking at options to provide step free access at Catford Station. See M&C report for further details. The National Planning Policy Framework requires the Council to identify and plan positively for the housing needs of the gypsy and traveller community through the Local Plan process. The site allocation will help to ensure these requirements are satisfied. The Council has considered site options through previous work on a standalone Gypsy and Traveller site Local Plan, which is now being absorbed into the consolidated Local Plan. Noted. The Local Plan proposals for Bell Green retail park and other surrounding site allocations, along with Lidl Southend Land will enable an element of retail and commercial floorspace to be retained/re-provided through new mixed-use developments.	No change.

		Land for travellers? The area is already extremely with lorries waiting to make deliveries to the cash and carry opposite. Where will we be able to do our shopping if you take both supermarkets away. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** I think if you are truly a green borough, you will reinstate the footbridge to connect the station up with the town centre.			
3	LSA	**1. Do you have any comments on the proposed vision?** No vision for developing downham... the area is in serious need of better access to green spaces, local centre around co-op to be improved, et **2. Do you have any comments on the proposed key objectives?** Doesn't go far enough to improve local smaller playgrounds/green spaces/nature reserves around grove park/downham. Many is a state of disrepair or under threat of developers. All the attention going on Beckenham Place park. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** Downham has been forgotten in these proposals but is area most in need of investment/development. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Revive and enhance downham shopping area around co-op. The area is lacking quality basic shops (bakers, butchers, grocers, etc) and is very run down. Improve and invest in the smaller playgrounds in the area. Do more to protect green spaces from developers.	0	Noted. The Local Plan vision for the South area includes references to Downham, particularly around reinforcing its cottage estate character and supporting the long-term viability of Downham district centre. The key spatial objectives and area-based policies support this vision. For example, Downham forms part of the proposed Strategic Area for Regeneration, where there are clear policies in place to facilitate and direct investment within the area. Despite a comprehensive survey of land available for potential redevelopment across the Borough, as set out in the Site Allocations Background Paper, there are a lack of potential development sites / site allocations for the Downham area. However the Council considers that there is not a lack of focus for Downham, as set out above. The Part 2 policies on Green Infrastructure address the protection of green and open spaces, and set out how identified deficiencies in children's play provision will be addressed.	No change.
3	LSA	**1. Do you have any comments on the proposed vision?** We are residents of Avondale road, and we are looking to create a collective protest letter for the proposed development plan on the land owned by Beadles Bromley who is looking at proposed development with Lewisham council for multiple (about 22) residential dwellings and more commercial dwellings. **2. Do you have any comments on the proposed key objectives?** The proposed plan for the Avondale road area seems to have been planed with no resonance with the resident's requirements and a worsening of the emissions on this street, in addition to more traffic, parking and potential accidents that the street is already prone to.	0	Residents have had the opportunity to engage with the Local Plan process through the Regulation 18 consultation. The consultation has been carried out in accordance with our Statement of Community Involvement. We believe the site presents a good opportunity for redevelopment to improve the urban fabric of the area and deliver much needed housing.	No change.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below LSA4: A21 corridor / Bromley Rd **4. Please provide your comments on the topic(s) selected above?** Avondale Road and Bromley hill junction area as a location is a very residential space. It has had more of its fair share of accidents, (a couple of them being more recent), and huge problems associated with attracting car thieves on the street, followed by VW hogging the road space for parking their commercial cards, in some cases blocking homes. With these additional developments, there will be more pressure on parking from new residents and their guest, and from the commercial outfits thereof, in addition to the Beadles own overflows on the street. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Beadles Garage **6. Please provide your comments on the site allocation(s) selected above.** The proposed plan for the Avondale road area seems to have been planed with no resonance with the resident's requirements and a worsening of the emissions on this street, in addition to more traffic, parking and potential accidents that the street is already prone to. The proposed plan for the Avondale road area seems to have been planed with no resonance with the resident's requirements and a worsening of the emissions on this street, in addition to more traffic, parking and potential accidents that the street is already prone to. Avondale Road and Bromley hill junction area as a location is a very residential space. It has had more of its fair share of accidents, (a couple of them being more recent), and huge problems associated with attracting car thieves on the street, followed by VW hogging the road space for parking their commercial cards, in some cases blocking homes. With these additional developments, there will be more pressure on parking from new residents and their guest, and from the commercial outfits thereof, in addition to the Beadles own overflows on the street. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Avondale Road and Bromley hill junction area as a location is a very residential space. It has had more of its fair share of accidents, (a couple of them being more recent), and huge problems associated with attracting car thieves on the street, followed by VW hogging the road space for parking their commercial cards, in some cases blocking homes. With these additional developments, there will be more pressure on parking from new residents and their guest, and from the commercial outfits thereof, in addition to the Beadles own overflows on the street.			
3	LSA	**1. Do you have any comments on the proposed vision?** I get the feeling that your plan starts from the premise that what we have today is bad and everything has to change. Clearly you feel that retail parks are bad and I would like to understand why you feel that way. Will your plan include alternative shopping locations to replace the supermarket that you are removing? **2. Do you have any comments on the proposed key objectives?**	0	Noted. The Local Plan identifies and seeks to reinforce and enhance the different elements of the borough that make a positive contribution to Lewisham's distinctiveness, including the built and natural environments, as well as community diversity and cultural character. The proposals for Bell Green retail park and other surrounding site allocations will enable an element of	No change.

		The objectives are certainly lofty and I am sure well intentioned. BUT this manic push for cars to be banned and everybody to walk/cycle etc is flawed. Already we see that mixing cyclists and walkers on the same track is a dangerous proposition. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA4: A21 corridor /Bromley Rd **4. Please provide your comments on the topic(s) selected above?** As you seem to be driving more and more housing in Lewisham where are the proposals for extra hospitals, doctors surgeries, schools, social services etc etc **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Bell Green Retail Park 6. Please provide your comments on the site allocation(s) selected above. This site provides a very useful facility for all in the borough which also provides many many jobs. What will replace the jobs lost? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Yes a true mix of housing and services including retail. New have seen that with Lewisham's LTNs that without proper consultation things are being driven through. In this case you are consulting but will you listen? As an example my particular road, Crantock Road, was consulted on whether we wanted speed humps. We said NO and you ignored us. I worry about your ideological approach to all development. You ask for feedback on something that you have created but then very little change when objections come in.		retail and commercial floorspace to be retained/re-provided through new mixed-use developments. It is recognised that the existing businesses provide important amenities and job opportunities for local residents, and the Council is seeking to ensure that the comprehensive regeneration of sites in Bell Green and Lower Sydenham continue to make such provision through the creation of a new town or local centre, albeit in a different format from the existing out of centre retail park. The proposals are considered to be in line with the London Plan, which provides a steer for Local Plans to deliver new housing through the mixed-use redevelopment of car parks and low-density retail parks and supermarkets. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies. Low Traffic Neighbourhoods are outside the scope of the Local Plan. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	
3	LSA	**1. Do you have any comments on the proposed vision?** All very noble, but I am very sad that every bit of open space around existing facilities will disappear under a blanket of concrete, yet there are comments about people paving their gardens in order to park their cars. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA4: A21 Corridor / Bromley Rd **4. Please provide your comments on the topic(s) selected above?** Please do not fence us in with more overnight road closures. Respect the many people who still need to use cars, all of whom will anyway have to 'go electric' by	1	The draft Local Plan sets out policies to help ensure a balanced approach to managing growth in line with the Good Growth policies of the London Plan. The Part 2 policies on Green Infrastructure set out the approach to protecting and enhancing the Borough's network of green and open spaces. The reference to 'road closures' is assumed to refer to the Low Traffic Neighbourhoods scheme, which is outside the scope of the Local Plan. The proposals for Bell Green retail park and other surrounding site allocations will enable an element of retail and commercial floorspace to be retained/re-provided through new mixed-use developments. It is	No change.

		the time your proposals come to fruition. At the moment, cars idling in traffic jams caused by LTNs cause more pollution that those moving swiftly through. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Bell Green Retail Park Sainsbury's Bell Green Homebase / Argos, Bromley Rd Lidl, Southend Lane **6. Please provide your comments on the site allocation(s) selected above.** Can we assume that businesses in these areas with the services they provide will be wiped out? Is your mission to put them out of business? Tens of thousands of people use them regularly, Where do you propose they relocate that will be accessible to us all? They need parking space as most of them sell large heavy items, not to mention the weekly shop. Will you raise the middle of Catford to make room for them there? I think not. I know, put more home delivery vans on the road!! **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Your comments show residents concern that more leisure facilities are required yet I hear that Lewisham is closing down the Bridge Leisure Centre. Yet another blanket of concrete?		recognised that the existing businesses provide important amenities and job opportunities for local residents, and the Council is seeking to ensure that the comprehensive regeneration of sites in Bell Green and Lower Sydenham continue to make such provision through the creation of a new town or local centre, albeit in a different format from the existing out of centre retail park. The proposals are considered to be in line with the London Plan, which provides a steer for Local Plans to deliver new housing through the mixed-use redevelopment of car parks and low-density retail parks and supermarkets. Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.	
3	LSA	**1. Do you have any comments on the proposed vision?** Seems unfair to close a leisure centre in what already seems a relatively run down area. Won't all these extra houses mean more demand for sport facilities? And what's the impact on people's health longer term? I suspect bridge was picked as the easier option, not the right option, because it's likely people in Bell Green "shout less" than those in e.g Forest Hill. **2. Do you have any comments on the proposed key objectives?** Don't close facilities and services that promote health. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Lidl, Southend Lane Sainsbury's Bell Green **6. Please provide your comments on the site allocation(s) selected above.** Don't close supermarkets. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure. In addition, the draft Local Plan Part 2 policies set out approaches to safeguarding community/social infrastructure. The proposals for Bell Green Retail Park and Lidl, South End lane will enable an element of retail and commercial floorspace to be retained/re-provided through new mixed-use developments. The proposals are considered to be in line with the London Plan, which provides a steer for Local Plans to deliver new housing through the mixed-use redevelopment of car parks and low-density retail parks and supermarkets. Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.	No change.

3	LSA	**1. Do you have any comments on the proposed vision?** We are very concerned that the project proposed in Bromley Hill, corner with Avondale rd t is most probably too ambitious for this specific spot, given the significant raise in the population this would bring. Residents of Swiftsden Way have been made aware that along the Beadles project there are other 2 developments planned by Phoenix Housing Association within very close vicinity, in Chingley Close (of 31 homes) as well as Hildenborough Gardens(numbers have not yet been specified). Should the two developments of Phoenix Housing go ahead as planned, we already anticipate at least a 50 % increase in the local population in Swifsden way and surrounding closes. We feel that the supporting infrastructure is fragile at present as it is and therefore, we are highly concerned about any addition of new developments in this area. The project you are proposing is bordering a highly dense council estate, with narrow streets and an infrastructure as this was 50 + years ago: water supply, sewage issues and equally of electricity supply has not been modernised to allow extra buildings to be added to this. A very evident measure of the overcrowding we are experiencing are the total number of cars parked along in Swiftsden Way, congesting the road to the point that a fire engine cannot get though if needed. Primary and secondary school places are insufficient already for our children and GP practices have too many clients for people to feel valued as individual. Downham has a very high index of deprivation and by raising population density this can be easily pushed further and further. Furthermore, adding social houses into an already deprived area the index of deprivation would be pushed further down than it is. Noise and gas pollution would inevitably increase and so the available space for parking your car. For many of us, access to car is indispensable to travel to work and swapping it for a cycle as desirable as it is it is incompatible with the demands of the jobs we are doing. Bromley Hill has been historically an area with very poor public transport facilities, local busses are hugely overcrowded at peak hours, it is making commuting to work, school a rather unpleasant experience. We would like to ask you to consider this project cautiously for the sake of existing and new residents, to avoid to standardise overcrowding as a norm for urban living. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** further more specific information would be important to understand the proposals made **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Beadles Garage **6. Please provide your comments on the site allocation(s) selected above.**	0	We believe the site presents a good opportunity for redevelopment to improve the urban fabric of the area and deliver much needed housing. The council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital. All development will be car-free or car-lite in accordance with the London Plan parking standards.	No change.

		We are very concerned that the project proposed in Bromley Hill, corner with Avondale rd t is most probably too ambitious for this specific spot, given the significant raise in the population this would bring. Residents of Swiftsden Way have been made aware that along the Beadles project there are other 2 developments planned by Phoenix Housing Association within very close vicinity, in Chingley Close (of 31 homes) as well as Hildenborough Gardens(numbers have not yet been specified). Should the two developments of Phoenix Housing go ahead as planned, we already anticipate at least a 50 % increase in the local population in Swifsden way and surrounding closes. We feel that the supporting infrastructure is fragile at present as it is and therefore, we are highly concerned about any addition of new developments in this area. The project you are proposing is bordering a highly dense council estate, with narrow streets and an infrastructure as this was 50 + years ago: water supply, sewage issues and equally of electricity supply has not been modernised to allow extra buildings to be added to this. A very evident measure of the overcrowding we are experiencing are the total number of cars parked along in Swiftsden Way, congesting the road to the point that a fire engine cannot get though if needed. Primary and secondary school places are insufficient already for our children and GP practices have too many clients for people to feel valued as individual. Downham has a very high index of deprivation and by raising population density this can be easily pushed further and further. Furthermore, adding social houses into an already deprived area the index of deprivation would be pushed further down than it is. Noise and gas pollution would inevitably increase and so the available space for parking your car. For many of us, access to car is indispensable to travel to work and swapping it for a cycle as desirable as it is it is incompatible with the demands of the jobs we are doing. Bromley Hill has been historically an area with very poor public transport facilities, local busses are hugely overcrowded at peak hours, it is making commuting to work, school a rather unpleasant experience. We would like to ask you to consider this project cautiously for the sake of existing and new residents, to avoid to standardise overcrowding as a norm for urban living. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** public transport is limited to buses , all train stations are only 30 min + walking distance street parking is a significant problem, most households have more than 1-2 cars / house access to schools if retail spaces are also added to Beadles Project, underground parking would be essential to address the lack of parking in this area. at present most customers and staff at Beadles Car dealership are taking up at least 300-400 yards of street parking.			
3	LSA	**1. Do you have any comments on the proposed vision?** More focus should be given to improving the area around Bell Green. There is lots of under-utilised space that is perfect for new big housing developments. Roads in the area should be adjusted to help encourage walking and cycling linking with the local parks.	0	Noted. The Council has undertaken a comprehensive survey of land available for potential redevelopment across the Borough, as set out in the Site Allocations Background Paper, and this has been informed by several 'call for sites' exercises. This has focussed on	No change.

		2. Do you have any comments on the proposed key objectives? More focus on housing and improving walking. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LSA3: Bell Green and Lower Sydenham **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Bell Green Retail Park Sainsbury's Bell Green Worsley Bridge Rd LSIS **6. Please provide your comments on the site allocation(s) selected above.** There are brownfield sites In Worsley bridge road which are perfect for housing due to good transport. Walking should be encouraged by improving and updating pavements. The Bell Green and Sainsbury's area should be improved by more high quality housing being built with improved roads and the one way system removed **7. Are there any other issues and/or approaches for the area that you feel should be considered?** One way system should be improved and new housing provided.		sites that are 0.25 ha or larger in size. The Local Plan includes several key strategic development sites which are brownfield sites around Worsley Bridge Road. It is acknowledged that there may be brownfield sites smaller than 0.25 ha which have not been included as site allocations, but which may be appropriate for redevelopment. These are known as 'windfall' sites. The Local Plan policies seek to ensure that development proposals on such windfall sites make the optimal use of land to support the spatial strategy for the Borough. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies. The Part 3 South Area policies provide further details to support this, including a masterplan approach for Bell Green and Lower Sydenham to significantly improve movement and circulation within the area, with priority given to walking, cycling and the use of public transport.	
3	LSA	**1. Do you have any comments on the proposed vision?** The vision to build more housing is welcome, but I don't think that local people or first time buyers are shown any priority in the plans. Most new developments in Lewisham, particularly in Lewisham town centre, are not affordable for a working couple with good incomes, not to mention an individual who wants to buy their first property or a local family **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Downham co-op Sainsbury's Bell Green Bell Green Retail Park **6. Please provide your comments on the site allocation(s) selected above.**	1	Noted. The Local Plan identifies that housing affordability is a significant issue in Lewisham. The draft Local Plan therefore sets a strategic target for 50% of all new homes to be genuinely affordable, with affordability linked to local income levels. Further details are set out in Policy HO4 genuinely affordable housing. The proposals for Bell Green retail park and other surrounding site allocations, along with Downham Coop, will enable an element of retail and commercial floorspace to be retained/re-provided through new mixed-use developments. It is recognised that the existing businesses provide important amenities and job opportunities for local residents, and the Council is seeking to ensure that the comprehensive regeneration of sites in Bell Green and Lower Sydenham continue to make such provision through the creation of a new town or local centre, albeit in a different format from the existing out of centre retail park. The proposals are considered to be in line with the London Plan, which provides a steer for Local Plans to deliver new housing through the mixed-use	No change.

		The proposals reduce the amount of retail available significantly (as building work will take over a year for each site), therefore reducing the shopping opportunities for local residents. Whilst reducing the parking at the Co-Op site might not be detrimental to the area, there will be an issue with the overflow of parking from the new residents onto adjoining roads (particularly Moorside and Capstone). For the Bell Green development, particularly the Sainsbury's, it is the largest shop that many residents from numerous wards can access and parking is crucial as most people use it for large shops that cannot be carried on public transport. Shops like B&Q would also suffer from a reduction in parking as their goods are difficult or even impossible to carry on public transport and the links to many areas are not great. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Existing developments should be considered- there is a large storage place next to Bell Green that is definitely less useful to local residents than the shops, that occupies a large space and that is not in keeping with what is around it (either the housing or the shops). Reducing retail space would be a major loss to many residents.		redevelopment of car parks and low-density retail parks and supermarkets. Car parking provision will on strategic development sites in the South Area will need to be carefully managed, in line with the London Plan parking standards. Overall, the Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies.	
3	LSA	**1. Do you have any comments on the proposed vision?** I do not know enough about this area to comment. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	Noted.	No change.
3	LSA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	2	Noted. The Local Plan broadly seeks to ensure that the Borough is inclusive to people of all backgrounds, ages and abilities. The Council's Parks and Open Spaces Strategy sets out priorities for managing and improving these spaces for the benefit of the whole population, whilst ensuring their character and environmental qualities are maintained and enhanced.	No change.

		4. Please provide your comments on the topic(s) selected above? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Please do NOT ruin Beckenham Place Park by adding child friendly stuff like skate parks/playgrounds etc. There are plenty of other places to take children who are incapable of just enjoying nature. The beauty of Beckenham is that it is UNSPOILT, so let's keep it that way.			
3	LSA	**1. Do you have any comments on the proposed vision?** Whilst I recognise the need for more affordable housing, the vision doesn't seem to adequately reflect the infrastructure required - schools, GP surgeries, shops etc. The density of housing suggested would put a lot of strain on local schools and surgeries, as well as increasing the local traffic on already over-stretched roads. Would there be support (and funding) for widening the railway bridge at Southend Lane? **2. Do you have any comments on the proposed key objectives?** Bell Green's large Sainsbury's is the only large supermarket in the area which is easily accessible for many in Perry Vale, Bellingham and Southend, as well as Sydenham, by foot and by bus. There is no other large supermarket easily accessible without a car. Smaller "local" style supermarkets usually have higher prices and a reduced range. Replacing this supermarket would be detrimental to many who live in the local area. The loss of the rest of the Bell Green retail park, would make many of those who can currently walk to it reliant on home deliveries or on cars to get to further away similar sites - which is not in line with reducing traffic. It's recognised that there are areas of high deprivation, yet these suggestions propose replacing a budget supermarket as well as Sainsbury's, this will contribute to wider food poverty and should be reconsidered. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Sainsbury's Bell Green Bell Green Retail Park **6. Please provide your comments on the site allocation(s) selected above.** Please see my comments above on the need for decent sized supermarkets.	2	The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure. The proposals for Bell Green retail park and other surrounding site allocations will enable an element of retail and commercial floorspace to be retained/re-provided through new mixed-use developments. They will not preclude the retention/re-provision of medium to larger scale supermarkets. It is recognised that the existing businesses provide important amenities and job opportunities for local residents, and the Council is seeking to ensure that the comprehensive regeneration of sites in Bell Green and Lower Sydenham continue to make such provision through the creation of a new town or local centre, albeit in a different format from the existing out of centre retail park. The proposals are considered to be in line with the London Plan, which provides a steer for Local Plans to deliver new housing through the mixed-use redevelopment of car parks and low-density retail parks and supermarkets. Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.	No change.

		7. Are there any other issues and/or approaches for the area that you feel should be considered? The proposed closure of the Bridge Leisure Centre should be reconsidered, and the centre and sports field should be both better maintained and promoted. To make the area more welcoming better lighting and signage should be provided for Kangley Bridge Road.		The council recognises the potential need for the widening and increase in height at Southend Lane bridge. Whilst high level feasibility studies have been prepared in the past no detailed design work has been undertaken. The Council will work with Network Rail to explore options. This is likely to come forward as part of the BLE and/or the comprehensive redevelopment of Lower Sydenham and Bell Green.	
3	LSA	**1. Do you have any comments on the proposed vision?** Re. Dartmouth Road and Upper Kirkdale. The area on Kirkdale up from Willow Way has been an eyesore for several years. It needs bringing up to the standard of the rest of Kirkdale. There is a high rise building already - the old Section House - and another nearing completion - the old Police Station. Why do we need more? Limit any building to 3 or 4 storeys. Let the garage remain. They have been part of the community for decades. And what about the infrastructure? We can't get doctor's appointments now, so it will get worse. Schools? Added issues with the Mais House project. Parking?? **2. Do you have any comments on the proposed key objectives?** Building communities - excellent, but don't destroy what's there now **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	Noted. The key spatial objectives and policies for the West Area address the area around Upper Kirkdale and Dartmouth Road, particularly focussing on the local centres. The Council is preparing the Local Plan to set a positive strategy to deliver sustainable development and meet identified needs for homes, workspace/jobs, town centre floorspace and supporting infrastructure, in line with the National Planning Policy Framework. The London Plan also sets a housing target which the Council must seek to meet through the Local Plan. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	No change.
3	LSA	**1. Do you have any comments on the proposed vision?** Whilst accepting that there is an urgent need for more housing, I strongly oppose this proposal. Local businesses will be affected, particularly The Dartmouth Service Station, a well-established and valued local garage. The infrastructure in the area cannot support more development. There are insufficient school places, local transport links are overcrowded, particularly at peak travel times, it is virtually impossible to get doctors' appointments. This would appear to have been planned with a complete lack of local involvement. I understand that the businesses affected weren't even informed. This is not the way	1	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		to build trust with the local community. I totally oppose the development in this form. **2. Do you have any comments on the proposed key objectives?** See above. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** See above. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure. The Local Plan is being prepared in accordance with the Council's adopted Statement of Community Involvement.	
3	LSA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	Noted.	No change.
3	LSA	**1. Do you have any comments on the proposed vision?** This is a very bad idea. More houses / flats great. But we all still need tge services of a mechanic. Since i moved into the area in 2006 i have been using tge dartmouth road garage. **2. Do you have any comments on the proposed key objectives?**	0	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This

		We still need services. You cant just wipe out services and build houses that will come with cars and rrmove a mechanic from tge heart of the community **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LSA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I am the manager of the Bricklayers Arms Public House. The proposals to redevelop Willow Way and to build up to the perimeter of Bricklayers Arms pub will have an adverse effect on us. Firstly we will lose our car park. We need car parking for our deliveries. Our suppliers need to be able to deliver to our door and not have to find parking elsewhere down the road. Also our staff use the car park. Our staff don't leave until gone midnight every night and having the car park gives them extra security as opposed the having to walk a distance late at night in the dark.	1	Noted. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. The Council recognises the important role that public houses play in the local economy and its Lewisham's distinctiveness. Therefore, the draft Local Plan Policy EC7 (Public houses) sets out a new 'presumption in the favour of the retention of public houses'. This will help to ensure that any future proposals for redevelopment of land within the Willow Way LSIS site fully consider the pub and its amenity through the masterplan and design-led process. However it is acknowledged that the site allocation policy could be amended to provide more clarity on the need to protect the public house and its amenity. The Part 2 polies on High Quality Design set out requirement for all new development to respond positively to local character. Car parking provision at the Willow Way LSIS and its surrounds will need to be carefully managed, in line with the London Plan parking standards. Overall, the Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		Our customers use the car park. Some customers are designated drivers and rely on the car park and some like to leave their cars there securely over night. Building blocks of flats up to the Pub will dramatically change the aesthetics and character of the pub for the worse. A lot of the pub will no longer be visible. There will also be no privacy for our garden customers, as the flats will be directly overlooking the garden and also some of the private upstairs accommodation of the pub will lose privacy. The old Sydenham Police Station, opposite us on Willow Way, which has just been redeveloped and is now a large block of flats is very imposing and now dwarfs the Bricklayers Arms. We have no privacy now upstairs in the private accommodation. The blinds in the living room and bedroom now have to be permanently drawn for privacy. Your plans for the redevelopment of this site, to surround us with more of these overlooking flats will adversely affect us and that is why I oppose them. The Bricklayers like most pubs is just surviving in a tough industry and environment. These issues mentioned will seriously compromise the continued existence of the Bricklayers as a going concern and those employed. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies.	
3	LSA	**1. Do you have any comments on the proposed vision?** The Council must consider more effective measures to reduce the environmental and health impact of car use in Lewisham, such as: • Creating low-traffic neighbourhoods that are protected from motorised through-traffic (as proposed by London Living Streets in response to the Council's consultation in November 2018). • Increasing the use of non A & B roads for pedestrianised entertainment / retail areas / pocket parks. For example, the immediate vicinity of Brockley station has been temporarily pedestrianised to allow local cafes and restaurants to offer socially-distanced outdoor seating. This has been very successful and should be made permanent. Furthermore it should be considered as a role-model for other similar areas **2. Do you have any comments on the proposed key objectives?** • Increase safety for everybody inside and around the Brockley and Ladywell Conservation Areas • Prioritise cyclists, pedestrians and public transport • Reduce pollution • Emphasize the tranquil & residential nature of Brockley • Make the access points to Hilly Fields park safer for pedestrians, cyclists and public transport • Co-ordinate work across the Borough, and across London Boroughs, to reduce the through commuter traffic on residential roads from outer London to inner London. This traffic peaks during the morning and evening rush hours.	1	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies. The Councils approach to LTNs can be found on the Councils website.	No change.

		3. **Do you have any comments on the proposed approaches for the area?** Select topic(s) and comment below LWA2: Connected network of Town centres **4. Please provide your comments on the topic(s) selected above?** We note that other London boroughs have made significant progress in these areas over the last 18 months, successfully rebalancing road use away from cars towards cycling, walking and public transport. Proven templates exist that can easily be applied throughout the Borough as well, in particular in Brockley and Ladywell wards, where the traditional residential road grids (in the conservation areas in particular) were designed to support local means of transport. These residential roads were never designed to support rat-running car traffic, which is always to the detriment of all residents along those routes. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LSA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected 4. **Please provide your comments on the topic(s) selected above**? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Ladywell almost has the feel of a village with an interesting mix of independent shops and a railway station nearby. It could be a beautiful and relaxing centre for people to linger for a rest and a chat were it not for the amount of traffic streaming through and polluting the area with exhaust gases and noise. Closure of the road through Ladywell centre should be considered.	0	Noted. The draft Local Plan recognises the key role of Ladywell in supporting the neighbourhood and local community, and therefore reflects this by re-designating it as a Local Centre within the town centre hierarchy. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies. Road closures are outside the scope of the Local Plan. The suggestion regarding Ladywell Road will be passed along to colleagues in the Council's Transport Service.	No change.

3	LSA	**1. Do you have any comments on the proposed vision?** Stop building and overcrowding the area. Plant more trees instead **2. Do you have any comments on the proposed key objectives?** Keep things as they are all natural. It looks good and there is no need to spend the money. If you have excess budget then plant more trees and save the wildlife **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA1: West Area place principles LWA2: connected network of town centres LWA3: Forest Hill district centre LWA4: West Lewisham Links **4. Please provide your comments on the topic(s) selected above?** Stop building and overcrowding the area. Plant more trees instead **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** 111-115 Endwell Rd 6 Mantle Rd Jenner Health Centre Havelock House Land at Forest Hill Station west Clyde Vale LSIS Featherstone Lodge, Eliot Bank Former Sydenham Police Station Willow Way LSIS Land at Forest Hill Station east Perry Vale LSIS Land at Sydenham Rd and Loxley Close 113-157 Sydenham Rd 154-160 Sydenham Rd 74-78 Sydenham Rd **6. Please provide your comments on the site allocation(s) selected above.** Stop building and overcrowding the area. Plant more trees instead **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Stop building and overcrowding the area. Plant more trees instead	2	Noted. The Local Plan is required by National Planning Policy Framework to set a positive strategy for delivering sustainable development, and within this context, meeting identified needs for new homes, workspace and jobs, and town centre uses along with supporting infrastructure. The London Plan sets a housing target for Lewisham which the Council must seek to address through the preparation of the local plan. The proposition to stop building is not consistent with higher level policy. The Local Plan Part 2 policies on Green Infrastructure set out the framework for protecting and managing the Borough's network of green infrastructure, and include requirements for new development around urban greening, nature conservation and enhancement, tree protection and tree planting.	No change.
3	LSA	1. Do you have any comments on the proposed vision? There are plans for a lot of housing - perhaps too much and at the expense of protecting and improving nature 2. Do you have any comments on the proposed key objectives? It seems from the plans that there are a lot of residential properties being planned for. I would strongly argue for this not to be at the expense of nature and the opportunity to improve the quality of nature in the borough. I have seen far to many developments that are built solely to maximise numbers of residences and these are at the expense of providing the greenspace the borough, city and planet needs. The	2	The London Plan sets a housing target for Lewisham which the Council must seek to address through the preparation of the local plan. The Council recognises that meeting this target is a challenge. However, the Local Plan seeks to positively and proactively manage new development in line with the Good Growth principles set out in the London Plan. This is defined as growth that is socially and economically inclusive and environmentally sustainable.	No change.

		green space needs to be of high quality incorporating native species and providing wellbeing opportunities for the whole of the community. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		The Local Plan Part 2 policies on Green Infrastructure set out the framework for protecting and managing the Borough's network of green infrastructure, and include requirements for new development around urban greening, nature conservation and enhancement, tree protection and tree planting.	
3	LSA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Given the relatively small extent of employment floorspace that exists on site (with most demolished or vacant), the site has real potential for short term regeneration within this part of Sydenham and lead to future investment in the adjoining Kirkdale High Street area. The site allocation and proposed employment floorspace/residential numbers appear achievable - if not capable of increased residential -as the wider site area is some distance from the nearest heritage assets and not subject to any local or strategic views. We have commented on the potential identification of the Sydenham Extension ASLC - and fail to see that the quality of Kirkdale High Street warrants such a conservation' policy - presenting a further constraint on the future regeneration of the Willow Way Locally Significant Industrial Site (LSIS). There does not appear to be	0	Support noted for the site allocation. All sites will be car-free or car-lite in accordance with the London Plan parking standards.	

		any specific commentary or character assessment of this area in the Lewisham Character Study - so would argue that the proposed inclusion is unwarranted. If the site boundary for the ASCC does take in the Kirkdale High Street area and neighbours the Willow Way site - we would seek its removal as a potential ASLC. We note that the Site allocation requires a masterplan to ensure the appropriate co-location of employment and other uses across the site. This allocation requirement appears at odds with the Policy EC5 E - which only appears to require compliance with EC5 F and G? The relevant policy at EC5 requires clarification and needs to tie into the relevant site allocation document - to avoid confusion. In the event that the Council do eventually require a formal masterplan, it is assumed that they will allow the development of early phases that do not conflict with the wider goals and principles of the Site Allocation and Masterplan. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** The Council should actively support an essential user/car free approach towards the regeneration of these PTAL site(s) encouraging developers and users to switch from car use to car clubs and bikes.			
3	LSA	**1. Do you have any comments on the proposed vision?** Broadly support **2. Do you have any comments on the proposed key objectives?** Broadly support **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** LWA1: West Area place principles **6. Please provide your comments on the site allocation(s) selected above.** I broadly support the principles, pareticularly that requiring proposals to respond to and reconnect remnants of the Great North Wood. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** I object to the designation of this remnant of the Great North Wood for development, reducing the green corridor between One Tree Hill and (through the Horniman) Sydenham Woods and damaging an important wildlife habitat. Building on green sites in general, let alone ancient woodland, should be avoided and appear contrary to objectives D8 & D9 of the draft Plan. This green wooded site is adjacent to the most historic buildings in Forest Hill, and contains an Edwardian building which is one of the gate houses of the former Tewkesbury Lodge, all of which contribute to the character of the area.	3	Support for vision and objectives noted. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

3	LSA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** The proposed development of the Havelock House site appears to be at odds with objective 9 to protect and enhance the distinctive woodland character of the area. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** We are very concerned about the proposal to develop the site behind Havelock House given the impact this would have on the trees and wildlife in that space. There is of course very little information at this stage about the nature of such a proposed development or what the exact affected area would be given the visual outline in the Lewisham plan document appears to encompass a significant number of pre-existing residential buildings and gardens (up to approximately half of the outlined area). However, 30 residential units seems a very high number to be contemplating if there is any intention to protect and preserve the woodland character of this area of land and its existing low rise residential properties. Our concerns include: 1. Landscape - the extensive green space is an important element in the wildlife habitat of the area, partial or complete removal of the tree cover and associated vegetation would constitute significant environmental harm. Are there/should there be any tree preservation orders in place to protect any of the trees? 2. Character - the green canopy is also an important element of the character of the area and a significant visual feature at the top of the area's topography. The loss of this mature feature would constitute significant harm to the character of the area. 3. Access - there is no obvious direct access to the site, both frontages are occupied by active uses, both would require removal of trees to allow construction and occupation - in conflict with the strategic objective to retain green cover 4. Servicing - as an undeveloped site the anticipated provision of new utility services would further impact the substantial tree cover and wildlife habitat. 5. Parameters - in the absence of a more specific proposal for the site, the physical parameters constitute an unknown risk, consequently matters of configuration, building height, density and plot coverage will impact access, landscape and character - in the absence of site specific guidance for this sensitive site, allocation should be considered premature. 6. Any development of the site would have significant local impact and should not be determined without fuller community engagement - eg through local residents	4	Noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		associations such as the Tewkesbury Lodge Estate Residents' Association - prior to allocation. Should allocation be granted, we would want to see a community design exercise undertaken to ensure the above and any other community concerns are appropriately recognised and taken into account for any specific design proposals. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** I believe the proposed vision sounds ok but I'm wary about the allocation of public funds for revitalising local businesses and green spaces when there are larger problems in the area that are necessary but not necessarily revenue driving. After many years of dedicated collaboration with councillors on the traffic and safety issues of Drakefell and Gellatly Roads, we fully expected to see some mention of these roads in the detailed plan for the “West Area”. However, Section 8 talks about transforming the South Circular, Brockley Rise and Brockley Road into “healthy streets” but there is not so much as a mention of Drakefell and Gellatly Roads. Perhaps we have misunderstood but it seems pretty clear from this document that our roads have been de-prioritised by Lewisham Council and no-one has taken it upon themselves to let us know. Again and again, Drakefell Road and Gellatly Road are ignored or overlooked by this Council. Many of us have worked hard repeatedly to provide evidence of local support for change and have even proposed ways of achieving this. And yet each time, just as we think we have finally managed to secure the funding required, things go very quiet and we learn, not from our ward councillors but through social media, that we have been pushed aside in favour of somewhere else, despite constant and indeed recent assurances from councillors that Drakefell and Gellatly are a priority for them. Last fall our car was totalled by a drunk driver speeding down Drakefell road who nearly drove into our house. We no longer feel safe living on a road that is a main thoroughfare for the council and never supported for traffic measures to be put in place. **2. Do you have any comments on the proposed key objectives?** There is no mention of improvements to existing traffic flow in neighbourhoods. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** Nothing to do with my neighbourhood **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** Nothing to do with my neighbourhood **7. Are there any other issues and/or approaches for the area that you feel should be considered?**	0	Noted	Local Plan amended to make reference to Drakefell Road/Gellatly Road.

		Action on and around the “Drakefell Gellatly Corridor” where problems around traffic speed, safety, congestion and pollution have been more than evident for some time and reported by members of the community countless times.			
3	LWA	**1. Do you have any comments on the proposed vision?** Vision is good but must be inclusive of all areas. The Ravensbourne Road / A205 area and parade of shops is completely ignored, that is not right. Please don't ignore Ravensbourne Road / A205 area and parade of shops which is a real trouble spot and totally NEGLECTED. **2. Do you have any comments on the proposed key objectives?** Yes! Aim 8: Transform the South Circular (A205) and Brockley Rise / Brockley Road (B218) into ‘healthy streets’ with public realm improvements that make walking, cycling and use of public transport safer and more convenient. Your ambition here MUST extend to the deprived parade of shops of Stansted Road numbers 295-341, not just the corner with Brockley Rise. This parade is shabby, unloved and in serious need to support. There are 3 (THREE!) chicken shops within 300m, how unhealthy is that. Shops are empty and the fronts shabby. We need serious regeneration here with greater choice. The area is ALWAYS FORGOTTEN as it falls close to the border between wards. This is unfair and you are failing a diverse community with older and disabled people living here. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** Regeneration **4. Please provide your comments on the topic(s) selected above?** Please include Ravensbourne Road / A205 area and parade of shops **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** Please don't ignore Ravensbourne Road / A205 area and parade of shops which is a real trouble spot and totally NEGLECTED. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Please don't ignore Ravensbourne Road / A205 area and parade of shops which is a real trouble spot and totally NEGLECTED.	0	A comprehensive review of the borough’s town centres and Local Parades has been carried out and used to inform the Local Plan. The Local Plan has a policy on restricting over concentrations of betting shops and fast food takeaways.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?** Good vision - improving public transport links, revitalising local centres, and above all recognising the importance of maintaining green spaces. **2. Do you have any comments on the proposed key objectives?** On the face of it the objectives appear sound. However, not all proposals appear to meet the objectives. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	5	Support for vision and objectives noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		4. Please provide your comments on the topic(s) selected above? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** The proposal for the development of the land surrounding Havelock House seem to be at odds with the objective (point 9) to "Protect and enhance open and green spaces along with the distinctive woodland character of the area". Furthermore, it will do nothing to assist the council reaching its target to deliver net gains in biodiversity (Green Infrastructure (section 10)) because it will be reducing the area of green space within the Borough. . The Development Plan for the West Area makes important reference to the remnants of the Great North Wood that can still be seen in Forest Hill. The proposed area for development is in the best part of the Great North Wood that we have. The oak trees and natural woodland that are found here must be preserved. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Although a relatively small area, the wild life found is diverse and special as has been mentioned by others in their comments on this site. We have, during this pandemic, especially come to realise how important these green spaces are. It's not just about retaining the space and all that lives there for the sake of the wild life, it is also about our own wellbeing, physically, mentally and spiritually. Filling in every green space is counter productive, it may help to reach a target set today but it will do nothing for the future of our area. These precious spaces can easily be destroyed and once gone, they are gone forever. Their loss will not enhance the neighbourhood, it will instead distract from its very character, something the 'Vision' appears to want to protect and it will add to the burden of traffic and demands on infrastructure. On first reading the 'Vision', I thought that was recognised.			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.**	1	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		I've been customer od Dartmouth Service Garage for many years. Closing this place will have negative impact on local society as there isn't many garages in the area, especially ones that provide solid and reliable service. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** Many of the proposed sites need revitalisation and are ideal for building affordable homes and workspaces apart from a few sites in the West Area, where green and wooded spaces would be reduced. **2. Do you have any comments on the proposed key objectives?** The main objectives in the West Area Summary are realistic and take account of how the main centres within the Area could complement each other. I particularly applaud Objective 9: “Protect and enhance open and green spaces, along with the distinctive woodland character of the area. Deliver a connected network of high quality walking and cycle routes that link these spaces.” and would expect any developments to be consistent with this. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA1: West Area place principles LWA2: Connected network of town centres LWA4: West Lewisham Links **4. Please provide your comments on the topic(s) selected above?** LWA1: West Area place principles There is scope for intensification in terms of employment and dwelling opportunities for some of the sites identified, but this should be not be at the cost of over-development in terms of the density of building and the erosion of green or wooded spaces. LWA2: Connected network of town centres Historical character is important in preserving much needed local distinctive qualities within a large metropolis. In the case of Forest Hill and its surrounds, the green spaces and wooded areas are distinctive features that would need to be preserved. In terms of public realm, social, cultural, spatial and physical characteristics are highly intertwined and the above amenities are an important contribution to how Forest Hill is experienced. LWA4: West Lewisham Links More cycle tracks would be a welcome feature and needed to complement the cycle parking mentioned. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Featherstone Lodge, Eliot Bank Havelock House **6. Please provide your comments on the site allocation(s) selected above.**	4	Support for objectives noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies. The Featherstone Lodge site allocation has a previous planning consent (reference DC/14/086666) although this has lapsed. The site allocation reflects the land use principles and site capacity established through the lapsed consent, also recognising that site specific matters have been addressed through the design-led approach and planning approval process. It is therefore considered appropriate to allocate this site to help address the Borough’s identified housing need.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		Proposals for the majority the sites identified are welcome and would greatly improve the functionality and attractiveness of some areas that have become run down and not used to their potential. However, there are particular concerns regarding the proposals for two sites: Havelock House and Featherstone Lodge, Eliot Bank. In the case of Havelock House (which includes the Telecom site and Willow Tree House near Horniman Drive), development of 30 housing units within the backland portion would significantly erode what is currently a green and wooded area which, as a remnant of the Great North Wood, is also of historic significance. The proposal for this site is inconsistent with the principles stated in the proposed vision: the above remnants need be retained - not destroyed. There is also the need to maintain biodiversity and wildlife and the reduction of habitat and the wildlife corridor implicated in the proposal for this site would compromise this. Similar issues would arise from the provision of new buildings and the proposed development of 33 housing units for the Featherstone Lodge site. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** Revitalisation in terms of affordable homes and workspaces is welcome provided it is sensitive to the environment and does not at cost to the amenities that encourage local living – in particular green and wooded spaces. **2. Do you have any comments on the proposed key objectives?** The main objectives in the West Area Summary are realistic and take account of how the main centres within the Area could complement each other. I particularly applaud Objective 9: (“Protect and enhance open and green spaces, along with the distinctive woodland character of the area. Deliver a connected network of high quality walking and cycle routes that link these spaces.”) and would expect any developments to be consistent with this. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA1: West Area place principles LWA2: Connected network of town centres LWA3: Forest Hill district centre LWA4: West Lewisham Links **4. Please provide your comments on the topic(s) selected above?** LWA1: There is scope for intensification in terms of employment and dwelling opportunities for some of the sites identified, but this should be not be at the cost of over-development in terms of the density of building and the erosion of green or wooded spaces. LWA2 + LWA3: Historical character is important in preserving much needed local distinctive qualities within a large metropolis. In the case of Forest Hill and its surrounds, the green spaces and wooded areas are distinctive features that would need to be preserved. In terms of public realm, social, cultural, spatial and physical	5	Support for vision and objectives noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies. The Featherstone Lodge site allocation has a previous planning consent (reference DC/14/086666) although this has lapsed. The site allocation reflects the land use principles and site capacity established through the lapsed consent, also recognising that site specific matters have been addressed through the design-led approach and planning approval process. It is therefore considered appropriate to allocate this site to help address the Borough’s identified housing need.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		characteristics are highly intertwined and the above amenities are an important contribution to how Forest Hill is experienced. LWA4: More cycle tracks would be a welcome feature and needed to complement the cycle parking mentioned. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House Featherstone Lodge, Eliot Bank **6. Please provide your comments on the site allocation(s) selected above.** Proposals for the majority the sites identified are welcome and would greatly improve the functionality and attractiveness of some areas that have become run down and not used to their potential. However, there are particular concerns regarding the proposals for two sites: Havelock House and Featherstone Lodge, Eliot Bank. In the case of Havelock House (which includes the Telecom site and Willow Tree House near Horniman Drive), development of 30 housing units within the backland portion would significantly erode what is currently a green and wooded area which, as a remnant of the Great North Wood, is also of historic significance. The proposal for this site is inconsistent with the principles stated in the overall proposed vision: the above remnants need be retained - not destroyed. There is also the need to maintain biodiversity and wildlife and the reduction of habitat and the wildlife corridor implicated in the proposal for this site would compromise this. Similar issues would arise from the provision of new buildings and the proposed development of 33 housing units for the Featherstone Lodge site. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** MORE FOCUS ON CYCLING! - make it MUCH easier - cycle only major roads and routes that are direct, uninterrupted and segregated from cars/vehicles. - reduce / ban parking (apart from loading/disabled parking) on all high streets and main roads and put in segregated cycle routes instead. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected	3	The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The Local Plan supports and seeks to promote cycling through the Healthy Streets Approach (see the Part 2 Transport policies for further details). The specific nature of cycleways and cycle provision will be considered on a case-by-case basis, however this may include segregated lanes.	No change.

		6. Please provide your comments on the site allocation(s) selected above. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** We have carefully considered the proposal and we think that it is contrary to many of the principles that are set out in the Council's Development Plan. 1. Within the Green Infrastructure (Section 10) section of the plan is the statement that "The Council will seek to deliver net gains in biodiversity (and support the London Plan to be 50% green by 2050". The proposed development of The Telecom Site will reduce the area of green space within the Borough by more than any other development plan being considered for Lewisham West and possibly by more than any other area of Lewisham as well. 2. Similar points are made in GR3 (page 355) "development proposals need to maximise opportunities to retain these trees and avoid compromising and encroaching on available space for trees," 3. More specifically for the West Area, Point 9 of the objectives is to "Protect and enhance open and green spaces along with the distinctive woodland character of the area" This of course is reflected in place names - most notably Forest Hill. The proposed development is slap bang in the middle of the Forest on our Hill! 4. The Development Plan for the West Area makes welcome reference to the remnants of the Great North Wood that can still be seen in Forest Hill (see paras 18.2, 18.8, 18.9, 18.13). These remnants form a wildlife corridor between Sydenham Woods and One Tree Hill, both of which are recognised as Nature Reserves in the London Borough of Southwark. The proposed development site is in the best part of the Great North Wood that we have in Forest Hill and for that matter in Lewisham. The Council should make sure that it retains not only all the Oak trees on the skyline but also the other areas of natural woodland that lie between The Telecom Mast, Willow Tree House and Havelock House.	5	Noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		7. Are there any other issues and/or approaches for the area that you feel should be considered? 6. The Oak trees on the development site are part of a wildlife corridor which traces the course of the Great North Wood from Sydenham Woods to Horniman Triangle, to Horniman Gardens, to the development site, to One Tree hill. Woodland birds migrate along this corridor. In Spring there are Chiffchaff, Willow Warblers and Blackcap (regularly), Buzzard (occasionally) and Firecrest (rarely). In late Summer there are Chiffchaff, Willow Warblers and Garden Warblers (regularly) and Pied Flycatchers (rarely), and in Winter there are Redwing (regularly)and Brambling, Siskin and Redpoll (rarely) 7. Downland grasses, plants and invertebrates have been found on the nearby Honor Oak Road Reservoir Site, and a similar survey of the grassy slopes of the proposed development site would be prudent. 8. We recommend that additional native trees be planted on the proposed development site. Street Trees for Living is already fundraising for Oak trees on the Horniman Triangle. We as a Residents' Association have worked with Street Trees for Living to fund raise for 50 trees on the streets around the proposed development site. We would be happy to volunteer to raise funds for Oak trees on the development site. Such planting would support the Council in its Plan. "The Council will seek to deliver net gains in biodiversity (and support the London Plan to be 50% green by 2050)".			
3	LWA	**1. Do you have any comments on the proposed vision?** The vision refers to the woodland character yet one of these proposals would directly and significantly affect the remaining woodland and green area between the Telecom site at Horniman Drive and Havelock House in Honor Oak Road. 2. **Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** The area referred to as Havelock House in the document is a cause for concern for several reasons. The proposal to build up to 30 housing units in this place is deeply disturbing. The green area between Havelock House and the Telecom site in Horniman Drive contains 15 mature oaks which are a remnant of the Great North Wood.The Great North Wood has been reduced over the years and this remnant must be retained not just for historical reasons but also because we need the trees . They provide an	6	Noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		important function. They absorb carbon dioxide. They are good for our mental health too. There are also other trees in this place which also play an important part in creating the identity of this green area. The area is very significant because it supports wildlife. Any development here would threaten the trees and wildlife even if the trees are preserved. The council favours biodiversity and this proposed development would result in a significant loss of biodiversity. The area attracts people who visit the area and others who would like to live here. The area has magnificent views .These views should be protected rather than spoiled. This green space must be protected and preserved and this proposal would certainly result in the loss of important green space and the loss of health benefits such as the air quality. Fairlawn Primary school and Horniman school are both very popular and oversubscribed. The increased population would lead to more pressure on the schools and other services. The roads within this area have experienced problems with the number of cars racing through. The council has been informed of these problems but very little attention has been given to it to address it. We cannot afford to have even more road traffic as a result of his development. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** A good vision, but developing the site behind Havelock House would ruin it. **2. Do you have any comments on the proposed key objectives?** See below **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** See above **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** We have lived in this area for 40 years, and over that time have seen the degradation of the natural habitat: we used to have Hedgehogs at the bottom of our garden in Forest Hill, and a Tawny Owl would hoot from an old tree stump: these have disappeared. The area is ancient Downland, as witness Downland plants like Bird's Foot Trefoil and Yarrow that grow on the triangle at Rocombe Crescent.	9	Support for vision noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		Woodland flowers such as Dog Violet, Wood Avens and Lesser Celandine grow on the development site and adjacent gardens. Ancient Oaks form a Wildlife Corridor running from Sydenham Woods to Horniman Triangle, to Horniman Gardens, through the Telecom Mast site behind Havelock House, through back gardens, which contain many Oaks, to One Tree Hill, which is in Southwark. And enthusiastic local groups are planting even more Oaks on the Horniman Triangle, with ambitions to plant Hornbeam as well, to diversify and add to the existing trees and so replace some of the woodland that has been lost over time. The Telecom Mast site contains many Oaks and other trees that are an essential link in this this chain. Peregrine Falcons have been spotted on the Mast, from where they were clearly hunting the small birds which allowed them to rear a family last year. They, and many invertebrates and small mammals have thrived not just because of the mature Oak trees, but because of a whole ecosystem of scrub and other trees and bushes that make up this ecosystem. In addition, Red Kite, the occasional Buzzard, and even Hobby have been spotted from the hill. And many woodland birds, such as Nuthatch, Long Tailed, Coal and Blue Tits, Greater Spotted Woodpecker, Green Woodpecker, Greenfinch, Goldfinches, Goldcrest and even Firecrest can be seen in back gardens. Developing the site behind Havelock House would damage this ecosystem If we are to preserve this irreplaceable chain of wildlife we should be thinking, not of building on the site, but actually adding to the trees on it, in order to preserve it for posterity. This would contribute to an important goal in Lewisham's Development Plan which is "to deliver net gains in biodiversity (and support the London Plan to be 50% green by 2050)" **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N//A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** As a local resident, I am concerned about the Havelock House site. The plan itself notes the importance of the area's "green spaces, ... long views and woodland character". The site has a significant number of trees, which are part of the wildlife	7	Noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies. Local issues regarding congestion and 'rat runs' will be passed along to colleagues in the Transport service.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		corridor between One Tree Hill and Horniman Gardens. The green space on the site is valuable as wildlife habitat. Also further development might well impede current striking views. In addition, traffic in the surrounding streets already gets heavily congested. During peak times local residential streets are used as a "rat run" and become very clogged. This creates pollution and is sometimes also dangerous. I think the current roads could struggle to cope with more traffic. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** 30 units could be too dense for the area available, particularly if the older trees are to be saved. A compromise would be to find a balance between green and housing **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	7	Noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected	0	Noted. The Low Traffic Neighbourhood scheme is outside the scope of the Local Plan. However the plan does include new policies which aim to improve support liveable neighbourhoods and placemaking through public realm enhancements, particularly in terms of supporting and encouraging walking and cycling and reducing car dominance. This includes Part 2 policies on Public Realm and Healthy Streets.	No change.

		6. Please provide your comments on the site allocation(s) selected above. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Placeshaping - I've recently moved to the area (SE23/SE4 border) and one of the most successful bits of placeshaping that I've had the pleasure to come across are the LTN and assorted seating area by Eddystone Road bridge - it's truly fantastic! It's used all the time, even in the depths of winter and really is a hidden gem of a spot that seems really loved by the community. I've also seen the free bike-fixing service there a few times which is a great spot given it's such a well used route from Peckham into west Lewisham Borough. I know there are a lot of other bridges that intersect the Overground mainline, I think similar Public Realm interventions could be enacted at most of the other spots. It would also very much support the "Places to Dwell" ambition of the plan.			
3	LWA	**1. Do you have any comments on the proposed vision?** We welcome the proposed vision, in particular improving public transport links, revitalising the local centres and most of all focusing on improving environmental concerns and maintaining green spaces. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** Very supportive of improving walking and cycling access and safety around the intersection by Forest Hill Station, as well as anything that can be done to address pollution - this is presently an unpleasant area that feels dangerous as a pedestrian or cyclist **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** We would have strong reservations over any development of this site. - This area - including, but not limited to the mature oak trees - is an important part of a local wildlife corridor, and building over this site is likely to have a significant detrimental effect to local wildlife habitat. - The proposal appears contrary to the stated objective to "Protect and enhance open and green spaces, along with the distinctive woodland character of the area". - I am particularly concerned over any additional pressure on traffic on Honor Oak Road - it is already extremely dangerous walking along this road during the school run to Fairlawn School - as I go into detail below.	8	Support for vision and improving walking and cycling is noted. With regard to the suggested road improvements we will pass your comments on to the Transport team. All development within Forest Hill will be car-free or car-lite in accordance with the London Plan parking standards.	No change.

		- vehicular access to site - it is unclear what the proposal is but I am concerned this would also push more vehicle traffic onto the residential roads around the site. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** As mentioned above, I find the approach to Fairlawn School along Honor Oak road to the west of the school extremely dangerous for pedestrians, especially children, and would like to see some improvements to this incorporated into the local plan. This appears in scope for the vision and objectives of the plan. The pavement between the Canonbie road junction with Honor Oak Road, and the school, is extremely narrow, and at least once a week significantly narrowed even further by bins being put out; I regularly find myself forced onto the road walking to and from school, even before we were required to follow pandemic related social distancing. Furthermore there have been more than one occasion where inconsiderate roadworks contractors have further narrowed the pavement by placing roadworks signs on the pavement, typically reducing the pavement width to less than a half. Northbound motor traffic also regularly turns from Honor Oak Road into Canonbie Road without due care and often cutting across the corner of the pavement - again this is extremely dangerous during the school run when families are trying to cross the road. I would love to see some proposals for remedying this and making the pedestrian access to Fairlawn a safer and less stressful daily experience			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** The proposed redevelopment of Willow Way LSIS is wholly unacceptable. This are is currently sympathetic to the area with a mix of industrial units. In particular, Dartmouth Service Station is an essential and integral part of the Sydenham/Forest Hill community. This established local business is irreplaceable as a part of, and indeed at at the heart of, the local area - providing unsurpassed service, value and integrity in dealing with their customers. This area does not need any additional new retail units and the proposed residential development in the Willow Way LSIS is a monstrous eyesore that will destroy the ambience of this historic part of Sydenham.	0	Noted. The draft Local Plan proposals for Willow Way LSIS aim to provide for a comprehensive and employment-led mixed-use redevelopment. It is considered that a more optimal use of land could be made on vacant land and some underused parts of the site. The policy sets out a clear no net loss of industrial floorspace principle, with the expectation an intensification of business uses can be delivered. It is also considered that the revitalisation of the LSIS can support the vitality and viability of the Upper Kirkdale centre, including through new public realm and townscape improvements. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house

		7. Are there any other issues and/or approaches for the area that you feel should be considered? Yes - find an alternative location and leave well alone.			
3	LWA	**1. Do you have any comments on the proposed vision?** I think that the vision for Lewisham West is exactly right, but you are not following it in some cases - see below. **2. Do you have any comments on the proposed key objectives?** I agree with the spatial objectives for Lewisham West. However, I think that the objective of creating a "healthy street" along the South Circular Road is unrealistic. The council has no responsibility for the South Circular, and TfL, which is responsible, can do little. A team from TfL looked at tree planting opportunities along the South Circular Road in Forest Hill and found hardly any sites where trees could be planted. There were too many "subsidence hot spots" and too many underground services. As long as traffic pollution continues to increase, the South Circular Road is likely to remain an unhealthy environment. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA1: West Area Place principles **4. Please provide your comments on the topic(s) selected above?** The principle that green spaces should be protected, integrated and connected is correct, but the development proposals for the Havelock House site, if accepted, would have the opposite effect (see below). **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** This is the greenest site that is mentioned in the Development Plan for Lewisham West, and possibly in the whole of Lewisham. 1) It includes at least 10 mature Oak trees, as well as many other native trees, a hedge and areas of grass. 2) It supports a large population of small birds which fed the 2 Peregrine Falcons which hunted from the Telecom mast last year and early this year. 3) It is part of the wildlife corridor of Oak trees in fragments of the Great North Wood from Norwood, to Crystal Palace, to Dulwich Woods, to Sydenham Woods, to Horniman Gardens, to the Telecom mast, through back gardens in Liphook Crescent and Ringmore Rise to One Tree Hill. 4) This is the longest wildlife corridor that runs through Lewisham, and is the only one that is threatened by the Development Plan. 5) The corridor is deteriorating as the result of recent development, and the Tawny Owls and Hedgehogs which were seen in the Forest Hill part of this corridor 30 years ago have now retreated to Sydenham Woods.	9	Support for vision noted. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies. Whilst recognising that the South Circular is a TfL road, the Council considers there are opportunities to enhance the qualities of it by applying the Healthy Streets approach. The Council will continue to work with the London Mayor, TfL and other stakeholders to improve the quality of the environment along the road especially for travel by walking, cycling and public transport. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		6) Despite this deterioration, the Forest Hill part of this corridor has this year seen 50 Redwing from Scandinavia, one Chiffchaff and one Blackcap from Africa, and one Red Kite on local migration. It is not sufficient to protect the Oak trees alone. In order to regenerate itself, the wood needs woodland clearings and areas of scrub where saplings can grow and birds can nest. No one doubts that Lewisham needs more housing, but on this site - surely the greenest in the Development Plan - the case for conservation is stronger than the case for development. As local residents we have funded the planting of 25 street trees that support this corridor, and connect the Telecom mast site both to One Tree Hill and also to Horniman Gardens. We have also planted another 25 trees in surrounding streets. As far as this site is concerned, local residents are following the Development Plan by connecting up fragments of the former Great North Wood. By asking for development proposals on the Telecom Mast site the Council appears to be going against the Development Plan and weakening a link in the wildlife corridor. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** No			
3	LWA	**1. Do you have any comments on the proposed vision?** I wholly agree with making Sydenham more 'healthy' and attractive centre to live in. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected 4. **Please provide your comments on the topic(s) selected above**? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I don't agree with closing down businesses i.e the garage, which has been a trustworthy business serving this community for many years to build apartment blocks. I understand it is a compulsory purchase which is very rude and unfair. Where are they supposed to go? What about all us residents who use them? At least with the garage there, is is open air and you're not walking past an oppressive high rise (and exactly how 'high rise' is proposed - they should be banned! What about all the apartments next to Sainsburys at the roundabout, have they all been filled, there are so many going up, does the garage really need to be closed down? They're a busy business and should remain part of the community. **7. Are there any other issues and/or approaches for the area that you feel should be considered?**	0	Support for vision noted. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. The draft Local Plan does not include any details or proposals around the compulsory purchase of specific land or sites.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		Lots of bike lanes, more greenery			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** It is outrageous that Lewisham Council is considering expropriating the Dartmouth Service Station. They provide an essential service, local jobs and great service to the community. How can killing honest and useful businesses "benefit" the local community? And what about the Bricklayers? This historic pub will be dwarfed by high rise buildings! Who could, in their right mind, think that it is a good idea? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Do not kill businesses and destroy local jobs!	0	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. Noted. The Council recognises the important role that public houses play in the local economy and its Lewisham's distinctiveness. Therefore, the draft Local Plan Policy EC7 (Public houses) sets out a new 'presumption in the favour of the retention of public houses'. This will help to ensure that any future proposals for redevelopment of land within the Willow Way LSIS site fully consider the pub and its amenity through the masterplan and design-led process. However it is acknowledged that the site allocation policy could be amended to provide more clarity on the need to protect the public house and its amenity.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. Willow Way LSIS site allocation amended to include new development guidelines around protecting the character and amenity of the pub.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** As stated in no. 9, 'It is important to protect and enhance green spaces along with the distinctive woodland character.' This is why I disagree with the proposed 30 new units. The proposed development contradicts the objective. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.**	9	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site. The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		This site retains remnants of the Great North Wood. This is part of the distinctive woodland character of the area. It is a wonderful natural space and it is vital to protect the mature oaks, trees, shrubs and diverse animal life which lives there. (There have even been peregrine falcons nesting.) These plans seem to have been drawn up without really taking into account how special the area is. I appreciate that building additional homes is important but I really do believe that retaining this small area of biodiversity is essential. We need to protect it for future generations If the units are built, there will be more traffic. Honor Oak Road is already often at a standstill and the pupils at Horniman and Fairlawn Schools, as well as local residents, will be be affected by pollution, noise etc. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** If Honor Oak Road is even more congested, people will start to drive on the residential roads, looking for an alternative route. Local amenities will also be further stretched.			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Please, please don't make the Dartmouth rd. garage have to leave! It is a wonderful local business that is so used by so many people in the community. They provide a much needed service and always help out local people when they are in need. I am sure rejuvenating the area will be great but please not at the expense of this much used business. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** The vision to reinforce the historic fabric, landscape and woodland character of Forest Hill is good on paper but why then select for development from the outset Havelock House, a green site with ecological and historic significance (it contains Lewisham's most important remnants of the Great North Wood)? **2. Do you have any comments on the proposed key objectives?**	9	Noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		The key objective 9 to protect and enhance our green spaces, along with the distinctive woodland character of the area, is vital and particularly important for Forest Hill which retains remnants of the Great North Wood and is included in a line of trees form an important wildlife corridor from Sydenham Woods to One Tree Hill. Developments must not be allowed to destroy this key ecological feature which is so important for wildlife, air quality and well-being. The proposed development at the green, wooded Havelock House site undermines this objective completely and should be withdrawn. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** The Havelock House Site should be removed from the Development Plan. The proposal to construct 30 units on this green site contradicts the Council's vision and objectives to protect and reinforce our distinctive green spaces. This site contains mature oaks and other trees, shrubs and grassland and is an important habitat for many birds and other wildlife which must be protected. Any development on this site will destroy the natural habitat and, even if some mature trees are retained, the loss of green space will be significant. The Plan states that developments should not compromise and encroach upon available space for trees, and that the Council will protect wildlife habitats aiming to maintain and improve special biodiversity so net gains are made. Development on this site will do the complete opposite. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Forest Hill can be an important contributor to supporting the Council in achieving the London Plan's objective to be 50% green by 2050 but only if the development and planning policies truly protect and enhance our existing green sites and trees.		on this predominantly backland site, the proposal will be considered against other Local Plan policies.	
3	LWA	**1. Do you have any comments on the proposed vision?** The vision is flawed due to the policy of promoting urban growth and development with increasing emission of pollution and greenhouse gases over the more important one of maintaining open space to reduce pressure on the environment and economic resources. On the reservoir site on Forest Hill commercial development should be kept to the minimum possible density and on the radio aerial site priority should be given to retention of the mature trees and other natural growth to the benefit of the environment and wildlife. **2. Do you have any comments on the proposed key objectives?** As above **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below**	6	Noted. The Local Plan sets out a positive strategy for managing future growth and development across the borough, having regard to the Good Growth policies set out in the London Plan and the principles of sustainable development set out in Government's National Planning Policy Framework. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		LWA3: Forest Hill district centre **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/a		on this predominantly backland site, the proposal will be considered against other Local Plan policies.	
3	LWA	**1. Do you have any comments on the proposed vision?** The vision to reinforce the historic fabric, landscape and woodland character of Forest Hill while retaining the village qualities (low rise residential areas with green spaces) and views is welcomed. There is not much about Clean Air and improving air quality for the Area - Honor Oak Road is stand still during rush hour and with Fairlawn School, pollution levels should be taken into consideration with more residential buildings . Site allocation of the Havelock House plot for development of 30 units which, as it will take away green space, create more pollution with cars - extra deliveries - already congested with huge increase in vans - has any one done a study in the increase? **2. Do you have any comments on the proposed key objectives?** Objective 4 to establish a Cultural Quarter for Forest Hill is an excellent idea. Objective 8 to establish Healthy Streets is essential and should be a priority for safe walking and cycling routes - be clean with reduced pollution which is a real problem for our Area and must be tackled by the Council for the future health of residents, particularly children. Obejctive 9 to protect and enhance our green spaces with the distinctive woodland character of the area is so important for so many reasons; well-being; air quality; biodiversity; wildlife corridors etc. As this is a key objective, it seems totally wrong to have then allocated the Havelock House site (a small remnant of the Great North Wood with significant old oaks and an important wildlife corridor) for development. The plan contradicts the objectives of the plan - people living and children should take priority in terms of safety and health. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below**	9	Support for vision and objectives noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies. A site screening process has been carried out as part of the land availability assessment which has informed the Local Plan, and the site allocations. Further information is set out in the Site Allocations Background Paper, which forms part of the local plan evidence base. The draft Local Plan has been subject to an Integrated Impact Assessment which includes consideration of Sustainability Appraisal and Strategic Environmental Assessment.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		Havelock House **6. Please provide your comments on the site allocation(s) selected above.** The proposed development of 30 residential units is on a green site which is important for biodiversity and forms part of a significant wildlife corridor (with Peregrine Falcon nesting) - there are mature oaks, other trees and shrubs and grassland all of which would either be destroyed by the development or severely compromised. This is one of the last remaining areas of the Great North Wood in Lewisham which should be preserved and enhanced rather than damaged and reduced. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** National Park City objective which the Council supports but this is contrary to some of the objectives within the planning. The National Park City objective must be followed through in local site selection and planning decisions - and a full impact assessment published.			
3	LWA	**1. Do you have any comments on the proposed vision?** The vision to reinforce the historic fabric, landscape and woodland character of Forest Hill while retaining the village qualities (low rise residential areas with green spaces) and views is welcomed. There should be much more in the vision about Clean Air and improving air quality for the Area. Recognition of the West Area's character of green spaces and the remnants of the Great North Wood is also fantastic. However, this does not seem to be followed through with the site allocation of the Havelock House plot for development of 30 units which, as it will take away green space, runs contrary to this vision. **2. Do you have any comments on the proposed key objectives?** Objective 2 to secure the viability of the the network of town and local centres is fantastic. Objective 4 to establish a Cultural Quarter for Forest Hill is an excellent idea. Objective 8 to establish Healthy Streets is essential and should be a real priority to deliver safe walking and cycling routes which should not only be safer and more convenient but also clean with reduced pollution which is a real problem for our Area and must be tackled by the Council for the future health of residents, particularly children. Obejctive 9 to protect and enhance our green spaces with the distinctive woodland character of the area is so important for so many reasons; well-being; air quality; biodiversity; wildlife corridors etc. As this is a key objective, it seems totally wrong to have then allocated the Havelock House site (a small remnant of the Great North Wood with significant old oaks and an important wildlife corridor) for development. How can we have any faith in these objectives when this is the case? **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA3: Forest Hill district centre LWA4: West Lewisham Links **4. Please provide your comments on the topic(s) selected above?**	7	Support for vision and objectives noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies. The Local Plan Part 2 policies on Green Infrastructure set out approaches and priorities for urban greening, including tree planting. The Council will continue to work with stakeholders to investigate opportunities for tree planting around schools, however the specific details of which are not included in this strategic document. A site screening process has been carried out as part of the land availability assessment which has informed the Local Plan, and the site allocations. Further information is set out in the Site Allocations Background Paper, which forms part of the local plan evidence base. The draft Local Plan has been subject to an Integrated Impact Assessment which includes consideration of Sustainability Appraisal and Strategic Environmental Assessment.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		Forest Hill Centre - the vision to establish the centre as a key hub with employment opportunities and with enhanced place quality is essential and long over due. Pedestrians and cyclists need to be a priority in designing the enhancements. New cycle ways and footpaths are welcomed Tree planting schemes and other green infrastructure schemes should be a priority, particularly for those areas where there is traffic pollution - more green screens to protect children at school and play. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** As set out above the allocation of Havelock House site for the development of 30 residential units is CONTRARY to the vision to reinforce the woodland character of the area and the objective to protect and enhance green spaces. The proposed development is on a green site which is important for biodiversity and forms part of a significant wildlife corridor - there are mature oaks, other trees and shrubs and grassland all of which would either be destroyed by the development or severely compromised. This is one of the last remaining areas of the Great North Wood in Lewisham which should be preserved and enhanced rather than damaged and reduced **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Green spaces and biodiversity are going to be key for the future health of our city and should not be sacrificed for short term goals. Green spaces should only be developed as a last resort and efforts should be made to increase green space. This is part of the National Park City objective which the Council supports but this must be followed through in local site selection and planning decisions.			
3	LWA	**1. Do you have any comments on the proposed vision?** Gross overestimation of the permanent jobs all the proposals will produce, whilst removing existing and much needed industrial / retail sites which provide potential for small business regeneration , local employment opportunities. whilst increasing over densification of housing where will these people work? not all will be screen people or be able to work locally due to lack of retail/ light industrial zones remaining so travelling will increase local traffic pollution etc.. **2. Do you have any comments on the proposed key objectives?** Challenge central Government on targets , and if they are all local... its too much. Too many people. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA3: Forest Hill district centre **4. Please provide your comments on the topic(s) selected above?** Too much crammed in around the railway. Sites by the tracks needed for electric car points. Very few residents will have a place to recharge an electric car on their street and making it difficult wont stop people wanting a car or bike and needing somewhere for them to be mended	0	The Local Plan sets out a positive strategy for managing future growth and development across the borough, having regard to the Good Growth policies set out in the London Plan and the principles of sustainable development set out in Government's National Planning Policy Framework. Like all London Boroughs Lewisham is trying to tackle a housing crises and are directed by the London Plan to plan positively to meet its housing targets of 1,667 homes per annum. The Local Plan also sets out indicative capacities for site allocations which achieve 40,000m2 of net employment floor space and 40,000 m2 of net Town Centre uses.	No change.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below Featherstone Lodge, Eliot Bank 113-157 Sydenham Rd 154-160 Sydenham Rd 74-78 Sydenham Rd **6. Please provide your comments on the site allocation(s) selected above.** The garden should be left as such. more degrading of the Ridge .along with Wells Park Road, Maids House proposals, Castlebar future, the plans for several large remaining houses along Sydenham Hill. Not enough mixed use..just monotonous flats with retail units beneath destroying historic fabric, car parking, mixed use landuse **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Local businesses can include workshops, garages , electric charging areas, local food hubs for things like Just Eat, not zoned away in another area. Destroying local fabric in all areas of Lewisham is not what locals want ..all these new homes are for potential incomers to the borough.			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS 6. **Please provide your comments on the site allocation(s) selected above**. This is a working business and a valued community garage. To plan to purchase and develop the site without consulting the owners is a shocking action **7. Are there any other issues and/or approaches for the area that you feel should be considered?** There are plenty of shops available locally - I don't think we need more. While more flats might be needed, they shouldn't be at the expense of valued local businesses.	0	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. . The draft Local Plan does not include any details or proposals around the compulsory purchase of specific land or sites.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?**		Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan

		N/a **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** We are desperate for more council homes and not 'genuinely affordable homes'. Moreover I have no faith in the wording as time and again developers cite unviable business case to reduce the number of affordable homes to circumvent your 'Vision'. So please understand it is reasonable to think this is not going to happen as original set out in the vision. We have enough private developers who are in it for the profit and seldom with the community in mind. Its nice to build affordable homes, but much better for the community to build council homes that addresses the acute shortage of council homes caused by decades of selling council houses and mismanagement of UK housing by the current and previous governments. What will happen to MOT garage? The neighbourhood has lost the MOT centre on Clyde Terrace by the railway line. Cars will still need an MOT even after electrification of cars and this is a local and much more convenient MOT centre than the one along the busy south circular road in Forest Hill. 7. **Are there any other issues and/or approaches for the area that you feel should be considered**? In the vision there is no mention of building more council homes, improving air quality and more green spaces. I saw one proposal with a high rise flat dwarfing the Brick Layers pub. This striking mismatch of architecture strikes me as unsympathetic to the local low rise neighbourhood. The vision mentions cycle routes. Will these be separated cycle lanes. Studies have shown that more people would cycle if cycle lanes were separated from other road users, especially women and families who would welcome this safer option.		provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. The draft Local Plan policy HO3 (Genuinely affordable housing) sets out proposals for any new affordable housing be affordable to be linked to local income levels. Accordingly, for Lewisham, genuinely affordable housing means housing at social rent levels or GLA's London Affordable Rent level and below, aiming for target rents. This would include Council housing. The Local Plan strategic objectives and policies address genuinely affordable housing, improving air quality and protecting/enhancing green and open spaces. The borough-wide vision and objectives set out in Parts 1 and 2 of the Local Plan will need to be considered alongside the area-based policies included in Part 3. The Local Plan supports and seeks to promote cycling through the Healthy Streets Approach (see the Part 2 Transport policies for further details). The specific nature of cycleways and cycle provision will be considered on a case-by-case basis, however this may include segregated lanes.	process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** Long-term viability and vitality of these community centres depends on good cycling and walking infrastucture, and as a cyclist, runner and regular walker I am supportive of this approach, and of protecting and enhancing green spaces. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below**	0	Support for vision noted. The indicative site development capacity for the site allocation at 111-115 Endwell Road has been set using a standard methodology, as set out in the Site Allocations Background Paper. The optimal capacity of the site will be established at through the planning application process, and informed by the designed-led approach.	No change.

		None selected **4. Please provide your comments on the topic(s) selected above?** Brockley Rise becoming pedestrianised is a good idea **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** 111-115 Endwell Rd **6. Please provide your comments on the site allocation(s) selected above.** A building of 65 residential units is out of scale with the local architecture and presents a challenge for local resources e.g. schools, transport. Proper consideration needs to be given to the public realm to support a place-based community. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** 203-213 Dartmouth Rd **6. Please provide your comments on the site allocation(s) selected above.** Dartmouth Service Station is a business that is at the very heart of the community that I have used for many years. Building on it would rob us of the best independent garage in south london. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Just leave that site alone.	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		4. Please provide your comments on the topic(s) selected above? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I fail to understand how compulsory purchase of the land around the council depot to built flats will benefit locals. We have great facilities with both a nursery and a garage providing necessary services which are in constant demand. The closure of the garage with no other local alternative will mean the permanent closure of the business and loss of jobs. I have no problem with new housing but cannot see why people have to be put out of business. Your document states: "Development must not result in a net loss of industrial capacity" but takes no account of the type of businesses and their involvement in the local community. From the look of the visuals the main thrust of the development is to provide housing but your document seems to stress improvements to the public realm, which seems rather disingenuous. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		The site allocation is not considered to preclude the retention or re-provision of space or units to accommodate existing businesses within the site boundary. The draft Local Plan does not include any details or proposals around the compulsory purchase of specific land or sites.	
3	LWA	**1. Do you have any comments on the proposed vision?** There is no need for more flats especially if it is taking away the livlihood of families ie dartmouth garage. I have been using this garage for 30 years, it is a family run business and needs to stay and support the local community rather than have to go to places like Halfords **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** This shoud perhaps be tidied up but the garage must stay. There is not enough family run places anymore and this site has been used for this for 30 years or more. This supports the local community and must be kept. **7. Are there any other issues and/or approaches for the area that you feel should be considered?**	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Developing high rise housing here which would close down important business, such as the Dartmouth Service Station, would be a real shame. They are a brilliant business and one which is a very important part of the local community. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS 6. **Please provide your comments on the site allocation(s) selected above**. Any plans to develop or change the area should not impact the Bricklayer's Arms, which is a decent community pub and an asset to the area. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	Noted. The Council recognises the important role that public houses play in the local economy and Lewisham's distinctiveness. Therefore, the draft Local Plan Policy EC7 (Public houses) sets out a new 'presumption in the favour of the retention of public houses'. This will help to ensure that any future proposals for redevelopment of land within the Willow Way LSIS site fully consider the pub and its amenity through the masterplan and design-led process. However it is acknowledged that the site allocation policy could be amended to provide more clarity on the need to protect the public house and its amenity. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. Willow Way LSIS site allocation amended to include new development guidelines around protecting the character and amenity of the pub.

3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** The Bricklayers Arms' is a brilliant community pub for people of all ages, it's one of the best and most unique pubs in Forest Hill and it would such a shame to lose it. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	Noted. The Council recognises the important role that public houses play in the local economy and Lewisham's distinctiveness. Therefore, the draft Local Plan Policy EC7 (Public houses) sets out a new 'presumption in the favour of the retention of public houses'. This will help to ensure that any future proposals for redevelopment of land within the Willow Way LSIS site fully consider the pub and its amenity through the masterplan and design-led process. However it is acknowledged that the site allocation policy could be amended to provide more clarity on the need to protect the public house and its amenity.	Willow Way LSIS site allocation amended to include new development guidelines around protecting the character and amenity of the pub. The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** The local business at the heart of Kirkdale, specifically the Bricklayers Arms and Delta Garage on Willow Way are both vital community hubs and ought to be protected and brought into the development, rather than falling at its hands. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** The local business at the heart of Kirkdale, specifically the Bricklayers Arms and Delta Garage on Willow Way are both vital community hubs and ought to be protected and brought into the development, rather than falling at its hands **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	Noted. The Council recognises the important role that public houses play in the local economy and Lewisham's distinctiveness. Therefore, the draft Local Plan Policy EC7 (Public houses) sets out a new 'presumption in the favour of the retention of public houses'. This will help to ensure that any future proposals for redevelopment of land within the Willow Way LSIS site fully consider the pub and its amenity through the masterplan and design-led process. However it is acknowledged that the site allocation policy could be amended to provide more clarity on the need to protect the public house and its amenity. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	Willow Way LSIS site allocation amended to include new development guidelines around protecting the character and amenity of the pub. The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

3	LWA	**1. Do you have any comments on the proposed vision?** Development on Willow Way must not threaten the Bricklayers Arms pub. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Development on Willow Way must not threaten the Bricklayers Arms pub. This is a really important pub for the local community – and the local community should be consulted on any proposals that might put its trade in jeopardy. Any development to the industrial space behind the pub should take this existing, much loved venue as an established part of the community, and not something that can be dispensed with if inconvenient. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Protect the Bricklayers Arms!	1	Noted. The Council recognises the important role that public houses play in the local economy and Lewisham's distinctiveness. Therefore, the draft Local Plan Policy EC7 (Public houses) sets out a new 'presumption in the favour of the retention of public houses'. This will help to ensure that any future proposals for redevelopment of land within the Willow Way LSIS site fully consider the pub and its amenity through the masterplan and design-led process. However it is acknowledged that the site allocation policy could be amended to provide more clarity on the need to protect the public house and its amenity.	Willow Way LSIS site allocation amended to include new development guidelines around protecting the character and amenity of the pub.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA1: West Area place principles **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Clyde Vale LSIS Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?**	0	Noted.	No change.

		N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** Yes too much how the doctors going to cope you can't a appointment noe 2. **Do you have any comments on the proposed key objectives?** Yes too much traffic now where to park mow **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA1: West Area place principles **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Clyde Vale LSIS Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies. A carefully managed approach to parking will need to be taken on new developments, having regard to the London Plan parking standards. This will be considered on a case-by-case basis on planning applications.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Land at Forest Hill Station West **6. Please provide your comments on the site allocation(s) selected above.** This development would drastically restrict the view for the residents on the other side of the railway track. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	Noted. The site allocation for Land at Forest Hill Station West includes development guidelines around design, including buildings heights, which will assist with the implementation of the Part 2 policies on High Quality Design, and refer to the site's relationship with buildings on the opposite side of the railway line.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?**	2	Noted. The Local Plan is required by National Planning Policy Framework to set a positive strategy for	The site allocation for the Willow Way employment site has been

		Willow way and Clyde vale developments are not viable. It is cramming more housing into already small overcrowded street. Clyde cake is a quiet road with a community spirit. This will be lost with overdevelopment. The Willow way development will mean losing vital businesses to the local area. The garage is vital to the local community and shouldn't be lost for yet more housing. **2. Do you have any comments on the proposed key objectives?** The objectives will lead to overcrowding and the loss of the community feel of Forest Hill. It is already a busy area, which does not have the space or amenities for more people. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Clyde Vale LSIS Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** **See comments above:** Clyde Vale is a quiet community road which simply cannot cope with more development. I strongly object as it's already over populated with no where to park. Willow way: loss of popular local garage which is vital to local community. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Stop overpopulating an area		delivering sustainable development, and within this context, meeting identified needs for new homes, workspace and jobs, and town centre uses along with supporting infrastructure. The London Plan sets a housing target for Lewisham which the Council must seek to address through the preparation of the local plan. It also directs Borough's to make the optimal use of land and sites, particularly in highly accessible locations such as town centres and their surrounds. The Council has undertaken a comprehensive assessment of land available for potential redevelopment to inform the preparation of the Local Plan. The amount of growth and development planned for the West Area is limited when compared to some other parts of the Borough (particularly Central and North areas). The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies. A carefully managed and more restrictive approach to car parking will be taken, in line with the London Plan parking standards. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** Development of brownfield sites (if which there seem to be several) is a good way to proceed Unstructured green spaces are the lungs of the city; they are few and far between and should be protected at all costs - especially as destroying them will damage the biodiversity of the area **2. Do you have any comments on the proposed key objectives?** I understand the need to more houses but, as mentioned, development of brownfield sites is far preferable then destroying green spaces. We need to protect all the remaining green spaces for future generations	8	Noted. A site screening process has been carried out as part of the land availability assessment which has informed the Local Plan, and the site allocations. Further information is set out in the Site Allocations Background Paper, which forms part of the local plan evidence base. The process has informed the identification of a number of brownfield sites within and around Forest Hill district centre for which site allocations have been prepared. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below LWA3: Forest Hill district centre **4. Please provide your comments on the topic(s) selected above?** Dilapidated areas and brownfield sites close to Forest Hill station would benefit from investment and redevelopment - but please do not destroy the few remaining green spaces **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** The impact of building 30 residential units would be very negative on the area - adding too many additional vehicles on a busy school road (danger to children) and having a negative impact on local services which already appear to be quite stretched The area near the radio mast is a small area containing some of the last remaining trees of the Great North Wood - which are home to various species of insects, birds and animals. These small green sites should be protected for the generations to come **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Please concentrate on reviving the various areas of dilapidated, run-down buildings and brownfield sites around Forest Hill station rather destroying any of the few remaining green areas that are vital to the health, welfare and happiness of the local community		removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Jenner Health Centre **6. Please provide your comments on the site allocation(s) selected above.** N/A	0	Noted.	No change.

		7. Are there any other issues and/or approaches for the area that you feel should be considered? N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** The vision needs to be clearer with more specific detail. **2. Do you have any comments on the proposed key objectives?** Objective 1 needs to be unambiguous in terms of what an 'interchange' is - it is NOT moving bus stops, it is reopening the platforms of the Dartford to Victoria railway line, interchanging with current Southern/Overground services. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA2: Connected network of town centres **4. Please provide your comments on the topic(s) selected above?** We need to be absolutely clear that a Brockley interchange is not simply moving bus stops. It's to reopen the high level line platforms to enable rail to rail interchange between the Overground/Southern services to the South Eastern services to Victoria which do not stop here. This gives local community rail connections east/west to complement the existing north/south facility. Additionally the waste land (hidden behind advertising hoarding) at the corner of Mantle road and Endwell Road can provide a secondary station entrance. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** 111-115 Endwell **6. Please provide your comments on the site allocation(s) selected above.** Bringing the 111-115 Endwell road site to a more 'in keeping' architecture style is needed. However, the height concern should be extended to the southern side - this is also residential. The impact of 65 new homes will be substantial on the local transport network. The trains through Brockley are already at capacity (outside of COVID) and it's unlikely more capacity could be added to existing lines. Reopening the high level line platforms between Dartford and Victoria will introduce large amounts of new capacity to central London and east to Lewisham centre - which currently doesn't exist **7. Are there any other issues and/or approaches for the area that you feel should be considered?** The site on the corner of Mantle road and Endwell road (eastern side of mantle road) is currently unused and hidden by advertising hoarding. This needs to be allocated to an interchange, along (potentially) with the disused yard at 28 Brockley Cross.	1	The Local Plan is a strategic policy document. Detailed plans for improving Brockley Station and services that serve the station will be discussed in collaboration with TFL and Network Rail. The Local Plan has been underpinned by the Transport Strategy, Local Implementation Plan and Rail Strategy. The Local Plan sets out an indicative capacity for the site allocation, which is based on a standard methodology taking into account site setting, public transport access and other considerations. Further details are set out in the Site Allocations Background Paper, which forms part of the local plan evidence base. The optimal capacity of the site will be established through design-led approach and the formal planning approvals process.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A	4	Land ownership information noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below LWA3: forest Hill district Centre **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS Havelock House Teleco Site **6. Please provide your comments on the site allocation(s) selected above.** Proposed residential site using backland to Haverlock House, Willow Tree House and Telecom Site: the proposed red line boundary includes privately owned land owned by Clarence Court Management Company as shown on HM Land Registry title SGL 430489. Local plan to be updated to not include this stretch of land. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** The Dartmouth service station has been servicing cars and doing MOT's for at least 20 years providing a good and valuable service for the local community and should not be closed. Good and reliable car mechanics are hard to find and I am sure all those who use this garage will be concerned at having to find another garage **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?**	9	Noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be	Local Plan amended to remove the site allocation for the Havelock House,

		I am in favour of the principles of protecting and enhancing green spaces and biodiversity as well as reducing the congestion and air pollution on the South Circular/Brockley Rise. There is an assumption that further house building is required, but how carefully has this assumption been tested? Following the Covid pandemic it will be important to assess how many retail units are needed in the area, and whether repurposing them may provide sufficient additional housing. **2. Do you have any comments on the proposed key objectives?** I support objectives 8 and 9 in particular **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** This is a small handkerchief of green space with old trees, almost entirely surrounded by residential dwellings. To plan to build on this land flies in the face of the stated objectives in the plan to protect biodiversity and enhance green spaces. Peregrine falcons as well as other birds visit it and nest nearby. The reservoir land on the other side of Horniman drive is in the process of being dug up and destroyed, to the detriment of surrounding houses, not to mention the wildlife there. To allow building to take place on the Havelock House site would be to add insult to injury. There has already been a large increase in traffic and air pollution around Horniman Drive and surrounding streets as a result of the increase in visitors to Horniman Museum and Gardens in recent years and the change of use of what was a care home at the other end of Horniman Drive. This is to the detriment of the health of residents as well as children at Horniman Primary School **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Any changes in traffic management should be assessed for unintended consequences such as rat runs through previously peaceful areas.		removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies. However specific traffic management interventions, such as Low Traffic Neighbourhoods, are generally outside the scope of the Local Plan.	Telecom site and Willow Tree House site.
3	LWA	**1. Do you have any comments on the proposed vision?** Yes don't do anything and save the Jennifer Health centre **2. Do you have any comments on the proposed key objectives?** No	0	Noted. The site allocation for Health Centre will enable the facility to be re-provided at the current site as part of a new mixed-use development. Any proposal for off-site re-provision would only be considered where other Local Plan policies on community infrastructure are satisfied.	No change.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Jenner Health Centre **6. Please provide your comments on the site allocation(s) selected above.** Do not do anything as this health centre is local, friendly and we need this for the public and pharmacy **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** In general I support the vision. It is sympathetic and thought through, if a little unambitious.. I especially like the proposals to protect and enhance the open and green spaces of the area and to preserve the woodland character of its historic landscape. However, I do not agree with the proposal for housing development at the Havlock House Telecom Site. This would not be in keeping with the protection and enhancement of green spaces and would be harmful to the character of the surrounding area. **2. Do you have any comments on the proposed key objectives?** They are adequate as far as they go but could do more on curbing air and noise pollution, particularly around schools; creating more routes for walking and cycling and introducing measures to increase biodiversity. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** The proposal to build 30 homes on the Havlock House Telecom Site is misconceived. Not every Piece of land has to be built on! People need space. This site is another fragment of the Great North Wood which the plan says it wants to protect and enhance. The steeply sloping site is not suitable for housing: it would destroy a long established habitat for wildlife; lessen the quality of life for nearby residents, particularly those in Havelock House who wold be completely overlooked from above and it would put a strain on local resources. Even if it was a suitable site for	7	Support for vision noted. The objectives for the West Area are generally spatial objectives. Part 1 of the Local Plan sets out wider strategic objectives which address matters such as air quality, sustainable transport and movement and green infrastructure. These borough-wide objectives should be taken together with the area-specific ones. Noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		housing development, a density of 30 homes is far too high and nothing above 10 homes should be contemplated. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** No			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** 113-157 Sydenham Rd 74-78 Sydenham Rd 154 -160 Sydenham Rd **6. Please provide your comments on the site allocation(s) selected above.** Too much density housing. Why should local people have to go to Bell Green or Lewisham to go to Lidl Aldi. when there is a popular Lidl with parking already there. The nature and character of that part of Sydenham Road would be demolished. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Why arent there more areas designated for uses other than housing. Where do you think people will work and how far will they have to travel which negates the idea of localism. Not everyone works from a screen ..	0	Noted. The site allocations signposted are for the mixed-use redevelopment within a town centre location, and will enable the provision of commercial or retail units at the ground floor level with residential above. They will continue to allow for employment opportunities in the local area. The site allocations would not preclude existing supermarket from continuing to operate at the location. The policy proposals are considered to be in accordance with the London Plan, which directs the Local Plan to promote managed growth and development within and around town centres and other accessible locations. Development requirements and design guidelines have been included to ensure that any future planning applications take account of and respond positively to local character through the design-led approach.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?** Dartmouth garage is in the area **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		6. Please provide your comments on the site allocation(s) selected above. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** This area cannot support that kind of massive influx of residents. Our fairly quiet residential area will be desperately overpopulated and pose a very real safety threat. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Put some money into improving Sydenham High Street and the old High Street. Improve the train station and roads. Moving a few thousand more people in will destroy our quiet little suburb. What a disaster this would be!	1	Noted. The policy proposals are considered to be in accordance with the London Plan, which directs the Local Plan to promote managed growth and development within and around town centres and other accessible locations. The Local Plan sets out an indicative capacity for the Willow Way LSIS site allocation, which is based on a standard methodology taking into account site setting, public transport access and other considerations. Further details are set out in the Site Allocations Background Paper, which forms part of the local plan evidence base. The optimal capacity of the site will be established through design-led approach and the formal planning approvals process. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure. The Local Plan includes a number of objectives and proposals to support the long-term vitality and viability of Sydenham High Street.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?** The buildings planned aren't in the character of the area. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected	0	Noted. The Local Plan sets out a spatial strategy for the Borough and directs new growth and development to key areas, including the London Plan Opportunity Area corridor, town centres and other growth and regeneration nodes. The strategy has been informed by the Lewisham Characterisation Study. The site allocations will help give effect to the spatial strategy. These set out land-use principles and development guidelines. However the design of any future development will be considered through the planning approvals process.	No change.

		6. Please provide your comments on the site allocation(s) selected above. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** I am a resident on Horniman drive and saw the notice on the telegraph pole by the gates Into the telecoms site that development was being proposed. At the same time the reservoir site across the road from me has been devastated. I looked into the havelock house site, and there were four foxes in daylight obviously evicted from the reservoir site opposite. We cannot just ignore nature. There are a variety of nests and trees fauna and flora that has been undisturbed on this site and we should try to preserve and not destroy these precious natural spaces. Building always disturbs the terrain up on this hill. There is great risk of subsidence The traffic has become.so busy on Honor oak road going down to the Tesco garage it is invariably at a standstill. Adding more houses in this area would create more pollution, something we collectively should be responsible for **7. Are there any other issues and/or approaches for the area that you feel should be considered?** We are hoping that more trees will be planted in our areas. It makes little sense to be knocking down established trees whilst planting saplings.	8	Noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A 2. D**o you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	0	Noted.	No change.

		4. Please provide your comments on the topic(s) selected above? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** I am very disappointed to hear about the proposal, the effect on the local area, blocking out the light, I will be overlooked, the noise potential, I have lived in the area for many years and the thought of the disturbance, air quality etc will make me want to move! **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I am very disappointed to hear about the proposal, the effect on the local area, blocking out the light, I will be overlooked, the noise potential, I have lived in the area for many years and the thought of the disturbance, air quality etc will make me want to move! **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	Noted. The draft Local Plan site allocation for Willow Way LSIS sets out land-use principles and development guidelines for the site. There are no detailed designs for the site allocation proposed in the draft Local Plan, as this will be considered as part of any future planning application. Part 2 of the draft Local Plan includes a refreshed suite of polices which address amenity and will ensure development proposals demonstrate how they will avoid and/or appropriately mitigate such impacts.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		4. Please provide your comments on the topic(s) selected above? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** The site is presently occupied by an amazing garage called Dartmouth Motors. This garage provides an essential and much needed service to the community. It is an outstanding garage , family run which provides a wealth of experience for every car owner who trusts this garage with their vehicle. They never rip off their customers and keep us all safely on the road.If this garage is forced to close because of the proposed development, it'll be a tragedy for the community. Please don't allow this to happen. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** It's vague and doesn't explain the true impact of new building. It doesn't acknowledge that existing buildings could be redeveloped for housing and workspace. It doesn't admit that 'genuinely affordable' is unlikely to be true for those who are displaced by new developments. whilst the idea of allowing for cycling and green spaces is positive, it has to be democratic - not just for those who can pay a premium for living in a renewed, regenerated 'cultural quarter'. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA1: West Area place principles **4. Please provide your comments on the topic(s) selected above?** The principles are vague and some contradict others. How will the development of the areas around the station impact in terms of increased traffic? **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Noted. The Council acknowledges the issues around housing affordability. The Local Plan therefore proposes a strategic target for 50% of all new homes to be genuinely affordable, which is now proposed to be measured on the basis of local income levels. The place principles are considered to provide an appropriate and proportionate level of detail for a strategic document. Part 2 of the Local Plan includes detailed development management policies covering a range of policy areas, which should be read in conjunction with the Part 3 policies. In terms of transport and traffic, he Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies. For major developments, the Local Plan makes clear that Transport Assessments will be required with planning applications, and that these will need to manage and appropriately mitigate adverse impacts on the highway network.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?**	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by	The site allocation for the Willow Way employment site has been

		This is not ok. The Dartmouth garage is the best garage around and the only one walkable for when my car needs a service or anything. The buildings would dwarf and overshadow other buildings in the area and I think it would be awful. Please do not destroy my ONLY garage. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. Part 2 of the draft Local Plan includes a refreshed suite of polices which address amenity and will ensure development proposals demonstrate how they will avoid and/or appropriately mitigate such impacts (such as overshadowing).	amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** I like the proposal to connect green spaces and foster the wooded nature of the area. I think there's lots of potential here eg Lewisham Link, Hilly Fields, Ladywell & Brockley cemetery (please open the Ladywell gate it would make it much easier to connect to Hilly Fields!), Blyth Hill, One Tree Hill, Camberwell New Cemetery (although the latter two are I think in Southwark). **2. Do you have any comments on the proposed key objectives?** See above **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** I am concerned that the use of land for housing would lessen the wooded, green character of the area. Losing this are would also reduce the remnants of the historic Great North Wood, which local green action groups are working to retain and	12	Noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		enhance rather than destroy. Finally development would lead to a loss and reduction of important fauna and flora habitat and wildlife corridor. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** Less high rise developments please **2. Do you have any comments on the proposed key objectives?** Low rise 2-3 stories should be the maximum and not to the detriment of local businesses. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** The Dartmouth Road Garage, where the Willow Way proposal is located, provides an essential service for the local community, it would be very detrimental if this was removed. There are very few such reputable and trustworthy motor mechanic garages in the area. The proposed development at Willow Way would remove this essential service and the vast knowledge the garage owners and workers have of their local community. The development proposed is high rise - ie above 3 storey - this would impact the local area negatively and create too dense inhabitation. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Allow Dartmouth Road Garage to stay. Dont put developers before local businesses.	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. The London Plan provides a clear direction that tall buildings have a role to play in meeting London's housing needs. The draft Local Plan Part 2 includes a policy on building heights. Following the Regulation 18 consultation, additional work has been undertaken on the Council's Tall Building Study, and this will be used to inform the setting of more detailed standards around building heights in different parts of the Borough.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below**	3	Noted. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set out clearly in Part 2 Transport policies. The site allocation for the land and Sydenham Road and Loxley close builds on the London Plan and draft Local Plan transport policies, while seeking to make a more optimal use of land in a town centre location. The draft policy includes development guidelines which provide that options for the car park, including rationalising the existing level of provision, must take into account the	No change.

		Land at Sydenham Rd and Loxley Close **6. Please provide your comments on the site allocation(s) selected above.** I am deeply concerned about the proposal to redevelop the public car park on the land between Sydenham Road and Loxley Close. This is the only public car park in this part of Sydenham and the local shops and businesses need this car park to continue in order to sustain their businesses. The proposal to turn the car park into 131 homes is an overdevelopment of the site. Some form of public car park of an adequate size needs to remain for the benefit of the local community otherwise local residents will face even more challenges with visitors parking outside their homes and shops will suffer with fewer visitors. Also, the proposal to build over 300 new homes in the same small area of Sydenham between 74-78 Sydenham Rd, 113-157 Sydenham Rd and Sydenham Road and Loxley Close means local services such as GP surgeries, which are already struggling with capacity, will be completely overwhelmed. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** There should be fewer houses on this site (Sydenham Road and Loxley Close) and more land retained for a public car park.		needs of visitors and businesses along with public transport accessibility levels. Should any development proposal come forward, the level of car parking provision will need to be investigated and sufficiently justified. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** I am very concerned about the environmental impact of the proposed development of this site. The area contains mature oak trees and woodland which is habitat for numerous species, including a nesting site for peregrine falcons which we enjoy seeing regularly. There is no way that such species would remain if the area were developed. The Tewkesbury Lodge residents have been planting additional trees in the local area to improve the environment, so it seems absurd that Lewisham Council would then be planning a development which inevitably would result in a loss of trees in the area. I am also concerned about the additional traffic and strain on local facilities such as schools. Getting off the estate can already be difficult at times due to the congestion on roads such as Honor Oak Road, so additional residents and their cars will only compound that problem. The two nearest primary schools (Fairlawn and Horniman)	12	Noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		are popular and already at capacity so what provision has been planned for additional school capacity? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** Yes l do as l have been Dartmouth Garages for 30 years and they provide a valuable service to the community **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** Yes l am against any proposal as l have been using Dartmouth Garages for 30 years and they provide a valuable service to the community .l will be objecting to any proposal to get rid of the garage and the land. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** just to changing Dartmouth Road and the garage as this will rip the heart out of the community.	4	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.**	1	Noted. The site allocation for Willow Way LSIS sets out land-use principles and development guidelines. It does not provide specific information about building heights, which will be considered through the planning approvals process should any future application come forward. Both the adopted and draft Local Plan include policies dealing with the protection of amenity, including on neighbouring properties (such as for privacy, overlooking, noise, light, etc.). Development proposals will need to demonstrate that they have identified and suitably addressed amenity impacts.	No change.

		With regards to Willow Way, living on the 3rd floor at 85 Willow Way I would want to know more information about the redevelopment plans. 3 or 4 storey flats next to ours will significantly impact our light levels and the wonderful views across Lewisham. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** The wild life an climate change mean that we must not destro areas of interest for both issues. New built must be done where the land isn't as precious for wildlife and climate issues. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** The wild life an climate change mean that we must not destro areas of interest for both issues. New built must be done where the land isn't as precious for wildlife and climate issues. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	10	Noted. The Local Plan recognises and seeks to respond to the issue of global climate change and nature conservation. This is reflected in the plan's strategic objectives. Detailed policies addressing these matters are set out in Part 2 of the Local Plan on Sustainable Design and Infrastructure, and Green Infrastructure respectively. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.
3	LWA	**1. Do you have any comments on the proposed vision?** Area character - damage to the wooded, green character of the area. Historic Significance - remnants of the historic Great North Wood need be retained and connected - not destroyed. Biodiversity and wildlife – loss/reduction of important fauna and flora habitat and wildlife corridor. Urban greening – loss of a green space and associated health benefits (air quality). Additional Vehicles - issues of access and congestion. Local services – additional pressure on schools, medical services, rubbish collection, utilities etc. Hill views and vistas – should be protected and enhanced not interrupted with development.	8	Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		2. Do you have any comments on the proposed key objectives? Unnecessary **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.** Area character - damage to the wooded, green character of the area. Historic Significance - remnants of the historic Great North Wood need be retained and connected - not destroyed. Biodiversity and wildlife – loss/reduction of important fauna and flora habitat and wildlife corridor. Urban greening – loss of a green space and associated health benefits (air quality). Additional Vehicles - issues of access and congestion. Local services – additional pressure on schools, medical services, rubbish collection, utilities etc. Hill views and vistas – should be protected and enhanced not interrupted with development. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** No			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Havelock House **6. Please provide your comments on the site allocation(s) selected above.**	11	Noted. Informed by feedback from the Regulation 18 consultation, the Havelock House site allocation will be removed from the Local Plan. Whilst the site area is roughly 1.5 ha and therefore warrants consideration as a strategic site, it is acknowledged that site constraints limit the potential developable area. Should any future planning application come forward for redevelopment on this predominantly backland site, the proposal will be considered against other Local Plan policies.	Local Plan amended to remove the site allocation for the Havelock House, Telecom site and Willow Tree House site.

		I have read the brief proposal for the redevelopment of backland for residential use and am wholeheartedly opposed to it. Any development would damage the wooded green character of the area, which contains remnants of the historic Great North Wood which need be retained rather than destroyed. Development of this green backland would result in a loss of important fauna and flora habitat and would threaten wildlife. Any loss of green space in an urban area such as ours has knock on effects on air quality and therefore on health. Additional housing in an area which is already heavily populated inevitably leads to additional vehicles, which cause access and congestion issues, as well as vcreating additional pressure on local services such as schools, medical services, rubbish collection and utilities. I appreciate that the Council is under pressure to meet targets for new homes but destroying rare green backland space in the process is a thoroughly negative approach to the challenge. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** I'm worried about the wording for 're-provision' of the Jenner health centre. You cannot build more housing and get rid of the GP- getting an appointment is competitive enough without getting rid of another GP in the area and bringing more residents in. **2. Do you have any comments on the proposed key objectives?** Again - I'm worried about the wording for 're-provision' of the Jenner health centre. You cannot build more housing and get rid of the GP- getting an appointment is competitive enough without getting rid of another GP in the area and bringing more residents in. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** Again - I'm worried about the wording for 're-provision' of the Jenner health centre. You cannot build more housing and get rid of the GP- getting an appointment is competitive enough without getting rid of another GP in the area and bringing more residents in. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Jenner Health Centre **6. Please provide your comments on the site allocation(s) selected above.** Again - I'm worried about the wording for 're-provision' of the Jenner health centre. You cannot build more housing and get rid of the GP- getting an appointment is competitive enough without getting rid of another GP in the area and bringing more residents in.	1	Note. The site allocation for Health Centre will enable the facility to be re-provided at the current site as part of a new mixed-use development. Any proposal for off-site re-provision would only be considered where other Local Plan policies on community infrastructure are satisfied. The draft policy is considered to be consistent with the relevant London Plan policies regarding social infrastructure. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	No change.

		7. Are there any other issues and/or approaches for the area that you feel should be considered? Again - I'm worried about the wording for 're-provision' of the Jenner health centre. You cannot build more housing and get rid of the GP- getting an appointment is competitive enough without getting rid of another GP in the area and bringing more residents in.			
3	LWA	**1. Do you have any comments on the proposed vision?** REF: Jenner Health Centre I really think this is a awful idea. The Health centre has been there for in excess of 30 years with more than 15,000 registered patients nearby. It is a hub for our healthcare system with a surgery, dentist, chiropractor and Pharmacy all under one roof. Removing the health centre will deprive the whole community in and around Lewisham. It is probably the biggest surgery in Lewisham and is VITAL it remains. The site is very well located with enough space for a few cars for elderly patients who have no other means of transport **2. Do you have any comments on the proposed key objectives?** Developing the area is good but removing our healthcare infrastructure is a bad idea and will affect the whole local area. I'm sure thousands of people will agree with me. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA4: West Lewisham Links **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Jenner Health Centre **6. Please provide your comments on the site allocation(s) selected above.** The Jenner Health Centre is vital for our community where all healthcare professionals work and is known for the one place to go for any issues. It is the largest health centre In Lewisham and is used by over 15,000 registered patients. Closing down the health centre or re-locating would be awful. The Pharmacy is right next door and is ideal for elderly patients so they don't have to travel much. There is space for a few cars and is good as some elderly patients do not like using the public transport. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Yes, Please DO NOT touch the Jenner Health Centre. It is most needed where it is and should remain untouched.	1	Note. The site allocation for Health Centre will enable the facility to be re-provided at the current site as part of a new mixed-use development. Any proposal for off-site re-provision would only be considered where other Local Plan policies on community infrastructure are satisfied. The draft policy is considered to be consistent with the relevant London Plan policies regarding social infrastructure. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?** While I support the idea of improving areas for cycling and walking, developments should not be made that destroy any areas that we have of thriving wildlife and older trees that provide the historic link to the Great North wood. we know now that roads and housing which take away this type of area destroy vital biodiversity.	4	Noted. Part 2 of the Local Plan on Green Infrastructure sets out detailed policies concerning the protection and enhancement of green/open spaces and biodiversity. Part 3 of the Local Plan provide further details to support these borough-wide policies. The spatial objectives and policies for the West Area refer to the	No change.

		2. Do you have any comments on the proposed key objectives? N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA3: Forest Hill district centre **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		importance of the Great North Wood and area's woodland character.	
3	LWA	**1. Do you have any comments on the proposed vision?** It would be wrong to put any new development of houses and flats in a green space which is a haven for wildlife including birds, bees and wildflowers **2. Do you have any comments on the proposed key objectives?** Even if the plans involve maintaining the oak and other trees, which I doubt, it would be bad planning to destroy any green sites **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA4: West Lewisham Links 4. Please provide your comments on the topic(s) selected above? The land on the top of Forest Hill should be maintained GREEN wherever possible. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	3	Unable to identify site that is being commented on.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A	1	Noted. The site allocation for Willow Way LSIS sets out land-use principles and development guidelines. Both the adopted and draft Local Plan include policies dealing with the protection of amenity, including on neighbouring properties (such as for privacy, overlooking, noise, light, etc.). Any future development	No change.

		3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Living at Moore House, Willow Way, residents have already lost a lot of light from the development at the former Sydenham Police Station, and now we are set to lose a lot more with this continued development on the street. And where is all the extra parking going to be? Willow Way already is used as a cut-through by people not wanting to deal with the roundabout at the end of Dartmouth Road or the traffic lights on Kirkdale, and such a huge development will futher build noise and traffic. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		proposals will need to demonstrate that they have identified and suitably addressed amenity impacts. Parking provision will need to be carefully managed and considered in line with the London Plan parking standards. In general, the Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies.	
3	LWA	**1. Do you have any comments on the proposed vision?** We've already had to put up with the noisy, disruptive redevelopment of Sydenham school, the new flats on the site of the old Sydenham Police station and now this. I'd agree that the derelict land on Willow Way is an eyesore could do with some development but not at the expense of established businesses like Dartmouth Service Station. It's a very important service provider to us as local residents and we are told they were not consulted before this plan was made public **2. Do you have any comments on the proposed key objectives?** Why not propose more green spaces, parkland, children's play areas or places where we can have outdoor markets like Brockley Market?? You could have more recycling points or use the space for parking for neighbouring businesses in the Kirkdale/Dartmouth Rd area. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected 4. Please provide your comments on the topic(s) selected above? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS Former Sydenham Police Station **6. Please provide your comments on the site allocation(s) selected above.** We've already had to put up with the noisy, disruptive redevelopment of Sydenham school, the new flats on the site of the Former Sydenham Police station and now this	3	The West Area key objectives and policies provide a direction for protecting and enhancing open/green spaces and improving walking and cycle routes between these via the Lewisham Links proposals. The Willow Way site allocation sets out requirements for the delivery of new and improved public realm. Any residential element will need to make provision for children's play space, as set out in draft Local Plan, Part 2 Policy CI3 on play and informal recreation. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. Parking provision will be need to be carefully managed and considered in line with the London Plan parking standards. In general, the Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies.	Sydenham Police station removed as site allocation. The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		LSIS. I'd agree that the derelict land on Willow Way is an eyesore could do with some development but not at the expense of established businesses like Dartmouth Service Station. It's a very important service provider to us as local residents and we are told they were not consulted before this plan was made public. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** The 33 new flats that are almost completed on the site of the Former Sydenham Police Station have caused extensive eyesore, noise pollution to the surrounding residents and put increased pressure on the lack of local parking. These parking issues will become more apparent once the flats are inhabited as the residents have only been allocated 4 parking spaces on the development and will spill out onto the local streets that struggle with parking as it is. Terrible idea to remove already established businesses that support the surrounding residents greatly. The proposed flats will make the area incredibly claustrophobic, reduce light levels for current residents and oversaturate residential capacity very negatively.			
3	LWA	**1. Do you have any comments on the proposed vision?** This proposal will close a business that me and a lot of other people I know use very often. We need this business. Also the parking in the area is terrible as it is and more flats would make this so much worse **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS 6. **Please provide your comments on the site allocation(s) selected above**. This proposal will close a business that me and a lot of other people I know use very often. We need this business. Also the parking in the area is terrible as it is and more flats would make this so much worse **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. Parking provision will need to be carefully managed and considered in line with the London Plan parking standards. In general, the Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** There are already new large housing developments underway in Mayow Rd, with little parking offered and no sign of new schools/doctors etc being provided to help those already oversubscribed to cope with the influx of new residents, now you want to demolish valuable parts of the high street (which you describe as ugly and needing improvement) and add more ugly housing. You should be working with existing businesses to improve them and enable to SE26 community to thrive. More housing and less businesses on our high street will mean less footfall and more car	3	As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan.	No change.

		use. Lockdown has shown that people want to shop local. If you want to improve Sydenham Rd, put more effort into the shops that open so that they are useful to the community, limit the number of nail bars, chicken shops, phone shops etc, and support those that are successful to have more visual appeal and benefit the high street, instead we have empty and rundown shops, or shops that only last 2 minutes. Thousands we spent improving the high street but now it's a mess as vehicles park on the pavement etc. **2. Do you have any comments on the proposed key objectives?** Stop trying to make money by over development in an area that is already highly populate & gridlocked with traffic, becoming impossible to park. You should focus on improving the businesses already here (The Bridge for example!) these plans are poorly thought out and are all money focussed. I see from other comments that you haven't even engaged with some of the businesses that you plan to demolish, this is outrageous. We should consider making them community assets to protect them: the Golden Lion, Bishops Furniture Stores, the undertakers etc. Sydenham has a lovely community, if you demolish these places you will lose that community, plus the Audi garage and Enterprise bring non-locals to our thriving high street to spend money. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Land at Sydenham Rd and Loxley Close 113-157 Sydenham Rd 154-160 Sydenham Rd 74-78 Sydenham Rd **6. Please provide your comments on the site allocation(s) selected above.** Over development over development over development! No thoughts for parking, adding traffic to an already congested neighbourhood, no increase in school places for over subscribed schools, and removal of successful businesses on those sites. Suit this money grabbing plan. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Improve Sydenham Rd from Knighton Park towards Bell Green, Home Park and the library, this needs some serious investment (the shops and business here seem totally over looked) and will make all of Sydenham Rd join up into 1 successful area, not a road of many sections.		The Council does not make money from development. Most of the site allocations within the Local Plan are owned by third parties. The Local Plan must plan proactively for future growth and has to demonstrate that it can accommodate the London Plan target of 1,667 new homes per year. The indicative site development capacities have been set using a standard methodology, as set out in the Site Allocations Background Paper. The optimal capacity of the site will be established at through the planning application process, and informed by the designed-led approach.	
3	LWA	**1. Do you have any comments on the proposed vision?** Improving the quality of life of local residents whilst keeping employment and local businesses alive should be a priority for the developed areas. **2. Do you have any comments on the proposed key objectives?**	1	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This

		N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** My comment is solely related to Dartmouth Garage on Dartmouth road. I think this garage should be kept and its settings and premises improved as part of the local plan. There isn't many garages around here and this one as a very good reputation with the neighbourhood. I also would like to include into my comment the car body shop garage (Anerley Car Crash Repairs) which is adjoining of Dartmouth garage but under a different business ownership. They (both) are very professional and are doing top quality work, and these types of professionals are hard to find nowadays, They are also affordable, honest and reliable and this is partly why they are so popular and successful. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. The draft Local Plan includes a refreshed suite of policies on employment land management, as set out in Part 2 on Economy and Culture. The Council considers that the proposals amount to a strengthening of protection for both designated and non-designated employment sites for commercial and industrial uses. Continued protection of Willow Way will be made through its designation of a Locally Significant Industrial Site, where the co-location of employment and other complementary uses will be supported.	includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** It should be much more environmentally focussed, with an ambitious, radical and inspiring aim to make Lewisham completely sustainable. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Although I understand that customers of the garage at Willow Way feel strongly that they don't want to have to go further away to get their car serviced, they are a tiny minority of residents. The majority of households in Lewisham do not own a car.	2	The draft Local Plan has been prepared in line with the National Planning Policy Framework and its principles for sustainable development, as well the London Plan policies around 'Good Growth', which is defined as growth that is socially and economically inclusive and environmentally sustainable. The draft Local Plan acknowledges the issue of the global climate emergency. Informed by the Council's Climate Emergency Action Plan it includes a suite of policies to support the transition to low and zero carbon development, including for requirements for new buildings, support for the retrofitting of existing stock, and enabling modal shift away from private car use to more sustainable modes, and urban greening. Further details are set out in the Part 2 policies on Sustainable Design and Infrastructure, Transport and Connectivity, and Green Infrastructure respectively. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and	No change.

		We need to move away from a car-dominated urban landscape, which at the moment allows a minority of car owners to damage the health of everyone. As polluting cars and vehicles are phased out and people either switch to electric vehicles or swap to more environmentally friendly and safer forms of transport like walking, cycling and public transport, there will be much less need for garages servicing petrol and diesel cars (electric cars need far less servicing). **7. Are there any other issues and/or approaches for the area that you feel should be considered?** A long-term mindset needs to be embedded in every aspect of the council's plans. Every decision now should work towards a sustainable, equitable and pollution-free future. No housing should be built unless it is able to run completely on minimal, clean energy. Private car ownership should eventually be phased out completely from the whole of Lewisham. Walking, cycling, car-share, public transport and other positive, sociable, healthy and planet-friendly modes of transport should be encouraged. Streets should be reclaimed from traffic, polluting businesses should be taxed, and rebates should be given to those businesses working for clean air, water and biodiversity. Every residential street should be made into a home zone where children can play safely. Every road should prioritise pedestrians over motorised and polluting traffic. There needs to be a massive tree-planting and biodiversity campaign. Every street should become an avenue of trees. Walking though Lewisham - which for many of us has made lockdown bearable - should be a pleasure, not a gauntlet of polluted air and dangerous driving.		policies and are set out clearly in Part 2 Transport policies. However, speed limits are outside the scope of the local plan. The Local Plan will be subject to independent examination and the plan must be demonstrably 'sound', including that it is in line with higher level policies and deliverable. Whilst acknowledging some of the proposals suggested and need for radical action, a balance will need to be struck in order to ensure the plan can be found sound.	
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA3: Forest Hill district centre **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS 6. Please provide your comments on the site allocation(s) selected above. We need the garage and the parking lot. The building they just built is ugly and seems out of place. The small businesses in our area are vital to this end of Forest hill and it would be a disaster if they went out of business for flats. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	Noted. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house..	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A	1	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow	The site allocation for the Willow Way employment site has been amended to provide more

		2. Do you have any comments on the proposed key objectives? N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** here are plans to close the local garage Dartmouth Motors. This is the only garage locally. The people there have been there years. I feel safe in the knowledge that when I take my car there I am not going to be ripped off or them say works have been carried out when they haven't. People will not know where to look or go to for a local garage. This garage is the absolute best and me personally would hate to see it go. I appreciate people need houses but you are taking every available space to build homes. I get it I really do but please don't take away something that means so much to our community. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Yes, leave our garage alone. Find somewhere else to build your houses. This garage is vital to our community.		Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Whilst acknowledging the need for the area at the back of Willow Way to be properly utilised, I have been using the Dartmouth Road Garage for about 20 years and have relied on its proximity and accessibility (alongside the excellent customer service). It is part of the fabric of the area which adds to making it a desirable location to live and work. Even with the move to greener transport there will be an	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		ongoing need for vehicle maintenence be it carbon neutral or legacy. I would not be happy to loose this amenity. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** What gives the Council the right to do this as they do not own the land and it will ruin a business that pays tax and employs local and skilled people, added to that the Council did not even inform the business owner that this was being considered. By doing this it will destroy viable businesses putting numerous people out of work which will be bad for the economy and bad for the family of those affected. Dartmouth Service Station has been part of the trusted community and is a reliable and good addition to it and should not be treated in the the way it is. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	Noted. The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA3: Forest Hill district centre **4. Please provide your comments on the topic(s) selected above?** N/A	1	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. The Council recognises the important role that public houses play in the local economy and Lewisham's distinctiveness. Therefore, the draft Local Plan Policy EC7 (Public houses) sets out a new 'presumption in the favour of the retention of public houses'. This will help	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. Willow Way LSIS site allocation amended to include new development guidelines around protecting the character and amenity of the pub.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** **too much stress on schools and doctors with increase of housing** loosing the garage and pub **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		to ensure that any future proposals for redevelopment of land within the Willow Way LSIS site fully consider the pub and its amenity through the masterplan and design-led process. However it is acknowledged that the site allocation policy could be amended to provide more clarity on the need to protect the public house and its amenity.	
3	LWA	**1. Do you have any comments on the proposed vision?** It feels like all Lewisham Council are interested in is more housing, and they care more about future residents than current ones! Firstly, do we know the impact of Brexit and covid on the population of London yet? There may not be a need for more housing if the population decreases. Secondly, I agree everyone needs a home, but said home does not need to be in Lewisham. Homes should be built in places that that have the space and means to accommodate them as members of a community, not just physically in a building. So why then wouldn't Lewisham be pushing back at other London boroughs who haven't built any social housing for decades (Wandsworth for example). Or areas of East London with lower levels of population density. **2. Do you have any comments on the proposed key objectives?** Don't just build more and more cheap flats. Won't these soulless monoliths with no outdoor space create awful living environments for people? Think beyond your own doorstep because Greater London needs to tackle the housing crisis as a county. There are less populated areas where new builds could go, complete with more indoor and outdoor space. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** If you have to shut down businesses to build houses then perhaps it's a sign that said houses need to be built elsewhere. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Don't build more housing until existing problems are sorted. Example fly tipping, speeding, people begging outside Tesco who are intimidating, Thames Water, lack of provisions for pedestrians and cyclists, lack of trains.	2	The Local Plan sets out a positive strategy for managing future growth and development across the borough, having regard to the Good Growth policies set out in the London Plan and the principles of sustainable development set out in Government's National Planning Policy Framework. Like all London Boroughs Lewisham is trying to tackle a housing crises and are directed by the London Plan to plan positively to meet its housing targets of 1,667 homes per annum.	No change.

		It's good to have a vision, but basic, boring things that really matter to residents aren't being provided. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Sadiq Khan, Labour Mayor, Wandsworth born, bred and resident, needs to start building social housing there! To relive other boroughs like Lewisham who are struggling to cope and provide basic services as it is.			
3	LWA	**1. Do you have any comments on the proposed vision?** These proposals are very unclear. While I appreciate the desire to regenerate areas of Lewisham, fluffy visions with no clear plans like this are confusing. It appears that you want to tear down large areas of our local community and even if that's with a desire to put new buildings in, it appears very poorly thought out. **2. Do you have any comments on the proposed key objectives?** I like the idea of regenerating and modernising Lewisham and introducing more green space. This is a good thing to aim for. Affordable housing though... really? I would love to believe you but you're not going to be able to deliver that unless the entire housing market in the UK crashes in spectacular fashion. The borough, and London as a whole is already over-populated so what good is more housing going to do? **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** This area needs development and some love, but the proposal looks like you want to tear down a huge area, including many local and longstanding businesses which are a credit to the community, like Cuddly Bear nursery and Dartmouth Road Service Station. Instead of ripping up Willow Way, why don't you just tidy it up? Get rid of the derelict cars that litter the pavement and develop the land that is vacant. Leave the existing businesses, maybe even give them some funds to liven up their buildings? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Tidy up the road, stop it being a rat run by blocking it off halfway along, widen the pavements, fix the pavements, plant trees, restrict parking.	3	The Local Plan is a strategic policy document that sets out the vision, objectives and policies for future growth and investment in the borough. The plan has been informed by and informs a number of more detailed studies including the Characterisation Study, New Cross Area Framework, Catford Framework and other evidence base documents and SPDs. The Local Plan identifies those site allocations that are required to meet its London Plan housing targets of 1,667 homes per year.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?**	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow	The site allocation for the Willow Way employment site has been amended to provide more

		N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** As a valued customer of Dartmouth Service Station for almost 20 years, I am shocked and saddened by the proposals which would involve a compulsory purchase order on the site. DSS is a fantastic business providing much needed employment as well as a valuable service as a garage. I have used nothing else for MOTs, services, repairs etc. etc. for many many years. Please reconsider! **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. The draft Local Plan does not include any details or proposals around the compulsory purchase of specific land or sites.	certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** 74-78 Sydenham Rd 154-160 Sydenham Rd 113-157 Sydenham Rd Land at Sydenham Rd and Loxley close **6. Please provide your comments on the site allocation(s) selected above.** Over development without sensitivity to existing terraced housing neighborhoods. Will result in the high street merging into residential areas. Impact on parking for existing residents will be catastrophic. Consider need for electric vehicle charging for existing housing with no space to park outside. **7. Are there any other issues and/or approaches for the area that you feel should be considered?**	1	The indicative site development capacity has been set using a standard methodology, as set out in the Site Allocations Background Paper. The optimal capacity of the site will be established at through the planning application process, and informed by the designed-led approach.	No change.

		Impact on parking for existing residents will be catastrophic. Consider need for electric vehicle charging for existing housing with no space to park outside.			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Dartmouth Motors is a well-liked and trusted business that has worked hard over many, many years to give excellent service to its loyal customer base. You should be doing your best to encourage trustworthy family enterprises like this, not threatening to kick them out! More and more bland, cramped flats and fewer and fewer useful businesses is really not going to improve this area. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** I am referring specifically to the plans for 6 Mantle Road. I support regeneration but would want to see full proposals before commenting further on it's accepability. I live at 4 mantle road and am concerned that a large-scale block of flats will look directly into my flat, block light and also be extremely noisy during delivery. When will the full plans be made available please? 2. **Do you have any comments on the proposed key objectives**? Regeneration on this plot around Brockley station is to be welcomed, as long as it is sensitively and appropriately done **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** 6 Mantle Rd	0	Noted. The draft Local Plan Site Allocation policy for 6 Mantle Road sets out land use principles along with development requirements and guidelines for the site. Detailed proposals for site redevelopment would be set out in a planning application, should one come forward, and which the Council will assess against the site allocation and other Local Plan policies. Both the current and draft Local Plan include policies dealing with protection of amenity, including for properties surrounding proposed development sites. This includes consideration of outlook, privacy, light, noise and other disturbances. The draft Local Plan broadly seeks to improve the quality of the public realm around town and local centres, as well as stations and key transport nodes. The West Area policies include proposals for enhancing the area around Brockley station.	No change.

		6. Please provide your comments on the site allocation(s) selected above. As above **7. Are there any other issues and/or approaches for the area that you feel should be considered?** More green space and cafe areas. The space on the east of brockley station has been a triumph in creating a community space that is green, encouraging SMEs, and making a desirable place to visit at all times of day. It would be good to see plans on the west of Brockley station achieve the same feel - rather than just being a bit box of flats (which is what I fear will be proposed!)			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Been a customer of Dartmouth service station for over 20 years, will be devastating to lose such a good honest garage and object to planning for high rise flats **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS	3	Noted. The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		6. Please provide your comments on the site allocation(s) selected above. Would mean the permanent closure of local businesses including the garage we have used for years. Great people providing an amazing service to local people. The council should be supporting businesses not forcing them to close down. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		protections for the MOT centre and the amenity of the neighbouring public house.	
3	LWA	**1. Do you have any comments on the proposed vision?** Great to have a vision...when it doesn't have a bias. **2. Do you have any comments on the proposed key objectives?** No **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** It's one thing to relocate, by force, a business that relies on satellite clients but quite another when you destroy a business that the community relies on. The loss of the Dartmouth Road garage (to name but one business) will be an irreplaceable loss to those with vehicles within a mile of its location. This industry is built on trust. One which you propose to eradicate. It is built on faith and reliability. One which you propose to eradicate. There are few enough businesses that can be trusted with your wallet and this garage is one of them. In the desire for residential buildings, you are forgetting that a community needs businesses too. Or do you intend on increasing the, already substantial, work, business and industry flight out of the Borough? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Knock down the huge bail hostel in the former Sydenham police station and fill your boots there. And then, why not build in the council offices car park behind your building along with the Truck park? Better still, one day there will be no space left; put in place a solid relocation process that might help other communities and relieve your apparent burden.	3	Noted. The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** yes. It is biased and flawed and is written with promises for the future whilst the borough has not sufficiently funded the present (or the recent past). Communities are not extra blocks of housing- communities are the integration and wellbeing of those that have made an area their home and participate in the attempt of making theirs and others homes and areas a better place to live. The report is written	4	We do not agree with your assessment of the plan. The Local Plan sets out a positive strategy for managing future growth and development across the borough, having regard to the Good Growth policies set out in the London Plan and the principles of sustainable	Loxley Close and Sydenham Road site allocation boundary amended to exclude building containing Bishop's Furniture Store.

		without soul or feeling and is simply an exercise in generating money through development in one of London's most overcrowded boroughs. **2. Do you have any comments on the proposed key objectives?** Yes. we live in an overcrowded City and borough, generating more housing adds to the demand and strain on the infrastructure. Anyone who lives local (se26) to my shop will know of the overcrowded schools, train platforms, traffic congestion and the daily strain our brilliant nhs (local gps) have every day. If there has been insufficient funding by this borough for years then why would it change with the promise of new housing, extra residents and extra pressure? The key objectives are flawed because the Local Authority promises for the future without anything being done for the present. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Land at Sydenham Rd and Loxley Close **6. Please provide your comments on the site allocation(s) selected above.** I happen to own a business that would be affected/possibly demolished to cater for this plan. I find it incredibly offensive and unprofessional that the proposals state that Landowners were consulted and that our (mine and lidl's) buildings 'do not make a positive contribution to the character of the landscape'. As the owner of this building I was (and neither were my neighbouring properties) contacted before these draft plans made. It is a simple courtesy to talk to stakeholders before throwing their businesses future into the public domain and to then make unfounded crass comments about 'character of the landscape' is nothing but shameful and indicative of an agenda to push plans through. I will tell you what community is...it is when you own a business and say hello to the same people every morning as they pass even if you do not know their name and yet you are happy to see each other. It is when many customers become friends and pop in because you know you value them for more than just their custom. It is when your disabled father can visit you on his mobility scooter because you made the effort 20 years ago to buy a building near to him so that you can support your elderly parents. Communities are when every person do their best for themselves and other to better the places that they live in. If I lose my shop to these soul-less plans then I don't lose a building...I lose my friends, my daily contact with my parents, the opportunity for my dad to still have purpose in life, the opportunity to keep Sydenham thriving by selling something that is different and diverse. Sydenham would also lose one of its last key retail units - see below. **7. Are there any other issues and/or approaches for the area that you feel should be considered?**		development set out in Government's National Planning Policy Framework. Like all London Boroughs Lewisham is trying to tackle a housing crises and are directed by the London Plan to plan positively to meet its housing targets of 1,667 homes per annum. With regard to site allocation – Land at Sydenham Rd and Loxley Close the London Plan directs Local Authorities to allocate surface car parks and single storey retail for redevelopment to make best use of available land.	

		Yes. Please also consider that the Lidl retail unit is the biggest on the high street before you have to visit the Bell green industrial estate. People and communities need affordable and local food/shopping and not everyone can drive or manage large amounts of shopping on a bus. Whilst the 'local' Tesco and sainsbury's serve a purpose, they are limited by space and charge more for the convenience. The Lidl building retail, therefore, is very important and it is one of the last large retail units that can provide a proper supermarket at this end of Sydenham. The car park at the rear of this building was, for years, free and served to help all the local area for footfall and parking for staff that travelled to the area. Now that it requires payment and to register the car (for free two hours before payment) the car park is often empty and barely used which has caused terrible parking problems for residents in the surrounding areas. Whilst this may serve as an area suitable for development, it would surely better suit and serve the community, shops and surrounding residential areas by changing the parking strategy that has obviously failed since it was introduced.			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Dartmouth Car Garage has been part of the local area for many many years...bringing customers from all over Kent/London and I have been one of their loyal customers for a very long time. I go to this garage as they are trustworthy, thorough and unlike a lot of garages do not rip you off!! My daughter has Cerebral Palsy so going somewhere I can entrust to do a good/thorough job is paramount!! I need to ensure my car is safe/reliable to get my daughter to her many appointments, school etc. and the people who own/run/work at Dartmouth Garage are the only ones I trust my car with. Not only do a fantastic job at a reasonable price, when they give me a timeframe they stick to it...even if it means going out of their way. The service, trustworthiness and thoroughness is priceless. The very valid reasons above are why this local institution (also bringing additional revenue to the area), Dartmouth Garage, should not be closed and should be excluded from the proposals	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		7. Are there any other issues and/or approaches for the area that you feel should be considered? N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** The vision for West area is encouraging but the amount of new housing must not just all be flats, and must be sympathetically designed to fit into the victorian feel of the high street and surrounding streets. Endless amounts of small flats does not encourage families to move to the area, as there is no space for them, and so you end up with an imbalance of residents. If flats are inhabited by families then the parks will need to be upgraded to support them in their need for outdoor space. Better facilities in the green space is a knock on effect of lots of flats with no gardens. **2. Do you have any comments on the proposed key objectives?** transforming parts of the South Circular into healthy streets will be interesting to see. I do not see how you can improve any elements of that road unless you remove the lorries during school hours. The pollution alone is significant and I would stop all lorries using the road between 7am and 10am and 3pm to 6pm so that you encourage families to cycle or walk to school, which is not safe at this time. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** I am encouraged to see the principles around keeping the village feel as much as you can for each area, and that is something quite unique to the south london 'town's that you don't see in other parts of London as much. Connecting the HUBs where existing transport isn't there, is important so that we move seamlessly across Lewisham to various other hubs that will encourage more independent businesses to flourish. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** 74-78 Sydenham Rd 113 -157 Sydenham Rd 154-160 Sydenham Rd **6. Please provide your comments on the site allocation(s) selected above.** As mentioned before, the planning must not just be about maximum flats in space provided with some disconnected shops options at the bottom that eventually get turned into a flat as no one takes up the shop. Traffic in the area, parking and increased pollution must be factored into the design and plans of any building and not be pressurised by developers to pack in lots of small pokey family-unfriendly spaces that then don't foster the community feel in the right way. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** There is no mention of the parks being upgraded to support additional residents. Also plans encouraging footfall to either end of sydenham should be considered. Lots of Lower sydenham shops are not used or filled because it's a bit far from the	1		

		top of the high street and nothing really down there to encourage people to walk. Bistros or Bars, Delis need to be encouraged down the road so that people use all the shops. Less charity shops and nail bars and more of a mix of usage. The shop fronts next to the Dolphin are tired and do not encourage people to come down the road. Only the Dolphin and Raffaele restaurants get people this end. So more thought about connecting main high street to the lower end would be good.			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** There are businesses here that have been here for decades, this is people's lives. The garage should not be closed, it's been there decades, it's a family run garage, they go above and beyond to help customers, employ local people, and the community rely on them and should be excluded from the plans. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Noted. The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.**	3	Noted. The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		In the Lewisham Local Plan West Area summary document you state for area 5 (Willow Way) that your vision is to:- Deliver the renewal of industrial land at Willow Way to better complement the centre with new workspace and a wider mix of uses. If this redevelopment were to take place it would require the destruction of many well-established businesses namely: - Blue Tiger Coffee Anerley Car Crash Repairs Delta Motors Hallmark Catering Hire Dartmouth Service Station Foreshaw Building Services Cuddly Bear Day Care Services On & Off Stage Supplies Beeline Services. How much more of a wider mix of businesses does this redevelopment hope to achieve? From the lamppost notice section 18.52 Development guidelines you state: - This will require careful consideration of the operational requirements of existing and potential future employment uses. I cannot see how this development will improve the potential future employment of the area. All this will do is take away the livelihoods of the people who are currently employed by these existing and well-respected companies. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** I can see that the landowners will be financially compensated regarding this redevelopment however, the large number of employees working with the businesses will be left without employment and looking for work in an exceedingly difficult period following a global pandemic.		The draft Local Plan does not include any details or proposals around the compulsory purchase of specific land or sites.	
3	LWA	**1. Do you have any comments on the proposed vision?** I'm very sad that the council are trying to take a long term family business that is always busy helping the people in the community with a service and putting yet an other concrete high rise in its place !!!! **2. Do you have any comments on the proposed key objectives?** I've used this garage for many years and always look forwards to an honest value for money service. It would be a shame to see it replaced by yet another high rise block there's no space as it is in the area . **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA1: West Area place principles	3	Noted. The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		4. Please provide your comments on the topic(s) selected above? Yes leave it alone peoples businesses are on the line and it's not like a nail bar a lot of hard work goes in to helping the public in this area **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow way LSIS 6. **Please provide your comments on the site allocation(s) selected above**. Leave it as it is we need descent businesses in this area **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Think of the businesses you are putting out of work		these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Been a customer of dartmouth service station for over 20 years and object to the proposal to build flats there **7. Are there any other issues and/or approaches for the area that you feel should be considered?** The area is already over populated and there theres not enough schools and gps and services to accommodate more residents	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?**	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Have always used the dartmouth garage for many years and I wish to object to the plans to build flats there **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow way LSIS **6. Please provide your comments on the site allocation(s) selected above.** The proposed development on willow way will increase local housing exponentially and put too much pressure on amenities including doctors and schools - particularly with the develop of the nearby police station and Mais house. The height of the proposed development is way out of character with the local surroundings. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	1	The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure. The draft Local Plan site allocation proposed for Willow Way LSIS sets out land-use principles and development guidelines. It does not set out specifics around the height of buildings on this site, as this will be established at the planning application stage. Part 2 of the Local Plan on High Quality Design includes policies on managing building heights which will need to be considered alongside the site allocation.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below Willow way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I've been using Dartmouth service station for over 20 years and object to lewisham council plans to occupy this site and build high rise flats **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** This site includes Dartmouth Service Station which is NOT a petrol filling station, but a very necessary and well used Garage for the servicing and repair of motor vehicles. It is also a MOT Testing Centre. There is nothing comparable anywhere near. As the Garage is located on the very edge of the proposed boundary could it please be saved by moving the boundary just to the other side of this site? Thank you. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** The garage is an independent, family run business, and provides a vital service for people in the local area, and further afield. Car garages/mechanics should remains in the community, and should not be pushed out of the area. The fact that they are always busy, shows how much they are needed. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** This proposal involves demolishing a local garage, a thriving local business employing local people and will be of detriment to them as they lose their jobs in a struggling economy and also the community who use the garage as a trusted mechanics. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** One selected	2	Noted. The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		4. Please provide your comments on the topic(s) selected above? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow way LSIS **6. Please provide your comments on the site allocation(s) selected above.** This development will result in local successful businesses being destroyed. This should not go ahead. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS 6. **Please provide your comments on the site allocation(s) selected above**. Dartmouth Service Station is not just a symbol, but, also, it's such a big part of what this area is, it's a big big part of the community and it would be very sad to see it go. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** Do not ruin existing businesses **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A	2	The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Please do not close down Dartmouth Service Station - we have been customers of theirs for 25 years and they are a proud and highly valued part of the Forest Hill, Sydenham and Catford community. If you have to build flats, please build them on vacant land of which there is plenty. To consider destroying people's successful businesses at a time like this is frankly disgraceful. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Too great an effect on my life and view from my flat across the stree **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Lose of the parking	0	Noted. The draft Local Plan includes a refreshed suite of policies addressing amenity, which are primarily set out in Part 2 in the High Quality Design section. The site allocation sets out land use principles and development guidelines. Amenity impacts on neighbouring properties will be considered at the planning application stage and through the design-led approach, should any development proposal come forward. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies. Parking provision will need to be carefully managed, having regard to the London Plan parking standards.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** What about people's livelihoods? I travel miles to attend the mechanics you intend to rip down, these plans have been drawn up with no consideration or thought. It's taken me decades to find a garage I trust, this would be a nightmare for all of the staff leaving them without an income. The garage should be left out of the plans. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** Yes **2. Do you have any comments on the proposed key objectives?** it is nice for the council to have a vision but not at the cost of other peoples lives. no one should play god and decide on a persons future without asking or consutling them first. this is a compete disgrace in the way matters have been conducted as a community we cannot keep building estates that continue to overpopulate already densely populated areas. london as a whole is too crowded and here we are trying to squeeze more people in. please don't use the term 'affordable housing' as the only people that benefit are the developers and councils pockets **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA1: West Area place principles **4. Please provide your comments on the topic(s) selected above?** far too many estates already exist in this densely populated area that has a poor infrastructure with low availability on school paces and gps **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Land at Sydenham Rd and Loxley Close **6. Please provide your comments on the site allocation(s) selected above.** loxely close/ sydenham road I have recently been made aware of the 'Lewisham local plan'. I am incredibly concerned as my business falls in the outlined area for the loxely close/sydenham road proposed development. I have no letter or correspondence either asking for permission or consent in this matter. Having witnessed the futility of campaigning against a lewisham consultation in the past over the closure of a special needs school, I really know first hand that these 'consultations' are merely PR exercises whilst the machine rolls on and decisions already made . I hope I am wrong this time but doubt it.	5	The Local Plan sets out a positive strategy for managing future growth and development across the borough, having regard to the Good Growth policies set out in the London Plan and the principles of sustainable development set out in Government's National Planning Policy Framework. The plan process has followed the NPPF guidance and all consultation has been carried out in accordance with our Statement of community Involvement. Like all London Boroughs Lewisham is trying to tackle a housing crises and are directed by the London Plan to plan positively to meet its housing targets of 1,667 homes per annum. Like all London Boroughs Lewisham is trying to tackle a housing crises and are directed by the London Plan to plan positively to meet its housing targets of 1,667 homes per annum. With regard to site allocation – Land at Sydenham Rd and Loxley Close the London Plan directs Local Authorities to allocate surface car parks and single storey retail for redevelopment to make best use of available land.	Loxley Close and Sydenham Road site allocation boundary amended to exclude building containing Bishop's Furniture Store.

		This development would be near at least 10 existing multiple-tower block estates that already exist in an area where infrastructure is at breaking point. School places are insufficient to demand and any local person would vouch for the difficulty in gaining access to their local GP. I also note their there is another earmarked on the corner of sydenham road and mayow road- immediately next to another estate. This two plans border on the ridiculous for their approval and locations in an area that is already overcrowded and underfunded by help from the local council. On a personal note (and i cannot find this in the literature/guides available), what happens if a development is passed and the owner of a building does not want to sell/particiapte etc or how would they be compensated? I am at an age now where I do not want to retire but do not want the upheaval of relocating to find another customer base after having made so many customers/friends in my 20 years of trading at this address. I do not wish to see my shop knocked down and replaced with a more modern property with exactly the same amount of housing that my site provides just to fill a developers pockets. also, lidl is the only supermarket at this end of sydenham that provides accessible and affordable food to the local population and you wish to knock it down to provide housing??? really ??? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** yes why not simply ask the owners of the land if they have an opinion before deciding to include their life's work in a public consultation			
3	LWA	**1. Do you have any comments on the proposed vision?** Poor behaviour from Lewisham council - See comments below **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Local businesses that have built up a reputation of long standing quality have not even been considered or consulted on the proposal. Potentially making people unemployed to increase the concrete jungle that is destroying Forest Hill / Sydenham.	0	The public consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement. The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses.	No change.

		7. Are there any other issues and/or approaches for the area that you feel should be considered? N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Been using this garage for years for mot and services and cannot believe that the idea of removing this is even thinkable- surely they can build somehwhere else/ peoples jobs don't seem to mean anything in this case !!! **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** Distorting small business **2. Do you have any comments on the proposed key objectives?** Yeah build somewhere else **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** This will be housing for more people on benefits! This is a joke!! **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I use this garage and have done for years and they are the only people I trust! **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. The Local Plan sets out a strategic target for 50% of all new homes to be genuinely affordable. This target is based on evidence of need, as set out in the Lewisham Strategic Housing Market Assessment.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None Selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** Absolutely ridiculous. Dartmouth service stn has been a fantastic business for many years. I've been using them for as long as I can remember. Must be 30 yrs. All my family use them. Those guys are as honest as the days long. To build on that plot would effect a whole community. You must rethink your proposed development. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** If you go ahead with the proposed plan of building yet another eyesore of a concrete block of flats please spare a thought for the long and I mean long standing businesses that this affects. Dartmouth service station has been around since I was a kid! My family along with hundreds of others have been using this service station for 30 years! It's a thriving business which is always booked up, because that's how popular they are. You are willing to just squash these businesses for flats. Please spare a thought for the lively hoods of the people who work here and for the	3	The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. The draft Local Plan Part 2 section on Sustainable Design and Infrastructure includes a new policy on the 'circular economy'. This sets out approaches to prioritise the re-use and recycling of materials (over disposal) to support sustainable design and construction.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		services they offer to the public. [name redacted], who is attached to the back of the Dartmouth services has fixed my family cars for years too. A body shop which is highly recommended and used by many. You are not only taking peoples livelihoods away but you are depriving the community, near and far of a spectacular garage and body shop. They bring a lot of business into the area which then helps the other amenities; coffee shops, tesco, food chains, newsagents. Me and my family are 1 million percent against this proposal. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** The environmental impact of construction contributes to global warming. Construction projects emit large amounts of carbon dioxide and methane. Infrastructure developments cause pollution and produce waste. As the output of the construction industry multiplies, so can its damaging effects. Please think of all the factors.			
3	LWA	**1. Do you have any comments on the proposed vision?** This will ruin a really reliable local business and amenities **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None Selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Dartmouth service station Dartmouth Rd **6. Please provide your comments on the site allocation(s) selected above.** This would ruin a really reliable local business **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** It will ruin local amenities and community **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A	1	Noted. The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses.	No change.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** You are forcing a family-run garage that has been in the community for years to close. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		6. Please provide your comments on the site allocation(s) selected above. To lose such a well run and trustworthy garage would be awful. They have been part of the community for many years, providing peace of mind and essential services. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** Blood clart waste of money 2. **Do you have any comments on the proposed key objectives**? N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Noted.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA3: Forest Hill district centre **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** The garage has been there for as long as I can remember and provides a service to the local community. No other mot station near by.	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		7. Are there any other issues and/or approaches for the area that you feel should be considered? N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** You say supporting the local neighborhood,how is it by tearing down one of the last remaining family pubs and a local friendly garage ..seems very hypocritical **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. The Council recognises the important role that public houses play in the local economy and Lewisham's distinctiveness. Therefore, the draft Local Plan Policy EC7 (Public houses) sets out a new 'presumption in the favour of the retention of public houses'. This will help to ensure that any future proposals for redevelopment of land within the Willow Way LSIS site fully consider the pub and its amenity through the masterplan and design-led process. However it is acknowledged that the site allocation policy could be amended to provide more clarity on the need to protect the public house and its amenity.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. Willow Way LSIS site allocation amended to include new development guidelines around protecting the character and amenity of the pub.
3	LWA	**1. Do you have any comments on the proposed vision?** THIS WILL CAUSE OVER CROWDING OF AN ALREADY OVER POPULATED AREA AND MORE SHOPS WILL JUST STAND EMPTY **2. Do you have any comments on the proposed key objectives?** NO GOOD WILL COME OF THIS DEVELOPMENT **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA1: West Area Place principles **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I HAVE BEEN USING DARTMOUTH SERVICE STATION FOR OVER 20 YEARS THE SERVICE THEY PROVIDE IS OUTSTANDING NOT JUST TO ME BUT TO ALL THEIR CUSTOMERS AND THE COMMUNITY A GREAT OLD FASHION SERVICE WOULD BE LOST.	4	Noted. The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		SMALL INDEPENDENT BUSINESSES SHOULD BE ENCOURAGED NOT FORCED OUT OF BUSINESS DO NOT CLOSE THIS GARAGE FOR EVERYBODY'S WELL BEING **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I have used the garage for years - it is an absolutely fantastic business and a real part of the community. The team there are trusted by their many long term customers and I for one would not wish to take my car anywhere else and would hate to see it demolished. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.**	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		My family and friends use the garage in Dartmouth Road on a regular basis and I would be sad but disappointed if this would go as this has been there for maybe 40yrs or longer **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Dartmouth service station has been there my whole life and employs local people that I trust. There are to many new soulless new builds in forest hill we don't need anymore round here. You are going to destroy all the Victorian character. Where will the business go if you flatten it and redevelop? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	3	Noted. The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS 6. **Please provide your comments on the site allocation(s) selected above**.	3	Noted. The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		I object heavily to the current proposal to knock down the local businesses which have been long standing pilars of the community. I have used the Car Garage for over a decade even though moved from the area. The businesses are long standing and trusted by the local people and would be awful losing them. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** It's about time local councils start to look after the people and businesses that are already within the proposed area. There is certain businesses that I use and generations of family has used I.e a car garage that are seriously becoming few and far especially this one that has proved to be honest and fair to all customers. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	3	Noted. The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS	1	Noted. The Regulation 18 stage public consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement.	No change.

		6. Please provide your comments on the site allocation(s) selected above. I think the Council needs to be less underhanded in the way it is going about things and have proper consultations with the business owners. Small businesses and the jobs they provide are the key to the success of any development plan surely? Don't throw the baby out with the bath water!!! **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	Noted.	No change.
3	LWA	**1. Do you have any comments on the proposed vision?** I think you need to look at other failed mass urban development in local history Deptford Bermondsey old kent road elephant and castle. All perfectly functional communities deemed unworthy and replaced with concrete jungles that breed antisocial behaviour crime and mental health issues. Over development with no where people want to live small cramped flats and houses replacing family homes with soulless boxes. **2. Do you have any comments on the proposed key objectives?** Mass urban development is driven by targets and money with no regard the needs wants and local community. If the area is consulted you take a statement from a young generation that think a skate park is what they need and will save the community. People need areas to get out and use as they want ie local parks many of which were donated by the Victorians now these areas would be mass development. Look at history to see where a community grows. Not a bank balance or target sheet.	2	The National Planning Policy Framework requires that Local Plans must set a positive framework for managing growth and development to meet identified local needs. The Council has prepared evidence base documents which set out future needs for new homes, workspace and jobs, community facilities and supporting infrastructure. In addition, the London Plan sets out a housing target for Lewisham which the Council must seek to address through the Local Plan. Whilst acknowledging the challenge of accommodating growth, the Local Plan sets out a framework to help manage this in a sustainable way, in a manner that respects the distinctive qualities of Lewisham's neighbourhoods and provides a clear strategy for future investment within them.	No change.

		The local car garage for example is more needed then a artisan cafe that sells 50 versions of milk to a community. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA3: Forest Hill district centre **4. Please provide your comments on the topic(s) selected above?** Local shops can't survive as rates are too high address this rather then pulling out the soul and replacing with boxes **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Blatantly a land grab the area has been suffering from the last badly thought out schemes the council was involved in. The infrastructure cant cope with any more badly thought out schemes. These proposals are drawn up by people who have no local knowledge or real life experience and have designed a utopia that looks great but in functionality will be inept and further destroy the local community. We all know the industrial areas will be small over priced and unfit to run a business. Small firms are struggling as it is and its expected a number of small businesses to stay profitable while you knock down their premises and wait while the proven inadequate scheme builds them a new base to operate from. These grand schemes are proven to be unsuccessful. Look at past history in Deptford, old kent road, Bermondsey and The Elephant and castle! Perfectly functioning local communities deemed unfit for purpose by local know all know nothings that are replaced with soulless developments that isolate, separate and encourage crime and gang mentality. Shiny slums that dont offer a real home people want to live just boxes to exist. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** The Tesco and other flat developments have left the local areas over populated and contributed to a local crime increase with the undesirable inhabitants the council have installed how can you be trusted with an even bigger area to ruin. Local areas are best left to local people to develop and utilised by the community to build or install business they require. Not mass urban development driven by targets and money serving others not the local community		The Local Plan is being prepared through several rounds of formal public consultation and additional engagement with local communities and other key stakeholders, in line with the Council's adopted Statement of Community Involvement. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure.	
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A	2	Noted. The draft site allocation for Willow Way LSIS provides for employment-led, mixed-use redevelopment of the site. The policy will help to enable vacant and underused land on parts of the site to be brought back into beneficial use, including the provision of new workspace, homes and public realm improvements. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses.	No change.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** This land should remain! It provides much needed employment and service to the local community. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		The draft Local Plan proposes to continue to safeguard this site for commercial and industrial uses with a Locally Significant Industrial Site designation.	
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I have been using Dartmouth service station ever since I passed my driving test almost 30 years ago. It is an amazing family run business and I wouldn't want to go anywhere else. It is an absurd idea to want to knock it down and build more residential flats in an ready over populated town. I strongly oppose any redevelopment which would mean Dartmouth would have to close **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A	2	Noted. The draft site allocation for Willow Way LSIS seeks to address some of the existing issues around safety, movement and poor quality public realm in the Willow Way / Upper Kirkdale area. It sets out that any future redevelopment must be delivered through a masterplan, which will help to ensure these matters are considered in the round rather than on a site-by-site basis. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Access onto Willow way from Kirkdale has become very dangerous with content parking on double yellow lines in front of Tesco. Willow way is filthy and fly tipping has become an issue that the council is not able to cope with. Willow way was previously a very clean road with light traffic but since the building of so many flats and Tesco in and around the locality the area has deteriorated. Our concern is that council, despite best efforts, do not seem able to manage the recent development of this area at present (i.e. rubbish & traffic offences) so we fear that this situation will become even worse with more people crammed into the area without proper attention given to resolve the existing issues. The existing Garage 'Dartmouth Motors' is a a useful local service and I am also concerned that they will be forced to move out but hope the garage can be accommodated in the plans. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I have used Dartmouth garage for years and will find it hard to find anything as good close by. It will be a great loss for the area. It is not just the building but the people who work there make this service irriplaceable. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** The garage is an important part of the community as is the open spaces. Wildlife need these spaces to flourish. Trees, plants and shrubs are also needed to cut down air pollution something which is high in Lewisham and built up areas due to the extreme amount of traffic which will only be added to with the building of more homes. More people = more cars! **7. Are there any other issues and/or approaches for the area that you feel should be considered?** I feel that the underhanded way in which the council has conducted itself in this matter is disgusting. People have a right to be notified about what is a possible in their area and must have a say early in the process not as an after thought! Especially the land / property owners!!	2	Noted. The Regulation 18 stage public consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. The draft Local Plan Part 2 section on Green Infrastructure sets out the strategic approach to protecting and enhancing green/open spaces, along with requirements for urban greening. It is acknowledged that this can have multifunctional benefits, including for improving air quality and supporting biodiversity. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Former Sydenham Police Station Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.**	3	Noted. The Regulation 18 stage public consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement. Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. The draft Local Plan part 2 policies on Heritage set out the Council's approach to conserving and enhancing the significance of heritage assets. These policies must be considered alongside the site allocations.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		The garage situated in this area has been used by members of my family for many years. They always give efficient , courteous and honest service with very fair pricing. I'm surprised that more prominent notice of development wasn't shown in the area-rather sneaky don't you think? As for housing and more jobs what's wrong with the original historic buildings they shouldn't be replaced with more high rise plastic boxes. Don't knock down the areas history please!Where do the **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Where do the employees from the garage go for future employment...Where's another local garage that gives such good service and treats their customers with such respect? Don't do this redevelopment PLEASE!			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I feel that this is a ridiculous plan The garage is a life line to so many including myself Also the local infrastructure will not be able to accommodate even more property There's the girls school opposite so would only entice the wrong sort of resident and the extra residents will endanger the children travelling too and from the school The extension of the lez later this year will also impact the area massively **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house. The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure The ULEZ is outside the scope of the Local Plan. The Council will continue to lobby the Mayor of London and Transport for London to extent the ULEZ beyond the South Circular.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		4. Please provide your comments on the topic(s) selected above? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** This a family run garage that has served the community for many years and should remain as they have many customers who have been with them as well. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Where are all children from the accommodation going to go to school and also the overcrowded roads around there already		The Council has prepared an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the different types of infrastructure, including social infrastructure/community facilities, required to support the levels of growth planned. The IDP has informed the preparation of the Local Plan, and some site allocation policies include requirements for the provision of specific types of infrastructure	
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** The Garage has been in the local area for years. It's a trusted garage that everyone relies on and should be excluded from the proposal. The Garage employee local people & has been there for decades **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		4. Please provide your comments on the topic(s) selected above? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** Building on the land where Dartmouth service station would be foolish. Not only would it put people out of work, it would also take away a local business for the local people who have been going there for years. They run a very good and helpful business and it would be a loss to the local community if it had to close down. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** Disgraceful putting small family business out of work **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Dartmouth motor been there for years family run business brilliant garage **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?**	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I've been using Dartmouth service station for years. An institution of the area and important part of the community. Outrageous to think it will be knocked down to be replaced by another high rise tower block. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I think it is an absolute disgrace that the council can do as they want never mi **7. Are there any other issues and/or approaches for the area that you feel should be considered?** I think it is an absolute disgrace that yhe Council can do as the please never mind the consequences, to close down the garage which is a WELL established business and is well established into the community just so others can get there way is outrageous and SHOULD NOT BE ALLOWED.	0	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** I would be really annoyed if Dartmouth Service station has to close as they are the only local garage who are honest and reliable! **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		4. Please provide your comments on the topic(s) selected above? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected 6. **Please provide your comments on the site allocation(s) selected above**. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Me and my whole family have been using Dartmouth service station for over 20 years and don't agree with the proposed plans to knock this long standing family business down and replace with flats. Thousands of people use this service station and it is highly recommended to people. The closure of this service station would impact the whole community and people from further afield. You would be putting a family out of business and customers will have to find another garage and build that rapport. Please reconsider you plans **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		4. Please provide your comments on the topic(s) selected above? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I fully object to Dartmouth Service Station being part of this development on Willow Way. I cannot stress enough how strongly I am against the garage being knocked down & the land developed into more nonsense high rise flats in the local area. Dartmouth Service Station has been part of the local community for years providing outstanding levels of service to its customers. They are a family run business who always go the extra mile for you and quite frankly I would not want to go anywhere else for my motoring needs, it is incomprehensible to imagine them not being there. You should go find somewhere else for your development not here. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I massively object to this decision. It's a family run garage that has been there for decades. The guys go above and beyond to help, employ local people. The community rely on them and have been using this garage for years. It would be a real shame to see this garage be demolished and I feel strongly against this proposal. I hope the council make the right decision and stop this from happening. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

3	LWA	**1. Do you have any comments on the proposed vision?** I object to Dartmouth Service Station being part of this development on Willow Way. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** Dartmouth Service Station has been part of the local community for decades providing outstanding levels of service to its customers. They are a family run business who always go the extra mile for you and quite frankly I would not want to go anywhere else for my motoring needs, it is incomprehensible to imagine them not being there. I cannot stress enough how strongly I am against the garage being knocked down and the land developed into yet more high rise flats. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	3	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
3	LWA	**1. Do you have any comments on the proposed vision?** I object to Dartmouth Service Station and its land being included in these proposals **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** I have worked at Dartmouth Service Station my entire working career since I was 16 years old, it is all I know. The first I hear about these developments for the Willow Way LSIS is from a sign on a lamppost. I am now worried for me and my family as this is my livelihood. The garage has stood on these premises for decades and has	8	Following the Regulation 18 consultation the Council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.	The site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.

		built up a strong community of customers, the vast majority have always said they will not go anywhere else, we are our own community not just somebodys mechanics. We are a trusted and vital part of this local community being there for our customers through good times and bad. Being here since I was 16 has also meant I have built up my own personal customer portfolio, they specifically come here and ask for me, if I wasnt here they would go elsewhere taking their custom with them. Furthermore, the owner of the premises has not been informed of the plans, the first he saw about it was from the signs on the lampposts. Lewisham say that landowner engagement has been undertaken but they clearly missed out the landowner of one of our sites in the new proposal. It says it wants to create jobs but it is effectively putting people out of one. Everyone here is now stressed and concerned, taking that stress home to our families. Times are stressful enough just keeping ourselves and our families safe without having this extra worry put on us. I strongly oppose these plans going up as far as Dartmouth Service Station and the immediate surrounding land **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
3	LWA	**1. Do you have any comments on the proposed vision?** I am a shop owner of which my property is included in a proposed identified redevelopment . This has been purposely kept under the radar and when I found the proposals by complete accident I immediately contacted the local authority. I was told not to worry and by NO circumstances would future compulsory purchases be made and that these proposals were just trying to identify available areas. Well here we are a year later and in the middle of a covid crisis where my business is crippled and now there are meetings about my property that I have not been invited to. lewisham council... you should feel very ashamed. **2. Do you have any comments on the proposed key objectives?** yes. this is simply the local council trying to over develop an area at bursting point. you simply cannot keep adding housing to invrease area population without the infrastructure of amenities to back it up. Lewisham are trying to cash in on areas that will increase in value should the bakerloo line ever happen. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below**	1	Noted	Loxley Close and Sydenham Road site allocation boundary amended to exclude building containing Bishop's Furniture Store.

		Land at Sydenham Rd and Loxley Close **6. Please provide your comments on the site allocation(s) selected above.** this would simply overcrowd an area already saturated by housing blocks in an area which cannot cope with sub standard amenities such as overcrowded schools and gps **7. Are there any other issues and/or approaches for the area that you feel should be considered?** yes. try asking the people who actually own the land if they want to sell before deciding to include it in a plan. Would that not be the politest way of dealing with the matter? not even a letter in the post??? lewisham- be ashamed			

		3	LWA	**1. Do you have any comments on the proposed vision?** Yes - the potential for some of the shops in area 3 and the Dolphin need to be left as they are. The Dolphin has been there for 100s of years. **2. Do you have any comments on the proposed key objectives?** Not in theory **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** 113-157 Sydenham Rd 154 – 160 Sydenham Rd 74-78 Sydenham Rd **6. Please provide your comments on the site allocation(s) selected above.** We should not be looking to redevelop a thriving local pub and other businesses. Maybe to build around them. The Audi car showroom is good for the area as it gives the impression that this is a more affluent area (than it actually is). **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Please look into the heritage of the Dolphin pub. Often described as one of the best beer gardens in London. And a real local hub	1	Noted. The draft site allocations referred will provide for the mixed-use redevelopment. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses. The proposed site allocation for 113-157 Sydenham Road addresses the Dolphin public house in the development guidelines. It states that the pub must be retained and that development must conserve and enhance its historic significance. It also states development must not adversely impact on the character and amenity of the locally listed public house.	No change.
		3	LWA	**1. Do you have any comments on the proposed vision?** As a resident, I am very enthusiastic about Lewisham's vision to increase our housing stock by means of densification on small and medium plots. We are suffering a dire housing shortage, affecting not only the very poorest in society, but also young workers starting out, and young families who cannot find the larger homes they need. The answer to this is to provide abundant housing, of all kinds: from studio flats to family homes, but social rent and private ownership. We cannot allow established property owners to issue a veto over the needs of other borough residents on obtuse grounds; the only way to tackle the housing crisis is to increase supply of all kind. The best way to do this is by filling-in car parks and industrial sites within our neighbourhoods. **2. Do you have any comments on the proposed key objectives?**	0	Support for vision and site allocations noted. The draft Local Plan sets out proposals around the development of small housing sites. This will help the Council to meet the borough's London Plan target for small sites, which forms a component of the borough housing target. The Council has adopted a Small Sites Supplementary Planning Document which will support the Local Plan.	No change.

				N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** 113-157 Sydenham Rd 154 – 160 Sydenham Rd 74-78 Sydenham Rd Land at Sydenham Rd and Loxley Close Former Sydenham Police Station **6. Please provide your comments on the site allocation(s) selected above.** These are all good choices for development. In particular, the land at 113-157 and 74-78 Sydenham Road are ripe for development. The original intention of the Victorian designers of the high street were for shops below, with 3-5 storeys of housing above, served by bus and train routes. These sites deviate from that vision: car showrooms, car washes and one-storey buildings are clearly inappropriate in a high street. They should be returned to a mixture of housing above and commercial use underneath. Doing so will not only provide the housing we need, but also provide footfall to support our high street and create a lively street scene at all times of day. The claim from the local amenity society that the row of takeaways at 113-157 Sydenham Road must be "saved" as some of our "best businesses" is self-evidently absurd. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
		3	LWA	**1. Do you have any comments on the proposed vision?** There don't seem to be any plans to get rid of Paul Green House, 185 Dartmouth Rd, Forest Hill, London SE26 4RQ Why on earth not? **2. Do you have any comments on the proposed key objectives?** Add Paul Green House, 185 Dartmouth Rd, Forest Hill, London SE26 4RQ to redevelopment plan **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA3: Forest Hill district centre	0	At this point in the plan process we are not considering additional site allocations. This will be considered at a future review stage.	No change.

				4. Please provide your comments on the topic(s) selected above? N/A 5. **Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Willow Way LSIS **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			
		3	LWA	**1. Do you have any comments on the proposed vision?** Really exciting to see such positive changes in the pipeline, particularly pleased to see such focus on public realm in and around Forest Hill station. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA3: Forest Hill district centre **4. Please provide your comments on the topic(s) selected above?** I think the potential to improve public realm and introduce more businesses and workspace to the area is great, these changes will have a positive impact on the vibrancy of the areal and make it nicer and safer to walk around and spend time in. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Land at Forest Hill Station West Land at Forest Hill Station east **6. Please provide your comments on the site allocation(s) selected above.** Improvements to these sites In particular will have a positive impact on Forest Hill town centre **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	0	Support noted.	No change.
		3	LWA	**1. Do you have any comments on the proposed vision?** Concerns about the increase in traffic & parking problems that will ensue from all of the extra residential units and cycling routes that are being proposed. for Sydenham	0	Noted. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and	No change.

				Road. Sydenham Road is already an extremely congested route and often at a standstill. **2. Do you have any comments on the proposed key objectives?** No **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** No **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** 113-157 Sydenham Rd 154-160 Sydenham Rd 74-78 Sydenham Rd Land at Sydenham Rd and Loxley Close **6. Please provide your comments on the site allocation(s) selected above.** Concerns about increased traffic and parking problems as a result of so many extra residential units. Most residential properties in Sydenham have on street parking only. With the advent of the electric car, I am not sure how or where residents will be able to charge their cars. Your design ideas sound wonderful but we only have to look at St Phillip Neri School, Sydenham to see how badly that turned out. There was considerable local opposition to that plan as people felt that the construction was too large and did not fit in with the street scape. The architects went to great pains to "sell" the design of the building assuring opposers that it would be in keeping with the local area **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Are you over developing the Lewisham West area ? We are desperately short of recycling facilities. The instances of people leaving rubbish on the streets are increasing, as is fly tipping and over development could accentuate the problem.		the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies. Parking provision will need to be carefully managed in accordance with the London Plan parking standards, recognising the strategic priority to support modal shift away from private car use. Details on parking provision for electric vehicles are set out in the Local Plan Part 2 section on Transport, Policy TR4 Parking. This sets a minimum requirement for EV charging points where new parking is provided in development. A comparatively small amount of growth and development is planned for the West area, particularly when considering other parts of the Borough, such as the North and Central areas. This is owing to the limited amount of strategic development sites (i.e. site allocations) that have been identified within it, through the Council's housing land availability assessment which has informed the draft Local Plan. Flytipping and rubbish/recycling collection are outside the scope of the Local Plan. These comments will be forwarded to colleagues in the Council's Waste management service.	
		3	LWA	**1. Do you have any comments on the proposed vision?** I would like to know how developing an already saturated area will help improve the dangerous road of Waldram Crescent (A205) and the bend approaching Forest Hill station? **2. Do you have any comments on the proposed key objectives?** More buildings will mean more traffic and more cars pushed onto Waldram Crescent, which is heavily residential, causing pollution and traffic noise to residents.	0	Too detailed for the Local Plan but we will pass your comment on to our Highways team	No change.

				This will increase the traffic load on the approach, where there is no safe pedestrian crossing when a slip road using the existing foot underpass was supposed to be developed to stop the congestion. **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA1: West Area place principles LWA3: Forest Hill district centre **4. Please provide your comments on the topic(s) selected above?** More buildings will mean more traffic and more cars pushed onto Waldram Crescent, which is heavily residential, causing pollution and traffic noise to residents. This will increase the traffic load on the approach, where there is no safe pedestrian crossing when a slip road using the existing foot underpass was supposed to be developed to stop the congestion. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Land at Forest Hill Station west Land at Forest Hill Station east **6. Please provide your comments on the site allocation(s) selected above.** More noise from development, increased traffic due to more housing and more traffic pushed onto A205 which has an extremely dangerous bend approaching Forest Hill station. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** The area is already highly residential and full of new developments. More blocks of flats will mean more population in an already overpopulated area.			
		3	LWA	**1. Do you have any comments on the proposed vision?** The proposals are very 'safe' and lacking in ambition and yet again there doesn't seem to be any clear overall plan plan. Commuter traffic is a problem in all areas and no clear proposals as to how this will be addressed. Ladywell isn't even mentioned in the first paragraph even though it is part of the West area. **2. Do you have any comments on the proposed key objectives?** Ladywell is blighted throughout the day by through traffic which was made worse by road changes on Lewisham High Street and the gyratory at the bottom of Loampit Vale. When are the Council going to sort this out **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected	1	Too detailed for the Local Plan but we will pass your comment on to our Highways team	No change.

				4. Please provide your comments on the topic(s) selected above? N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** Traffic			
		3	LWA	**1. Do you have any comments on the proposed vision?** It seems to have nothing.much to say about Ladywell. In particular, where is the vision for improving the central shopping area of Ladywell? For example, currently the area is blighted by (through) traffic including HGVs. I would like to see a vision that prioritised walking and cycling. **2. Do you have any comments on the proposed key objectives?** I would like to see a vision for developing the shopping area of Ladywell and reducing traffic on Ladywell Road to make it a healthier environment for residents **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA2: connected network of town centres **4. Please provide your comments on the topic(s) selected above?** Ladywell centre should be recognised as a key public centre in the same way as Crofton Park, Brockley Cross and others identified. It is a key focal point for Ladywell and Brockley and efforts should be made to identify and enhance its unique character. This would likely recognise that more needs to be done to stop Ladywell Road being a route for Kent-based commuters and construction lorries. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Noted. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set out clearly in Part 2 Transport policies. The Part 3 West Area place principles include policies which refer Ladywell. In response to consultation feedback, further information on this neighbourhood will be included in the plan.	Local Plan updated to include additional text relating to Ladywell.

		3	LWA	**1. Do you have any comments on the proposed vision?** The plan isn't ambitious enough. The number of cars on our streets is simply shocking. Every residential road in our neighbourhood is packed with parked cars, people should be made to reassess their car usage. In my opinion, only electric cars should be allowed for people who really need a vehicle (work or limited mobility) everyone else should walk, cycle, use transports, use car share. **2. Do you have any comments on the proposed key objectives?** I very much agree with the interchange at Brockley station. It will be a great improvement. Now, the plan says "transform the Brockley Rise / Brockley Road (B218) into 'healthy streets'" that sounds great but the B218 also includes Malpas road and Florence road. Is it an oversight? Will the council finally remove the B-road classification from those two narrow residential roads? Or have they been, yet again, forgotten on the plans? **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** LWA1: West Area place principles **4. Please provide your comments on the topic(s) selected above?** The plan does not mention at all the HGVs problem. About "Locally Significant Industrial Sites" in Endwell Road, it's important to note that this site is surrounded with residential streets. A few of the businesses attract HVGs in the area and that is very problematic! Pollution, noise, vibrations, traffic, oversized vehicles. I believe some type of businesses should be encouraged to move to more appropriate areas. **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** 111-115 Endwell Rd 6 Mantle Rd **6. Please provide your comments on the site allocation(s) selected above.** I very much agree with the development of those sites, they are just an eye sore and make the area look rundown. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A	2	Too detailed for the Local Plan but we will pass your comment on to our Highways team The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set out clearly in Part 2 Transport policies. Details of the Brockley Station Interchange are set out in the infrastructure Delivery Plan (IDP) which is a companion document to the Local Plan. However, it is acknowledged that some additional supporting text can be helpful. Draft Local Plan policy TR5 on Deliveries, Servicing and Construction addresses amenity impacts that are likely to be caused by HGVs. Where appropriate, the draft plan requires that a Delivery and Servicing Plan and/or Construction Logistics Plan is submitted as part of a proposal's Transport Assessment. Endwell Road LSIS site allocation seeks employment-led mixed use redevelopment with compatible commercial, community and residential uses.	Local Plan amended with additional information on the Brockley Station Interchange in supporting text to the West Area place policies.
		3	LWA	1. **Do you have any comments on the proposed vision**? no concrete proposals, just nice-sounding sentiments **2. Do you have any comments on the proposed key objectives?** no concrete proposals, just nice-sounding sentiments	1	Noted. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport	No change.

				3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below None selected **4. Please provide your comments on the topic(s) selected above?** no concrete proposals, just nice-sounding sentiments **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Land at Forest Hill Station east **6. Please provide your comments on the site allocation(s) selected above.** no concrete proposals, just nice-sounding sentiments **7. Are there any other issues and/or approaches for the area that you feel should be considered?** The main issue for Forest Hill is the huge volume of commuter traffic which floods through the area. Unless I missed it, there are no plans to deal with that. Why not consider tunnelling the A205? The documents are full of principles, but no concrete proposals.		modes are central to the Local Plans ambitions and policies and are set our clearly in Part 2 Transport policies. Ideally, the improvement of strategic public transport network together with modal shift policies will help to address commuter traffic. Whilst recognising the South Circular is a TfL road, the Council considers that its use and environment can be improved for those choosing to travel by walking, cycling and of public transport, applying the Healthy Streets approach set out in the London Plan. The Council will continue to work with the Mayor of London/TfL and other stakeholders to deliver improvements along this corridor. As an example, feasibility work for the re-routing of the South Circular at Catford. As the South Circular is a TfL road, any proposals for tunnelling would need to be dealt with by the London Mayor and TfL.	
		3	LWA	**1. Do you have any comments on the proposed vision?** Whilst it is pleasing that the Malham Road industrial site will be protected and enhanced, it is concerning that the plan seeks to redevelop other industrial sites that are currently occupied (Forest Hill Station East, Perry Vale LSIS). The plan should not be seeking to displace existing businesses from sites that are in use. As a local resident, there is a great benefit in having industrial businesses, such as those on all three sites, close by. Similarly the proposal to develop the Jenner Health Centre into residential property is concerning as this will inevitably have a negative impact on the healthcare provision on site. Rather than trying to redevelop sites that are already in use the plan should instead focus on vacant sites **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?**	1	Noted. The draft site allocation for Land at Forest Hill East and Perry Vale LSIS provides for employment-led, mixed-use redevelopment of the sites. The policy proposals do not preclude the retention or re-provision of floorspace or units for existing businesses. The site allocation for Health Centre will enable the facility to be re-provided at the current site as part of a new mixed-use development. Any proposal for off-site re-provision would only be considered where other Local Plan policies on community infrastructure are satisfied. This is considered to be consistent with the London Plan approach for social infrastructure. The policy on masterplans mentions that proposals must address how the	No change.

				N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** Jenner Health Centre Land at Forest Hill Station east Perry Vale LSIS **6. Please provide your comments on the site allocation(s) selected above.** I'm opposed to redevelopment of Jenner Health Centre for anything other than healthcare facilities. Adding residential or other property on the site will only reduce the capacity of the site to provide healthcare. 'Re-provision' of healthcare must ensure that the site remains equipped with the same heathcare facilities, the same area of floorspace for healthcare provision and able to provide at least the same services as currently. It cannot be allowed for any reduction in the capabilities of the site, not for the sites facilities to be relocated away elsewhere. Both Land at Forest Hill Station east and Perry Vale LSIS are currently occupied. The plan should not be seeking to redevelop sites which are currently occupied by businesses as this will disrupt / displace the businesses that are currently using sites, and potentially result in them disappearing from the area. There are enough empty street frontages in Forest Hill that you do not need to be displacing existing businesses to make room for more frontages on Waldram Place and Perry Vale. **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		development sites relate to neighbouring properties and ensure active engagement with the landowners and occupiers of the site.	
		3	LWA	**1. Do you have any comments on the proposed vision?** What happened to Ladywell in the list of neighbourhoods? Did you wriote this in the expectation of convincing the LGBC people of your view that Ladywell should no longer exist? **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected	0	Noted. Ladywell is one of the neighbourhoods included in the draft Local Plan 'West Area'. This is represented graphically on the map at the start of Part 3 (Figure 13.1). However it is acknowledged that paragraph 18.1 at the start of the Part 3 West Area section does not refer to Ladywell. This is an editing error that will be rectified. During the public consultation, the Commonplace webpage included a schedule of online information sessions. This listed neighbourhoods for which 'area-based' events would be taking place. Ladywell was not initially included in the list for the West Area. This editing error was rectified during the consultation after it was called to the attention of Council officers.	Local Plan updated to include additional text for Ladywell.

				6. Please provide your comments on the site allocation(s) selected above. N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		The Part 3 West Area place principles include policies which refer Ladywell. In response to consultation feedback, further information on this neighbourhood will be included in the plan.	
		3	LWA	**1. Do you have any comments on the proposed vision?** Looks Good To me - I'm not sure about all the summary points mentioned but really glad that greater focus will be given to healthy streets on the two main link roads of the South Circular and Brockley Rise/Road. Neither are nice to cycle on now and improvements would be welcome. I think the focus on Upper Sydenham and Forest Hill are also welcome, the former could certainly do with some public realm improvements aroudnt he bridge and it's heavily car-dominated. **2. Do you have any comments on the proposed key objectives?** No **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** No **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** No **7. Are there any other issues and/or approaches for the area that you feel should be considered?** No	0	Support noted.	No change.
		3	LWA	**1. Do you have any comments on the proposed vision?** Would love to have better facilities around stations and making the south circular less of a speeding motorist death trap. I've had to help injured cyclist on various occasions due to bad drivers hitting them around the station/Perry vale junctions of the south circular **2. Do you have any comments on the proposed key objectives?**	0	The Local Plan supports and seeks to promote walking, cycling and the use of public transport through the Healthy Streets Approach (see the Part 2 Transport policies for further details). Part 3 of the Local Plan sets out the Council's objectives to improve the South Circular in accordance with the Healthy Streets Approach.	No change.

				Would welcome healthy alternatives and this would make a massive difference in improving my quality of life as would provide me with better air quality and a safer daily commute **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		The draft Local Plan part 2 policies on public realm set out the Council's objectives and policies for improving the environment around stations. Additional requirements for some stations have been set out in the Part 3 site allocations. The Council has prepared a Local Implementation Plan, which will help give effect to the London Mayor's Transport Strategy. This will be used to help secure investment in public transport including facilities at and around stations.	
		3	LWA	**1. Do you have any comments on the proposed vision?** The vision has some nice words, but is basically void of any ambition. It's a watered-down, lukewarm attempt to placate everyone and offend no-one, but in doing so it is rendered meaningless. What Lewisham needs is a really exciting, ambitious, and meaningful vision which takes into account that the way we human beings live has to radically and fundamentally improve in the immediate future in order to meet the challenge of living sustainably on this planet - the only one we have. Polluting vehicles should be banned. All new building should be zero carbon. No carbon-intensive building material should be used. All new building and refurbishments / rebuilding should result in clean energy sources being used for heat, light and power. You should be encouraging - insisting on - local energy co-ops. Large-scale, polluting, privatised utilities should be banned. All residential streets should have a 5mph speed limit for polluting vehicles, with pedestrians given priority at all times. Trunk roads should have a properly enforced 20mph limit, with bus and cycle priority at all times and in all places. There is no justification for private cars in a densely packed city. They are dangerous, polluting, noisy and socially destructive. Light pollution is a major problem, causing stress in humans, and interfering with the diurnal habits of wildlife. All street lamps should be motion sensitive - i.e. they	7	The draft Local Plan has been prepared in line with the National Planning Policy Framework and its principles for sustainable development, as well the London Plan policies around 'Good Growth', which is defined as growth that is socially and economically inclusive and environmentally sustainable. The draft Local Plan acknowledges the issue of the global climate emergency. Informed by the Council's Climate Emergency Action Plan it includes a suite of policies to support the transition to low and zero carbon development, including for requirements for new buildings, support for the retrofitting of existing stock, and enabling modal shift away from private car use to more sustainable modes. Further details are set out in the Part 2 policies on Sustainable Design and Infrastructure and Transport and Connectivity respectively.	No change.

				should be off unless someone is there. Lewisham should be a dark sky area, with as little light pollution at night as possible. We need to organise our shops and amenities so that everyone is within walking distance of what they need. The '15 minute city'. Nobody should get in a car to get anywhere. Nowhere in this 'vision' is there real, imaginative, ambition. What a missed opportunity. **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below** None selected **6. Please provide your comments on the site allocation(s) selected above.** N/A **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A		The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set out clearly in Part 2 Transport policies. However, speed limits are outside the scope of the local plan. The Council does not exercise control to ban polluting vehicles from roads. It will however continue to lobby the London Mayor / Transport for London to extent the ULEZ beyond the South Circular. Light pollution is addressed in the Local Plan Part 2 policies dealing with amenity. The proposed spatial strategy for the Borough, set out in the draft Local Plan Part 1, seeks to promote the 15-minute neighbourhood/city concept.	
		3	LWA	**1. Do you have any comments on the proposed vision?** N/A **2. Do you have any comments on the proposed key objectives?** N/A **3. Do you have any comments on the proposed approaches for the area? Select topic(s) and comment below** None selected **4. Please provide your comments on the topic(s) selected above?** N/A **5. Do you have any comments on the proposed site allocations? Select the site(s) and comment below**	0	Noted. The repair and maintenance of consented development and buildings is outside the scope of the Local Plan. The Council will consider enforcement action where there is unauthorised development. The draft Local Plan Part 2 section on High Quality Design includes a policies addressing shopfronts, outdoor advertisements and digital displays.	No change.

				JK Banquets Hall Forest Hill **6. Please provide your comments on the site allocation(s) selected above.** SO UGLY AND IN APPALLING CONDITION. Frankly, Forest Hill should be ashamed of this place. Not only is the garish signage totally out of keeping with what was once a beautiful Victorian/Edwardian town, but the building itself is literally falling down - holes in the rood, pigeons flying in and out, water pouring into the building. Compulsory purchase order or force them to repair/maintain the building. Why can the council not regulate disgusting garish signage like that?? **7. Are there any other issues and/or approaches for the area that you feel should be considered?** N/A			

Lewisham Local Plan

Regulation 18 consultation statement

Appendix 3 – Regulation 18 Draft Local Plan Commonplace Responses Parts 4 and 5

September 2022

Part	Section, policy or paragraph	Respondent submission	No. of Agreements with comment	Council officer response	Action
4		You need to take local people of this journey so I would like to see a continuing communication and consultation strategy more clearly articulated.	1	The Council's adopted Local Development Scheme sets out information on the plan process and consultation opportunities. The point is noted and this information will also be included on the local plan webpages.	Update the Council's local plan webpages to include a summary of consultation feedback and information of next steps in the plan preparation process. Consultation on the Regulation 19 version of the Local Plan will be publicised in accordance with the Council's adopted Statement of Community Involvement and relevant planning regulations.
5		How is anyone meant to have an opinion on all this information? It makes me want to leave Lewisham after living here happily for 30 years. I despair every time I see all the tower blocks when I go to the centre, there seems to be a new one every time I visit	0	The length of the draft plan reflects that it will update and consolidate 4 adopted plans into a single document. We prepared a summary version of the Local Pan to accompany the document to make the process more accessible. We also structured the Commonplace site by topic	The Local Plan has been reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan has also been prepared.

				and area – again to aid accessibility.	
5		The size of these and the fact they have to be there at all indicates that the plan is really not written to be read and understood without knowledge of planning jargon. If you want to engage with local people then you need to use a medium that is easly acessed and understood.	0	The length of the draft plan reflects that it will update and consolidate 4 adopted plans into a single document. We prepared a summary version of the Local Pan to accompany the document to make the process more accessible. We also structured the Commonplace site by topic and area – again to aid accessibility.	The Local Plan has been reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan has also been prepared.

Lewisham Local Plan

Regulation 18 consultation Statement

Appendix 4 – Commonplace Interactive Map Responses

September 2022

Where are you commenting on?	Why do you feel this way?	Topic	Officer response
Fernbrook Road	Continued lack of interest from TFL and the Council about speed tables that, when passed over by buses or delivery vans, make the houses shake. Cars still speed down the street so the table is not providing any benefit and is in fact damaging properties and causing unnecessary mental health issues for residents.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Speed limits are outside the scope of the Local Plan.
Mayow Park	This is an amazing park with a great cafe, tennis and community sports with an active Friends group.	Community Infrastructure, Green Infrastructure	Noted. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Catford Bridge	Neglected.	N/A	Noted. The draft Local Plan includes proposals to regenerate Catford town centre, including the area around Catford Bridge.
Unused green space	This green space right near Dacres Wood Nature Reserve has so much potential. Instead it is full of overgrown weeds, broken benches and litter. What a waste of an amazing space for local residents to use.	Green Infrastructure	This comment will be passed to colleagues in the Parks, sport and leisure team. The Local Plan advocates the principle of a Greener Borough ensuring all Lewisham residents benefit from quality green spaces.

Sandhurst road	Traffic - allowing large trucks to use sandhurst/sangley as a south circular alternative. Too many bus routes for a norrow residential road.	Transport and connectivity	This comment will be passed to transport colleagues.
Mayow park	It is a nice space	Green Infrastructure	The Local Plan advocates the principle of a Greener Borough ensuring all Lewisham residents benefit from quality green spaces.
Mercia Grove	A small conservation area in lewisham central is overrun with business vehicles day and night. Residents fear for their lives should an ambulance be needed as access is regularly blocked by non-resident vehicles. The unique nature of the road is threatened by development above the roofline on Lewis Grove. Residents of adjoining areas habitually fly tip at the intersection and the cost to the council of cleanup rises yearly.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling The enforcement of flytipping is outside the scope of the Local Plan.
The High Street	Whilst the high street does seem to be improving, I feel the high street has so much potential and the vacant units could attract quality retailers.	Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities. The Local Plan includes policies which provide greater support for the temporary use of vacant units.
Railway bridge from Dacres Road	The bridge is not accessible for people in wheelchairs or with prams. Which makes it very difficult to support all the great businesses on Dartmouth Road. It also feels	High quality design, Community Infrastructure,	This comment will be passed to transport colleagues. The Local Plan aims to create Healthy and Safe communities by addressing the detriments of physical and mental health. The Local Plan also aims to provide physical infrastructure needed to support

	unsafe and it and the surrounding area are filthy	Transport and connectivity	growth and sustainable places, including through the use of CIL funding and developer contributions.
home park	Full of litter, playground often in disrepair, old toilet block unused, Gazebo attracts drug users	Green Infrastructure, community infrastructure	This comment will be passed to the parks, sport and leisure team. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Road crossing at Windrush Lane/Mayow Road/Sunderland road	This is where lots of families cross the road to go to and from Perrymount School. There is no crossing, it's dark, the traffic moves really fast and it's hard for cars on the roundabout to see people crossing	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Lighting	The lighting on Kangley Bridge Road needs improvement - it feels very badly lit and not comfortable to walk to/from the station in the dark. The fact that the Bridge is currently closed doesn't help.	High quality design, Community Infrastructure, Transport and connectivity	The Local Plan aims to create Healthy and Safe communities by addressing the detriments of physical and mental health. The Local Plan also aims to provide physical infrastructure needed to support growth and sustainable places, including through the use of CIL funding and developer contributions
Beckenham Place Park	Because it is mostly natural parkland, it feels like I am miles away from London, all the filth, crowds, traffic, people, my dog can swim in the river, and I can BREATHE. I live the antique fairs, jazz bands, stable yard and garden, but the house needs work - keep the artists and make the rest into a much nicer wedding venue/conference centre/boutique hotel, something other	Green Infrastructure	The Local Plan advocates the principle of a Greener Borough ensuring all Lewisham residents benefit from quality green spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

	than a falling down mansion way past its best		
Springbank road	Lack of investment on this street compared to the other side of the tracks on staplehurst road is very noticeable. Paving in bad state of repair, constant fly tipping, no enforcement on bins being left on the pavement permanently and shops purposely being made unrentable to try and get a change of use to flats.	Sustainable design, Economy and culture, High quality design	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities.
Woolstone Road	Every day people speed down this road recklessly, and ridiculously fast. Even the buses ignore the speed limit. Many, many residents have had their parked cars damaged by speeding cars and buses. There are families with pets, young children, elderly folk, a play school, Drs surgery - someone is going to get hurt. Cranston to Houston crossing also dangerous - people drive across Woolstone without even looking	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Speed limits are outside the scope of the Local Plan.

Parkfield Road (A2)	Dangerous pedestrian crossing, and a neglected feel	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling. Comments will be passed to colleagues in the Transport team
Mayow Park	Why would you suggest a fenced dog area? It's a PARK. How about a fenced child area, or a fenced dog-haters area? Or how about a fenced area for all those disgusting people who have massive picnics and leave their trash all over the place for other people to clear up?? The vast majority of dogs are well behaved, and the vast majority of dog-owners are responsible. LEAVE US ALONE! We pay our council tax you know. Mayow is as much ours as yours!	Green Infrastructure	Comment to be disregarded due to derogatory tone.
JK Banquets	Please do something about that disgusting 'banqueting centre', with the hideous garish signage totally out of character, and the holes in the roof with pigeons flying in and out, missing tiles, water pouring into the roof space. It really drags the area down.	High quality design, Sustainable design	Noted. The council does not exercise control over development which has been consented.
The bridge Leisure	Closing the Bridge Leisure are Centre will really negatively affect the health of our community.	Economy and culture, Community Infrastructure	The Local Plan aims to promote Healthy and Safe communities by addressing the wider detriments of physical and mental health. The Local Plan will also aim to ensure the delivery of high quality health (including leisure) facilities that meet the need of the local community.

			Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.
Sydenham Library	The library is in need of investment to update it to meet the needs of the diverse community	Community Infrastructure	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
The public lavatory outside Sydenham station	Years ago there was a perfectly serviceable lavatory on this spot requiring minimal attention. It was closed and years later replaced by a highly expensive (though free to users) lavatory that could be used by only one person at a time. For over a year now this modern wonder has been out of operation. Why?	Community Infrastructure	Comment will be passed to colleagues in Park, Sport and Leisure.

High Street and "Lower Sydenham"	Considering Sydenham has 2 mainline train stations and the East London Line, I'm surprised it has been overlooked for regeneration by Lewisham Council.	High quality design, Housing	The draft Local Plan sets support the vitality and viability of Sydenham District Centre.
Mayow park	Green space, nice cafe and mostly toilets! Such an improved space. Some sail or other type of shade fir the dog free children's area would be great for the summer.	Green Infrastructure; community infrastructure	Comment to be passed to colleagues in Parks, Sport and Leisure. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
	Appalling for cyclists. And not much better for pedestrians. Too much traffic. Too polluted	Transport and connectivity	comment highlights a need for an improved cycling infrastructure and the strategic objective of healthy and safe communities

The pedestrian crossing and general street design	This is a missed opportunity to do something about this dangerous crossing and the general car centred forest hill main area. Pedestrians are expected to perch on the tiny island in the middle of the road. The traffic light sequence means it's rarely safe for pedestrians to cross and the priority is completely about cars. The whole area is tarnished and degraded by the focus on the south circular flowing freely with no thought for the pedestrian.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Holbeach Road Car Park	No free parking. This deters people from shopping in the area and using local businesses.	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards.
Bins near Montrose Court & Rattray Court	Bins frequently not emptied by council, council collections spilling waste over road, and fly-tipping hotspot.	Sustainable design, Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement The enforcement of flytipping is outside the scope of the Local Plan.
225 bus extension	The 225 bus extension was announced by the local Labour party but TfL have confirmed no plans to extend. Poor bus links in the Verdant Lane area, causing people to need to use cars.	Transport and connectivity	The Local Plan will be used to aid the Council with working in partnership with bodies such as Central Govt, GLA, TFL, Network Rail and other stakeholders to increase transport capacity. It is not however within the scope of the Local Plan to influence bus or rail timetables.
225 bus extension / local transport	225 bus extension was promised by local Labour party, but TfL have confirmed not	Transport and connectivity	The Local Plan will be used to aid the Council with working in partnership with bodies such as Central Govt, GLA, TFL, Network Rail

	going ahead. Poor transport links on Hazelbank Road / Bellingham Road		and other stakeholders to increase transport capacity. It is not however within the scope of the Local Plan to influence bus or rail timetables.
Public garden on Verdant Lane / Pasture Road Junction	Unappealing except for drug dealers who seem to do good business at this location.	N/A	Comment will be passed to colleagues in the Neighbourhood Community Safety Service.
Catford Town Centre	It's drab and busy. Glad to hear that council want to re-imagine this area!	High quality design	Noted.
Bakerloo Line Extension	Bakerloo Line extension MUST continue between Lewisham and Hayes. It has been hinted that it might terminate at Lewisham - further south needs it more!	Transport and connectivity	The Local Plan will be used to aid the Council with working in partnership with bodies such as Central Govt, GLA, TFL, Network Rail and other stakeholders to increase transport capacity. The route for Phase 1 of the BLE has been established with a safeguarding Direction in place. The GLA is currently reviewing the feasibility of route options for Phase 2 of the BLE, beyond Lewisham station.
Blackheath (LGBT hate crime)	LGBT hate crime not acceptable	Health and Wellbeing	Noted. The Council agrees that LGBT hate crime is not acceptable under any circumstances.
Leegate Shopping Centre	Drab, empty properties	Economy and Culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities. The Local Plan includes proposals to facilitate the regeneration and renewal of Lee Green District Centre.

Bins near Braemar Court	disgusting, always overflowing and street filled with litter	Community Infrastructure	Comment will be passed to colleagues in Waste Management
Hither Green Station (Springbank Road Exit)	Now closed at off-peak hours	Transport and connectivity	It is not within the scope of the Local Plan to manage the opening and closing times of TFL or Network Rail managed stations.
Hither Green Station (Toilets)	For years toilets have been closed in the day and sign tells customers to speak to staff for key, but they always say they don't know where it is and do not attempt to find it.	Community Infrastructure	Noted. Comment does not relate to a strategic planning issue
N171 bus towards London	The last N171 bus towards leaves at approximately 03:40, hours before the first train. It is very busy, indicating a clear demand.	Transport and connectivity	The Local Plan will be used to aid the Council with working in partnership with bodies such as Central Govt, GLA, TFL, Network Rail and other stakeholders to increase transport capacity. It is not however within the scope of the Local Plan to influence bus or rail timetables.
N171 towards Tottenham Court Road	Last bus is HOURS before first train from Hither Green.	Transport and connectivity	The Local Plan will be used to aid the Council with working in partnership with bodies such as Central Govt, GLA, TFL, Network Rail and other stakeholders to increase transport capacity. It is not however within the scope of the Local Plan to influence bus or rail timetables.
Hither Green Cemetery	The cemetery was closed for months, even after cemeteries all over the country were open! It's still frequently closed during a funeral, despite the size of it.	Community Infrastructure	Comment will be passed to colleagues in Bereavement Services

Molesworth Street (Northbound)	There is already a wide cycle lane on the pavement, which is really good. Now the left lane has been closed off for an additional cycle lane. Neither cycle lane is frequently used. Now traffic wishing to go straight ahead at the traffic lights towards Loampit Vale has to wait behind traffic turning right towards Lee High Road and Lewisham Hill.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
No pin dropped	Nice green space	Green Infrastructure	Noted.
Fly-tipping hotspot	Don't like fly-tipping, especially when it's not cleared	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement
Post Office closed	The post office was closed. This area is poorly served.	Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities. The council exercises no control over the closure of post offices.
1-12a Sandhurst Road	Car parking on pavement - almost always. Overflowing waste almost constant. Large crowds gathering outside barbers making noise.	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards.
Hither Green Cemetery	No gate into cemetery from Cumberland Place	Community Infrastructure	Comment will be passed to colleagues in Bereavement Services

(Cumberland Place access gate)			
Torridon Road Primary School (barriers)	Barriers in road causing traffic congestion. Even though schools are currently closed to all but a handful of vulnerable pupils.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Verdant Lane (20mph speed limit)	I agree with 20 mph I think everywhere else in the borough, but 30 mph is appropriate on Verdant Lane.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Speed limits are outside the scope of the Local Plan.
Verdant Lane (20mph speed Limit)	I support 20 mph throughout almost every road in the borough, but Verdant Lane should be 30 mph.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Whitefood Lane (20mph dual carriageway)	I support 20mph speed limits throughout almost all of the borough, but 30 mph is appropriate on Whitefoot Lane	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Fly-tipping hotspot	I don't like fly-tipping.	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement
Overflowing commercial bins	Don't like waste all over street.	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement

Illegal parking on pavement	Business owners (especially a pizza/chicken takeaway and a motor cycle shop) park vehicles illegally (including ones with illegal registration plates) blocking pavement	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards.
South Circular / Verdant Lane / Hither Green Lane Junction	Poorly designed. Especially: * traffic from Verdant Lane turning right see green light and turn right in front of oncoming traffic because they don't know to wait for filter arrow or no oncoming traffic. * traffic blocking pedestrian crossing by railway bridge. * traffic undercutting in left lane out of Verdant Lane to turn right. * traffic in right lane on St Mildred's Road to turn left * traffic in right lane of Hither Green Lane to turn left	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
No free parking near delivery office	Risk of being ticketed while collecting mail.	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards. CPZs outside the scope of the Local Plan
Lack of lighting	Dark and unsafe	Sustainable design, Community Infrastructure	The Local Plan aims to create Healthy and Safe communities by creating safer neighbourhoods and improve perceptions of safety by ensuring the built environment comprises of welcoming spaces.
Slippery pavement	Slippery pavement caused by water coming down from railway and moss growing.	Sustainable design, High quality design	This is not within the scope of the Local Plan. To be addressed by Network Rail

Illegal parking	Illegal parking, especially vehicles related to garages, often with parts (wheels, wings, windows) missing, often no registration plates or registration plates covered.	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards.
Poorly-designed junction	Poorly designed junction - confused motorists (South Circular, both eastbound and westbound) - safety issue	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Forster Memorial Park	Nice park but toilet facilities needed!	Community Infrastructure, Green Infrastructure	The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
I strongly agree with the previous comments to many cars parked on the road.		Transport and connectivity	The Local Plan conforms to the London Plan car parking standards. CPZs outside the scope of the Local Plan
Narrow Pavement	The pavement is too narrow while the street is too wide. It's a 20mph road that looks like a 4 lanes!! On the other end, the front gardens are parking for trash bins leaving no room for much needed greenery. Alternatively the gardens are planted but the bins are sitting on the pavement reducing the width for pedestrians.	Transport and connectivity, Green Infrastructure	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Placement of personal bins is not within the scope of the Local Plan.

Lack of railway crossings	Forest Hill town centre is dissected by the railway. A lack of accessible pedestrian crossings means that commercial sites east of the railway are cut off from the main centre and southern part of Dartmouth Road, reducing footfall and limiting potential for expanding and intensifying land use east of the railway. Residents on the east of the railway have longer walks to the main centre and pools/ leisure centre.	Transport and connectivity	The Local Plan sets out policies to enhance access and permeability in the Forest Hill District Centre, including public realm enhancements at the station approaches.
Mayow Road crossing into Mayow Park	Since closure to a number of streets post COVID, traffic is diverted to Mayow Road causing volume and speeding of cars making it unsafe to cross the road into and out of the park, particularly with young children.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Street scape	Much better street scape on Brockley Road. Make the street more lively and support local business as well as the library.	Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Adamsrill Road	Cars are using this street as a rat race to cut through Sydenham through to Perry Rise. The road widens outside of the school and drivers take the opportunity to speed at all hours of the day and night making it unsafe and causing noise pollution at night.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

De Frene Road	The pavements are in a terrible state having been patched up badly by utility companies over many years, the trees that used to line the road have been removed and cars often travel down the road as if it is a racetrack.	Transport and connectivity	
Mayow Road	This road is dangerous to cross. Cars travel at high speed and often overtake on the wrong side of the island. The recent road closures on Bishop Thorpe and Silverdale have increased the volume of traffic and traffic calming measures are needed. The island is not large enough to comfortably accommodate a family, especially with buggies / bikes / scooters when heading to Mayow Park.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Better Access & Flexibility	There is presently poor stair levels and no disability access and I see multiple people using unsafe ways to get to and off platforms. The scenes at peak times are also horrifying with the trains completely full.	High quality design, Community Infrastructure	The Local Plan will be used to aid the Council with working in partnership with bodies such as Central Govt, GLA, TFL, Network Rail and other stakeholders to increase transport capacity. And improve transport infrastructure. It is not however within the scope of the Local Plan to influence bus or rail timetables.
Main high street	There is no maintenance here of shop fronts. Used by multiple facilities like meat supplies etc. which are not customer facing and internal so should be allocated to much needed useful services.	Economy and culture, Sustainable design	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities

Bellingham Leisure Centre	It is great we are identifying so many spaces to utilise better but this great space to boost health and local community is really shambolic at best. Really poorly equipped and maintained. If this can't be improved then utilise this space for something better.	Economy and culture, Community Infrastructure	The Local Plan aims to promote Healthy and Safe communities by addressing the wider detriments of physical and mental health. The Local Plan will also aim to ensure the delivery of high quality health (including leisure) facilities that meet the need of the local community.
Bridge Broken/dirty/unsafe	We requested and the contractors worked on it for four months last year causing disruption but the bridge is nearly back to its old state. Clearly showing how much it is utilised to use the walkway. This needs to be improved. Also, multiple people smoking and unlawful activities heard of on social channels really need to be checked near a great walking area and way.	Community Infrastructure, Transport and connectivity	The Local Plan aims to promote Healthy and Safe communities by addressing the wider detriments of physical and mental health. The Local Plan will also aim to ensure the delivery of high quality health (including leisure) facilities that meet the need of the local community.
Broken Pavements and poorly lit	The whole road has broken pavements which forms multiple puddles in rains and also unsafe walking conditions in wintery evenings as lack of street lighting too	Transport and connectivity	Comment will be passed to colleagues in Highways
Lee Station Approach on Burnt Ash Lane	Too car oriented.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Brockley Grove	Speeding cars (and buses!) are out of control on Brockley Grove. This does so much harm to our neighbourhood in terms of safety, pollution, and noise.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Brockley Rise	Traffic lanes are extremely wide and average speed is far above 20mph, especially on the downhill stretch.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Stillness school / Brockley Rise	Needs school streets implementation	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Linear Park	It is hugely popular at the moment, thanks to extra exercise being taken. It is looking unloved. The so-called repairs to the bridge at the conjunction of the Ravensbourne and the Pool are appalling. Some cyclists are a nightmare. No attempt to socially distance and walkers are expected to dive off the paved path. Unleashed dogs, with owners thinking we ALL must love their animals. Many of those dog chasing the birds in the river, with owners not intervening.	Transport and connectivity	Comment refers mostly to restrictions that were in place during the Covid-19 lockdown
Stondon Park	The pavements on both sides are much too narrow, especially the one with cars parks on the pavement. And there is no need for such wide lanes. It encourages speeding, over-taking and it's not wide enough to include a bus lane so it doesn't help with traffic.	Transport and connectivity	Comment will be passed to colleagues in Highways Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Honor Oak Park	Traffic speeds down it during quiet times which is a danger to families using the local services. The pavement outside the station is much too narrow, it only allows for single-file pedestrians, it doesn't allow for social distancing of even safe access in and out of the station. And the road too wide, encouraging speeding. The road is constantly leaking from the water mains and all repairs have been poor leading to further damage only a few weeks later. There are several sites like this all along Honor Oak Park and pot holes are increasing. Speed pillows don't restrict speed as drivers just straddle them and carry on at more than 30mph. The road is too narrow for buses because of the volume of parking spaces. The road is a local family friendly street and it is dangerous to have lorries driving down it. There are not enough safe crossing points, people frequently run across the road in between traffic between Sainsbury's and 2 spoons/Mama Dough. There are too many pizza takeaways now that Dominoes has arrived, they should not have been given permission to lease a business there. They also cause too much waste building up on the pavement and	Transport and connectivity	Comment will be passed to colleagues in Highways Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

	their moped drivers are inconsiderate of local neighbourhood streets. The bus stop on the high street stops all traffic when buses are stopping and the Sainsbury's lorry is loading. And also forces train users to go back along the very narrow pavement to the station. Free parking on the side roads is causing commuters to take up local parking spaces and making the roads single lanes.		

Beadnell Road	Rubbish dumped on the alleyway between Beadnell Road and Garthorne Road, and no way of getting to Devonshire road and beyond other than going to the very busy Honor Oak Park or Forest Hill area which are not pedestrian friendly.		Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Environment Crime Enforcement
Manor Park	Speeding always has been a problem and still is. Made worse by the comparatively empty streets since the LTN was imposed. Very dangerous for pedestrians/cyclists.	Transport and connectivity	Comment will be passed to colleagues in Environment Crime Enforcement
Hither Green Station	Step free access to all platforms - for wheelchair users and those less able to use stairs. The entrances and exits to the station can be foreboding at night. Sage secure cycle lockers with a very visible security camera. A pick up and drop off area for cars.	Community Infrastructure, Sustainable design, Transport and connectivity, High quality design	The Local Plan will be used to aid the Council with working in partnership with bodies such as Central Govt, GLA, TFL, Network Rail and other stakeholders to increase transport capacity and improve rail infrastructure.
Manor House Gardens	A lovely park - has a few issues. Adult cyclists using it as a 'rat-run' cycling at speed with no consideration for people on the foot path. The Dog exercise area is very well used in all weathers. The planting/trees/grass/gates and fences are always neglected and in disrepair.	Green Infrastructure	Comment to be passed to colleagues in Parks, Sport and Leisure.

Entrance to Waterlink Way	To get to the Waterlink Way you have to go past the side of Sainsbury's and the place the buses turn. There is nothing inspiring or safe about getting children to this lovely green area.	Transport and connectivity	The Local Plan advocates the principle of a Greener Borough ensuring all Lewisham residents benefit from quality green spaces. The plan includes policies which seek to enhance access to Waterlink Way.
the pavements and roads on this estate	The pavements are falling into disrepair, becoming a trip hazard for elderly residents, as well as looking unsightly. A combination of slabs and tarmac, with lots of grass growing through them.	Transport and connectivity, Community Infrastructure	Comment to be passed to colleagues in Highways
Mayow Park	The park has so much to offer: ancient oaks, a great variety of other trees, birds and other wildlife. Children's playground and zip wire area. Wooded areas. An orchard. Playing field. A large hay meadow opposite the cafe. The cafe is popular and it's great to have toilets. The Friends of the Park work with Glendale and Lewisham to ensure the park is the best it can be.	Green Infrastructure	Noted. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Street crossing	This crossing is a perennial issue. It is dangerous.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling. This comment will be passed to colleagues in Strategic Transport
Street crossing	This crossing is very dangerous. Traffic speeds along Mayow Road and pedestrians attempting to enter Mayow Park are at risk of being hurt.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling This comment will be passed to colleagues in Strategic Transport

Home Park	Home Park is a beautiful space but it is woefully under-cared for and badly in need of maintenance. It is recognised by the Lewisham Council parks & open spaces strategy 2020-2025 as being under funded and in need of support.	Green Infrastructure	The Local Plan advocates the principle of a Greener Borough ensuring all Lewisham residents benefit from quality green spaces The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Cycle lane/on street parking	On street parking on both sides of Sydenham Hill—at this point and towards Rock Hill—narrows the road causing cyclists and motorists to come into conflict with one another. There is ample off-street parking for all the properties along Sydenham Hill, so it would seem completely unnecessary to allow parked vehicles to block cyclists' use of the cycle lane. (The recently painted cycle lane around the edge of some of the parked vehicles is too narrow and places cyclists directly in the 'door zone'—i.e. making them vulnerable to vehicle users suddenly swinging open a door into the path of cyclists.)	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards.

Mayow Park	Mayow Park serves a very diverse community: a range of ages, ethnicity, single people, couples, families with children, people with dogs, all generally get on together. You can get to know other locals over time by visiting the park regularly. But it can feel too small for the amount of people using it. Unfortunately a VERY few dog owners want their own fenced off dog area which would shrink the amount of space available for anyone else. Dogs and their owners are for the most part a valuable part of the park community and get involved with the life of the park.	Green Infrastructure	The Local Plan advocates the principle of a Greener Borough ensuring all Lewisham residents benefit from quality green spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Incoherent plans from the council in terms of air quality		Sustainable design	The Local Plan includes a dedicated policy on Air Quality, which is considered to be consistent with the London Plan, and will work together with the Council's Air Quality Management Strategy.
Bridge over the railway - important link	This is an important link across the railway, connects me across to forest hills pool, Crystal Palace and Sydenham wood - used by lots of families as safe crossing	Transport and connectivity	The Local Plan also aims to provide physical infrastructure needed to support growth and sustainable places, including through the use of CIL funding and developer contributions

Sayes Court playground	The children's playground at Sayes Court is in terrible condition and badly designed. Some many local residents don't have access to private outdoor space and rely on playground like this for their children to get fresh air and exercise. This playground is poorly maintained, makes terrible use of the available space and attracts rubbish and vandalism because it doesn't looked cared for. It's also under used because it's such a grim prospect.	Green Infrastructure	The Local Plan advocates the principle of a Greener Borough ensuring all Lewisham residents benefit from quality green spaces. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Dangerous road	Sydenham Hill is a very dangerous road. Firstly, cars should be prohibited from parking on the road. At least one major accident involving an upturned car has happened here in the last year. Secondly, a cycle Lane is needed (a proper cycle super highway) connecting Lewisham with Southwark from Crystal Palace to Sydenham Hill, the down Sydenham Hill to the South Circular and then beyond to useful destinations such as Peckham.	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards. Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Speeding cars/buses	Far too many vehicles abusing the speed limit on Kirkdale. Is it possible to put speed cameras in place.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Junction Manwood/Ewhurst Road	Horrific junction for pedestrians & cyclists using this main route which connects/access to Prendergast Ladywell Primary School & Ladywell Fields park, which are key community places.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Moving from Lewisham station to Lewisham Centre	Getting from Lewisham Station to Lewisham Centre is a nightmare for cyclists and pedestrians. Car driving is prioritised.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Water Link Way Extension to Thames.	The Waterlink Way from Sydenham to Ladywell is very nice and gets a lot of use. Is it possible to extend it to the Themes as there is no easy walk/cycle way once you leave the Waterlink Way @ Ladywell.	Transport and connectivity, Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.
Walkway from Dacres Road along railway to FH station.	The pathway that runs along the railway line feels a bit neglected with litter and overgrown weeds, specially towards the FH end. Don't always feel safe even in the day. The area near FH pools where the benches are is often full of litter and sometimes people drinking there which is not very inviting for a high street like Dartmouth road.	Transport and connectivity, Green Infrastructure	Comment will be passed to colleagues in Parks, Sport and Leisure and the Neighbourhood Community Safety Service. The Local Plan advocates the principle of a Greener Borough ensuring all Lewisham residents benefit from quality green spaces

Unsafe roundabout @ Kirkdale.	The roundabout junction is not safe to cross. Needs a pedestrian crossing. Should not be so difficult to roll out pedestrian crossings, and it does not need to made political as it is such a basic requirement.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Underpass for FH train station needs to be made cycle friendly	Pls make the underpass at FH station cycle friendly, then adjust the road/lights so that cyclists leave the south circ and go under the rail tracks, and rejoin the south circ near Morleys/Coop.	Transport and connectivity	The Local Plan aims to provide physical infrastructure needed to support growth and sustainable places, including through the use of CIL funding and developer contributions. Comment will be passed to colleagues in Strategic Transport
Cycle highway from East Dulwich station through FH to Catford.	Please create a proper segregated blue cycle superhighway along the South Circ. Please also reduce the speed limit to 20mph from the end of Lordship Lane right through to Catford to make it safe. The hills in this area make cycling very dangerous to begin with.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Cycle lane Brockley Rise to New Cross.	Think this would make another good segregated cycle superhighway.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling. Comment will be passed to colleagues in Strategic Transport
Eliot Bank	Eliot Bank is in a VERY bad state of repair. Presumably the council do not own it? But who does, and can they maintain it because grit and mud spills onto Sydenham Hill and surrounding footpaths.	Transport and connectivity	Comment to be passed to colleagues in Strategic Transport

Footpath connecting Sainsbury's/ London Road with Derby Hill Crescent and Thorpewood Ave	Footpath is neglected, with poor lighting and paving. Feels unsafe when it is dark.	Transport and connectivity, Community Infrastructure	Comment to be passed to colleagues in Highways The Local Plan aims to create Healthy and Safe communities by creating safer neighbourhoods and improve perceptions of safety by ensuring the built environment comprises of welcoming spaces.
Buckthorne Cutting	Half if the Buckthorne Cutting is a fantastic nature reserve but it has not been included in the Local Plan - not even as a Lewisham Green space. The other half of the Cutting is falling in to neglect and disrepair under property development management and is under threat even though it is listed as an Asset of Community Value.	Green Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection the Local Plan can designate on a Green Space.
Courtrai Road Scout Hut SE23	This is a neglected community space for children and your people. It has been empty for years and looking worse and worse but could be lovely.	Community Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection the Local Plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Buckthorne nature reserve	It is an amazing place full of local people volunteering to make it special but in the local plan it is not listed or recognised.	Community Infrastructure, Green Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection the Local Plan can designate on a Green Space.

Courtrai Scout Hut	This land has been sitting derelict for way too long! Local kids need somewhere to go that is green and full of trees and wildlife.	Community Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection the Local Plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Courtrai road site	It is now a dirty eyesore, I believe a church occupies the old scout building. And it has a big green space behind it that no one is allowed access to.	Community Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection the Local Plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Buckthorne Cutting Nature Reserve	Because you haven't even bothered to include this amazing local green space on your map! It's been here for three years providing sessions for local schools and nurseries & you don't even know it exists. You have put the picnic tables the fourth reserve provided and decorated with lovely art work on the eddystone bridge on the map but don't recognise this brilliant green space. Put it on the map.	Green Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection the Local Plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions

Railway cutting alongside Honor Oak Park station	This is part of the railway cutting which has been categorised as a site of Importance to the whole of London for Nature Conservation, but it is not being maintained for nature conservation by Network Rail. This is damaging to the wildlife corridor.	Transport and connectivity	Comment to be passed to colleagues in Green Scene. The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection the Local Plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
The railway cutting alongside Honor Oak station	Because it has the designation of a Site of Metropolitan Importance for Nature Conservation but has been concreted over.	Green Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection the Local Plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Honor Oak Park train station	Station itself nice with friendly helpful staff. But you come straight out onto a road with horrible broken railings, and no space for people to pass each other. Turn left down the road and there's a large pavement area.	Transport and connectivity	Noted. Comment will be passed to colleagues in Strategic Transport

Buckthorne cutting	Beautiful space for children and adults alike to enjoy nature, wildlife and precious green space	Green Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection the Local Plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Buckthorne cutting Courtrai rd	Scout hut woodland site in disrepair- developer trying to sell woodland that could be nature reserve	Community Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection the Local Plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Home Park	I have lived next to Home Park for 20 years and it has never been a park I have been happy to use, even when the kids were small. Uninspiring, covered in dog mess. Poorly laid out.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. This comment will be passed to colleagues in Parks, Sports and Leisure
Parbury Road	Speeding cars in street full of young children. Cars have been heard revving their engines and racing down the street and slamming on their brakes. What chance do	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

	children have? Speed bumps are useless and polluting.		
Grierson road	Fire gate onto Honor Oak Park is overrun by mopeds and motorbikes. This is illegal and not being enforced. I have seen a few near misses with pedestrians.		Comment will be passed to colleagues in the Neighbourhood Community Safety Service
No protection for Duncome Hill Green	Despite a lengthy campaign by local residents and some Council members to prevent a totally inappropriate building development on this site, there seems to be no commitment in the latest version of the plan to protect this valuable green space.	Housing, Green Infrastructure	Site has been designated as Local Green Space in the Crofton Park and Honor Oak Neighbourhood Plan giving it the same protections as MOL and Green Belt.
Agnew Road	There is a new electric car charger but there is no marked bay stating that it is for electric vehicles only. Often cars park there that are not electric meaning no electric cars can charge.	Transport and connectivity, Sustainable design	Comment will be passed to colleagues in Strategic Transport. The Council has a strategy already in place to increase the number of electric charging points.

Honor oak park	Cars speed down the hill as there are inadequate speed restrictions. The zebras crossing is really dangerous as the speed often means cars come round the bend and can't slow down in time to stop. It's a really busy crossing because it's next to the station close to many school etc. The crossing should be moved further down to outside Sainsbury's as people try and cross there anyway.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Stinson park	Again traffic speeds along this road, there are frequent accidents but investment was made in improving crouton park, which was great, but no thought to speed restrictions on a long stretch of road which car drivers just see as an opportunity to speed.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
The sad council flower beds	There are several raised 'flower beds' along this stretch of the road with a few half dead rose bushes and weeds. These could be a great asset to bio diversity if given to people in the community to look after. V low cost to out in low maintenance plants. Would hugely improve this stretch of road. They are on both sides of the road	Green Infrastructure	Comment to be passed to colleagues in Parks, Sports and Leisure. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Sydenham Wells Park	Very nicely landscaped and maintained. The walk through Hillcrest Wood is also very nice.	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

Replacing green space with car parking space.	Not exactly sure what's going on here on Eliot Bank but it looks like green space is being replaced with car parking spaces. Why would this be? Perhaps it's temporary due to building works? The flats are only a very very short walk to a very well serviced bus stop on the South Circular and maybe only 7/8 minutes to FH station, so unsure why there's a need for MORE CARS.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling.
Home Park	I feel so sad that this potentially beautiful park is not valued and is underused. The park is used predominantly as a thoroughfare rather than a destination as with other parks in the area. there is so much potential in the park, we have a beautiful avenue of trees- but litter and rubbish tarnish it. we have beautiful open green field that is just stunning in summer light and even more stunning in winter low sun, but is often peppered with dog poo. We have an interesting children's playground, but it is run down with brown equipment, overflowing bins and gates that don't close properly or are so heavy that it could cause injury to a child. The allotment space in the top corner which has SOOOO Much potential, but has been locked for at	Green Infrastructure	Comment to be passed to colleagues in Parks, Sport and Leisure. The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

	least two years. We have the gym which is fantastic, but its placement on the direct route up to the other gate makes it just a corridor.		
Springbank Road	Disgraceful to allow the pavements to fall into such a state of disrepair with bins and rubbish all over the pavements. Compare with the investment Lewisham Council has made on Staplehurst Road to develop the shops.	Transport and connectivity, Sustainable design, Economy and culture	Comment to be passed to colleagues in Strategic Transport and Highways
Staplehurst Road	Too much investment has been focused on Staplehurst Road to the detriment of other areas of Hither Green, particularly the west side of the tracks. Invest in the wider community not just the affluent area.	Transport and connectivity, Sustainable design, Economy and culture	The Local Plan aims to sustain and create inclusive neighbourhoods and communities and promote equality of opportunity for everyone.

Tree-lined footpath along former railway line	This is a unique green corridor along the former railway line with the old railway tunnel. London Wildlife Trust (LWT) ecologists lead guided walks through here. You can continue walking through from Wells Park Rd on a route passing through more woodland to come out onto Sydenham Hill or go on to Westwood Park. The woodland is so wild and natural it feels as though you've discovered it. It's a logical extension to nearby Sydenham Hill Wood at the other end of the tunnel, which is protected by Southwark as a nature reserve of Metropolitan Importance.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.
Courtrai Road, Buckthorne Cutting		Green Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Buckthorne Cutting Nature Reserve	I wonderfully wild nature reserve on our door step. An important green space for many struggling species.	Green Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions

Scout Hut, Court Road, Buckthorn Cutting	This place has so much potential to benefit the community and biodiversity but it has been horribly neglected.	Green Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Winchfield Road/Fairlawn Park	This is a hot spot for flytipping, van loads of rubbish dumped on a weekly sometimes daily basis. It used to be isolated to the concealed entrance to the Lewisham Homes office, but since that has been hoarded for construction, the flytipping has moved to the footpath and the small area of green opposite.	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement The prevention of flytipping is outside the scope of the Local Plan
Scout hut on Coutrai road, parallel to the railway line	This is a great piece of land with beautiful trees and no through traffic. It has been left to deteriorate and was recently taken over by squatters.	Green Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Malpas road	Too much traffic for this narrow residential street. This map is misleading in terms of proportions/size. Malpas road and Florence road are narrow.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Ladywell arena	The track was used by clubs for training and sports and members of the community for a safe well lit space to walk and exercise early in the morning. Now its use is restricted to clubs which excludes the local community.	Community Infrastructure	The Local Plan aims to promote Healthy and Safe communities by addressing the wider detriments of physical and mental health. The Local Plan will also aim to ensure the delivery of high quality health (including leisure) facilities that meet the need of the local community. Comment will be passed to colleagues in Parks, Sports and Leisure.
N/A	It's a dangerous crossing especially if you're with a child or someone who can't walk fast. The path down from the park leads straight across to the road to the pedestrian bridge over the railway. However, this is on a slight hill and traffic from the west can't see pedestrians well and also tend to be driving fast. There's a traffic island a little way to the east but it's that bit less convenient.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Strategic Transport.

Buckthorne nature reserve	After moving into the area in late 2019, my partner and I volunteered at the Buckthorn nature reserve over the summer in 2020. It was a wonderful opportunity for many reasons. It made us both feel much more part of the local community, and like we were giving back to the area. Through the reserve, we got to meet many people active in the community, and became much more interested in the area's history. On top of that, the reserve is a really special place in itself, with really interesting geology and animal life. The addition of tables and garden boxes in the Eddystone road culdersack has also transformed the area. I'm genuinely proud to walk through it and feel like I've contributed something to the community.	Green Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Courtrai Road Scout Hut and old Dandy Fifth park	This was once a community asset, with a rich local history, but has been mismanaged by a property developer and allowed to fall into disrepair.	Community Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions

Buckthorne Cutting	Unused community space	Community Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Sayes Court Park	The tarmac is peeling away and unsafe for children - there are two swings to serve hundreds of children who live the two estates that adjoin this space (neither of which have their own dedicated play spaces). Rubbish accumulates and there is street drinking. What could be a green haven feels like a wasted space for children.	Sustainable design, Community Infrastructure	Comment to be passed to colleagues in Parks, Sport and Leisure. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Playground at Home Park	A once nice little playground, it is now in need of some much overdue TLC. It has not been maintained or shown any love for numerous years and it is now looking worse for wear. There are so many flats and houses surrounding the park, and it is clearly used by a lot of families, but it looks like the authorities have completely forgotten about it	Community Infrastructure	The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy. This comment will be passed to colleagues in Parks, Sports and leisure.

Courtrai road scout hut	Designate as a Local Green Space	Green Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Buckthorne Road	This street would benefit from traffic calming measures - it's used as an alternative to the main road, particularly when traffic builds up and many cars travel down it far too quickly. It is a designated cycle route and crossed by a pedestrian pathway and would benefit from less through traffic.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Courtrai Scout Hut and surroundings	This site has a lot of potential but is currently a deteriorating mess attracting fly tipping.	Community Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions The prevention of flytipping is outside of the scope of the Local Plan.

Buckthorne Road	Cars use this road as a rat run whenever there is congestion or roadworks on Brockley road. They travel at speed in a road where children and cyclists can suddenly appear at the junction of Eddystone road.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Eddystone Road seating area	The volume of Motorcyclists that speed through here is getting dangerous. They serve around the seating and tables where families gather and speed across the footbridge. Someone will one day get killed.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Pedestrian path under railway bridge by Fordham park	The crossing is dangerous, cars come round the corners very quickly sometimes.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Home Park community garden	It obviously has not been used or looked after for more than several years	Green Infrastructure	Comment will be passed to colleagues in Parks, Sport and Leisure The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

Scout Hut site, Courtrai Road	The site is currently poorly maintained and run down, and there is risk to the site's biodiversity and history in letting this continue.		The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Cold blow lane	It's generally unpleasant to walk along this way, as the pavement breaks halfway and you need to cross the road. However cars speed along so can feel really dangerous. It also feels dingy and dark.	Sustainable design, Transport and connectivity	Comment to be passed to colleagues in Highways and Strategic Transport. Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
New cross road	This should be a high street for quite a large local area (e.g. telegraph hill, hatcham etc) but currently is so unloved. A new coffee shop opened recently and has been so popular - suggesting there is demand for local business.	Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Junction A20 with Lewis Grove and Belmont Hill	Virtually no provision for pedestrians seeking to cross the road at this junction with a pedestrian crossing over only one of the arms of the junction.	Transport and connectivity	Comment to be passed to colleagues in Highways and Strategic Transport.
Cold blow lane	The underpass on Cold Blow lane feels unsafe to walk under as a pedestrian - you	Transport and connectivity,	Comment to be passed to colleagues in Highways and Strategic Transport.

	have to keep switching paths as the pavement doesn't continue on both sides.	Community Infrastructure	The Local Plan aims to create Healthy and Safe communities by creating safer neighbourhoods and improve perceptions of safety by ensuring the built environment comprises of welcoming spaces.
Buckthorne cutting - old scout hut and land	Because it's a derelict Scout hut with beautiful trees and wildlife but is fenced off boarded up and not benefitting the community , it could be A nature reserve or community garden has used for woodland activities such as forest school or exploring for local children and families and local schools and nurseries. Because of lockdown everyone has realised the importance of nature and local green space which is accessible and open to the people who live nearby	Community Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Home park	This beautiful park is undervalued and empty.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Mayow road near Mayow Park/ Burghill road	A pedestrian crossing is desperately needed here. This would help kids cross safely and slow down traffic.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Bell Green retail park	Bell Green retail park is too car-centric. It is dangerous and unwelcoming for pedestrians.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling The Local Plan includes proposals for the redevelopment of the Retail Park, which will include the reconfiguration of street layout and public realm.
Mayow road	Crossing the road near park is dangerous especially for kids on school run and using park. Also many car accidents here.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Buckthorn cutting	I am 14 years old but I have never ever been able to go to my local green space. And due to covid I would have liked to have access to it to get a break from online school.	Green Infrastructure	Comment refers mostly to restrictions that were in place during the Covid-19 lockdown
Home Park	Poorly maintained playground, Lacking in facilities: no toilets, cafe People littering - council refuse workers work hard to clean up though	Community Infrastructure	Comment will be passed to colleagues in Parks, Sports and Leisure. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
The Bridge Leisure centre	Needs to be re-opened	Community Infrastructure	The Local Plan aims to promote Healthy and Safe communities by addressing the wider detriments of physical and mental health. The Local Plan will also aim to ensure the delivery of high quality health (including leisure) facilities that meet the need of the local community.

			Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.
Cornmill Gardens concrete culvert	The new concrete culvert between Cornmill Gdns and the Ravensbourne/Quaggy confluence is a disaster. The green corridor so invested in with the Waterlink Way, Ladywell, Cornmill etc has been rendered useless by this intrusive tunnel that stops all species in in tracks. It is now full of rubbish and silt. With this new giant block about to be built, this area will become a dead zone for wildlife.	Green Infrastructure	Comment will be passed to colleagues in Parks sport and leisure. The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Dangerous road junction at Canonbie Road on Honor Oak Road	Rat running up Canonbie Road (very steep) from Honor Oak Road creates a daily problem at this junction on a route that families use to take children to school. The speed and lack of awareness of pedestrians and the topology combine in extremely dangerous driving and associated congestion problems onto Honor Oak Road.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Street space	The pavements aren't wide enough - they force pedestrians into the road to avoid lampposts and residents' bins. People in wheelchairs and mobility scooters would be completely unable to navigate one side of the street which I think is unacceptable. This is exacerbated by cars parked on the pavement, further reducing pedestrian space. When the road is busy it feels very dominated by traffic which isn't very pleasant.	Transport and connectivity	Comment will be passed to colleagues in Highways and Strategic Transport The Local Plan conforms to the London Plan car parking standards. The Local plan also advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
street space	Cars speeding really fast make this area of town feel really dangerous. It's horrible walking along here.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling. Speed restrictions for motor vehicles are outside the scope of the Local Plan. Comment to be passed to colleagues in Highways and Strategic Transport.
Children's play park, Winsford road	The equipment is old and in poor repair, the park is frequently littered, and the space could be must more effectively used.	Community Infrastructure	Comment to be passed to colleagues in Parks, Sport and Leisure. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

Traffic lights for traffic turning right from Perry hill into Perry Rise.	This is a very dangerous junction, it is very hard to see oncoming traffic particularly as there are often buses coming from the opposite direction waiting to turn right into bell green who obscure your view. You can't see whether the lights have changed from a position in the yellow box waiting to turn right. I feel a serious accident here is an inevitability if something isn't done to change the way the lights work. give traffic turning right from Perry Hill a period of time with no oncoming traffic to allow them to make their turn.	Transport and connectivity	It is not within the scope of the Local Plan to manage the frequency of traffic lights.
Sainsburys	Though I feel there is much to do to improve Bell Green I feel it is imperative that Sainsbury's is maintained. There are no other large supermarkets in the area and closing Sainsbury's altogether or drastically reducing it in size would impact on many in the local area who rely on it to do their grocery shopping - particularly those without cars.	Economy and culture, Community Infrastructure	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities The Local Plan includes proposals for the redevelopment of the Retail Park, which will include the reconfiguration of street layout and public realm.
Burford Road	Cars frequently speed skins Burford Road, using it as a cut through from Perry Hill. There are always cars parked on both sides	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling.

	of the road and lots of children around hence it is very dangerous.		Speed restrictions for motor vehicles are outside the scope of the Local Plan.
Perry Hill	Cars frequently speed along Perry Hill, there have been a number of accidents in recent years.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Junction of Woolstone Road, Houston Road and Cranston Road	This is a dangerous junction, I have witnessed several near misses due both cars and pedestrians.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Car park	It is very difficult, especially for people with mobility problems/wheelchair users to leave/re-enter the car park - there's no point having disabled spaces of you can't reach them on foot/on wheels.	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards
Access to Forest Hill station	No step free access to Forest Hill station from Perry Vale meaning a long journey along Waldron Vale and the South Circular.	Transport and connectivity	The Local Plan will be used to aid the Council with working in partnership with bodies such as Central Govt, GLA, TFL, Network Rail and other stakeholders to increase transport capacity and improve transport infrastructure
Constant fly tipping	N/A	Community Infrastructure	Noted. The prevention of flytipping is not within the scope of the Local Plan
Speeding/Problematic speed bumps	N/A	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Launcelot Road	The road is full of cars parked on the pavement and sometimes blocking the pavement for pedestrians. There is an ugly school building that doesn't fit the design of the other buildings at all and is screaming ugliness. There are not enough trees. Car traffic is way too much for this residential road with 2 schools.	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards. Comment will be passed to colleagues in Highways and Strategic Transport
Brockley and Ladywell Cemeteries	The local cemetery is a central space for the community around Brockley, Ladywell and Crofton Park. It is a fantastic place to walk around, pay your respects to those buried there and learn about the community. The trees and plants there make it a great place to escape for short walks. That said, the maintenance of the cemetery is very poor. Paths are broken and access to the location is not consistent. There are three entry points, with the one Brockley Rd and Ivy Rd being the primary one. The secondary one on Brockley Grove and Ivy Road being open some of the time. But the entrance by Brockley Grove and Huxbear St (opposite the Baptist Church) rarely open now. This limits access to the historic open space.	Green Infrastructure, Community Infrastructure	Comment will be passed to colleagues in the Bereavement team. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

Blythe Hill Fields	This is a great park to walk up to with the family, for kids and to see London. It is open and a great location to (pre-pandemic) to meet local friends and family. It is missing some locations to sit down and exercise. Also a local cafe like Pistachoes on Hilly Fields. At night, it needs some more street lighting, designed to avoid upward light-polution.		This comment will be passed to colleagues in Parks, Sport and leisure The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Lewisham High Street and Market	The whole of Lewisham Shopping Centre, High Street and Market needs to be redesigned built up for the community. It is the heart of Lewisham town centre, but feels old and forgotten. It does not deliver to the community or make it into an aspirational destination. The market and stallholders are great for fruit and veg. Great quality and offered at good prices.	Economy and culture, Community Infrastructure	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities. The Local Plan includes proposals to support the redevelopment of the Lewisham Shopping Centre, ensuring the market remains at the heart of the town centre with improved amenity for businesses and visitors.
Marnock Road and Lindal Road Network Rail land	Not good. Rubbish tipped there, no cleaning it up, just no pride in the community as you walk past and see the rubbish and lack of upkeep of the green space by either the council, Network Rail or volunteers.	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement and Parks, Sport and Leisure.

Ladywell Playtower	This venue is being left to rot and decay. The Ladywell community needs this building and location to be renovated so that appropriate facilities are made available to the local community. Debate about this location has gone on for too long.	Community Infrastructure	There is currently a live planning application regarding the renovation of the Ladywell Playtower which at the time of writing will be determined in due course.
Car park	Have seen the notice for development of the car park space. Would be disappointed to lose the car park faculty. If this goes there is no where left to park in the vicinity of forest hill which I think will be a real shame for local businesses there.	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards
Chudleigh Road	Cars speed down the road, both from Brockley Grove to Bexhill Road as well as from that junction to Ladywell Road. These cars and vans go very fast through this residential street.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Ha'penny Hatch approach path	This path is always strewn with litter and fly-tipped items, and is a graffiti hotspot. Often an area where graffiti "artists" congregate too, and it's often antisocial. Lighting is patchy, particularly close to the bridge. It doesn't feel a safe area, and muggings are common.	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement and the Neighbourhood Community Safety Service

Bronze Street	Crumbling walls around the border of Ferranti Park and Sue Godfrey Nature Park - not well maintained	Green Infrastructure	Comment will be passed to colleagues in Parks, Sport and Leisure. The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces
Woolstone Rd	Not even half of all cars stick to the speed limit. Many are even driving recklessly. The road is narrow and I feel extremely unsafe as a pedestrian and cyclist. As a resident on the street I am also impacted and concerned about the air and noise pollution from the road and people speeding. This includes all the through traffic via Cranston Rd making this junction particularly scary to cross	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Bell Green Retail Park Access	Cars accessing the retail park coming from Perry Hill and Perry Rise roads are all speeding recklessly. There is low visibility around the junctions, bad lighting and a general lack of pedestrian friendly infrastructure to navigate the retail park. I do not feel safe at all to visit the retail park as a pedestrian and had 2 near misses with cars.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling. The Local Plan includes proposals for the redevelopment of the Retail Park, which will include the reconfiguration of street layout and public realm. The Local Plan includes proposals for the redevelopment of the Retail Park, which will include the reconfiguration of street layout and public realm.

Catford Rd Bridge	This bridge is absolutely appalling in how unsafe it is for pedestrians and cyclists. The amount of traffic and pollution needs urgent action considering that this bridge is a main access route for the 2 train stations.	Transport and connectivity	The Local Plan aims to create Healthy and Safe communities by addressing the detriments of physical and mental health. The Local Plan also aims to provide physical infrastructure needed to support growth and sustainable places, including through the use of CIL funding and developer contributions. The Local Plan includes policies to support the regeneration of Catford town centre, including public realm enhancements around Catford Bridge.
Pavements	The pavements on this stretch of Catford Hill road are not fit for purpose. Residents block them with their cars and the surface is all damaged from the constant access by people's cars to park here. Even as a well abled walker I have problems navigating this stretch of pavements. It must be near impossible for someone with a pushchair or less abled pedestrian or for the elderly. In particular with the cars on the road next to the pavement all speeding		Comment will be passed to colleagues in Highways. Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Pedestrian Crossing	The pedestrian crossing here is awful. It takes probably 20 minutes to safely cross this junction as a pedestrian with a clear priority given to cars while people have to breath their exhausts while stuck on tiny middle islands. The entire Bell Green Retail park needs a complete rethink about how to make it more accessible for pedestrians.	Transport and connectivity	This comment will be passed to colleagues in Highways. Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling The Local Plan includes proposals for the redevelopment of the Retail Park, which will include the reconfiguration of street layout and public realm.

Wells Park Road	We cross this road with our child every day to use the park. While we are grateful for the zebra crossing and the recent (temporary?) barriers to prevent parking, this road is used often for very fast, very dangerous driving.	Transport and connectivity	This comment will be passed to colleagues in Highways and Strategic Transport. Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Speeding mopeds on Grierson Road	Too many mopeds use Grierson road as a shortcut, obtaining excessive speeds down this normally quiet road. They join Honor Oak Park high street by going round the gate at the end of Grierson road and mounting the pavement.	Transport and connectivity	This comment will be passed to colleagues in Highways and Strategic Transport. It is not within the scope of the Local Plan to determine the types of vehicles that use public roads. Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Junction Ewhurst Road	Crossing the street can be difficult and dangerous. A lot of cars speed up on that section on the road towards Catford too, which make it a hazard, especially for the children at Ladywell Pendergast school.	Transport and connectivity	This comment will be passed to colleagues in Highways and Strategic Transport. Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Cycle track constantly used by motorbikes	The island has space on both sides for cycles and kids play on the island. But there are constant motorbikes coming through, often at fast speed. It is often the same motorbikes at the same time of day.	Transport and connectivity	This comment will be passed to colleagues in Highways and Strategic Transport. Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

parking on pavements during school drop off	Constant parking on pavements by people parking to drop off kids. It's dangerous for children crossing honor oak road as it adds another hidden variable.	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards.
Silver street development	Permission was granted for huge tower outside cluster looming over houses and conservation area	High quality design, Heritage, Housing	The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough.
Travis Perkins exit	Vans leaving Travis Perkins come up the ramp often driving quickly and using sat navs, then drive into the road without clear sight of cyclists and pedestrians.	Transport and connectivity	It is not within the scope of the Local Plan to address how drivers enter and exit this site.
Traffic	Winchfield Road - Fairlawn Park is used as a cut through for cars going to and from the high street and wanting to avoid the roundabout at bell green. They are often speeding and I have witnessed a number of collisions / accidents. It also creates high levels of noisy traffic throughout the night for a residential road - and in the daytime it is dangerous with a school nearby	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling The Local Plan includes proposals for the redevelopment of the Retail Park, which will include the reconfiguration of street layout and public realm.

Cut through	Winchfield Road and Fairlawn Park are rat runs/ cut through for cars to and from the high street. It is used at all hours and not only is it unfair to residents it is dangerous. There have been multiple accidents. There is also a primary school that has access on both streets and has the cars racing by. Also the GPS location for the industrial estate sends lorries via Fairlawn Park and they get stuff having to reverse out to Sydenham Road. Not only is this dangerous but has caused damage to cars in the process.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling This comment will be passed to colleagues in Highways and Strategic Transport
Malpas Road	This road is way to small to be classed as a B road!	Transport and connectivity	This comment will be passed to colleagues in Highways and Strategic Transport who address with road classification issues. It is not within the scope of the Local Plan to re-classify
Shardelous	The speed bumps on this road are useless. The vibrations caused as drivers fly over them is rattling the nearby houses!	Transport and connectivity	This comment will be passed to colleagues in Highways and Strategic Transport. Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Shardeloes	Truck parking lot!!! Really?!? The road towards Brockley Cross is literally a parking lot for all the tricks delivering to Howarths. Surely there should be better controls to manage this!	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards.

Car parking on Manwood Road pavements	Car parking on the pavement makes this a narrow stretch the walk and very difficult for pushchairs and wheelchair users.	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards.
Haseltine	Haseltine is an excellent school but surrounded by very busy roads with so many pollutants.	Transport and connectivity	The Local Plan aims to realise the long term reductions of energy use and carbon emissions in helping London become a zero carbon city by increasing the use of sustainable transport modes.
Ladywell Road	This road is extremely busy, especially during school run hours and when most people finish work. It's gridlocked from Adelaide Avenue down to Lewisham High Street. There is dangerous amounts of pollution being spewed out there every day. mount of pollution	Transport and connectivity	The Local Plan aims to realise the long term reductions of energy use and carbon emissions in helping London become a zero carbon city by increasing the use of sustainable transport modes.
Sydenham Hill/ Sydenham Rise	The roads are steep. with lots of traffic(more so with the proposed building in the area) I am fed up with cyclists calling for cycle lanes which are impracticable and will endanger everyone else. They could USE another routes or exercise in the Surrey Hills!	Transport and connectivity	It is not within the scope of the Local Plan to restrict the amount of cyclists who use a particular road. Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Sydenham Hill	Dangerous for pedestrians and cyclists.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Sydenham Hill/ Sydenham Rise	Busy road but cyclists think they are entitled to a cycle lane. Parking on the road slows down the traffic which is fast enough anyway. More 363 and 356 might reduce car use. Cyclists not stopping as they fly down this hill and Kirkdale .. should have license plates like cars so can be fined for speeding.	Transport and connectivity	It is not with the scope of the Local Plan to draft policy that could be used to restrict the use of bicycles. Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Hatcham Works site as it is at present with Sainsburys etc..	The only green space for many around..a more open site where you can breathe ..off the VERY TOXIC main road, with mature trees..useful facilities.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
New pedestrian and cycle link	Lack of pedestrian link from the centre of the Bellingham Area directly into the developing Bell Green area.	Transport and connectivity	Comment will be passed to colleagues in Highways and Strategic Transport The Local Plan aims to provide physical infrastructure needed to support growth and sustainable places, including through the use of CIL funding and developer contributions The Local Plan includes proposals for the redevelopment of the Retail Park, which will include the reconfiguration of street layout and public realm.
Lack of bus services	Lack of connectivity via buses	Transport and connectivity	The Local Plan will be used to aid the Council with working in partnership with bodies such as Central Govt, GLA, TFL, Network Rail and other stakeholders to increase transport capacity and improve

			transport infrastructure. It is not however within the scope of the Local Plan to influence bus or rail timetables.
Lack of transport	Transport black spot.	Transport and connectivity	The Local Plan will be used to aid the Council with working in partnership with bodies such as Central Govt, GLA, TFL, Network Rail and other stakeholders to increase transport capacity and improve transport infrastructure. It is not however within the scope of the Local Plan to influence bus or rail timetables.
Home park	Needs some TLC. Great community space but poorly maintained, broken playground etc.	Community Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
The bridge leisure centre	Great community space- good range of classes for young and old. Must be re-opened after covid. Such a loss to the community otherwise, just Kidz after school and breakfast club runs from there, family swimming, pitches, etc.	Community Infrastructure	The Local Plan aims to promote Healthy and Safe communities by addressing the wider detriments of physical and mental health. The Local Plan will also aim to ensure the delivery of high quality health (including leisure) facilities that meet the need of the local community. Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.

Home Park	It's a great space, with beautiful trees but run down with potholed paths and neglected play park.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Home Park		Green Infrastructure	No comment submitted
Speeding traffic and ineffective speed bumps	Traffic is encouraged to speed down this road without consequences. The speed bumps don't work.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling The officer however does not agree with the insinuation that traffic is encouraged to speed down any road within the borough.
Gilmore Road/Clarendon Rise Junction	Road layout encouraging dangerous driving.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling The officer however does not agree with the insinuation that traffic is encouraged to speed down any road within the borough.

Home Park	This park with its amazing avenue of trees and beautiful library could be so much nicer. It is so underused, lonely, shabby and sometimes menacing I live between Home Park and Mayow Park but never feel attracted to Home Park.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Loo block, Home Park	This disused loo block is Sydenham's shame and does a disservice to the whole area. Visitors to Sydenham arriving via Sydenham road are greeted by this rotting eyesore with its hideous Gentlemen sign. This repulsive structure attracts flytipping. It probably also attracts crime.	Green Infrastructure, Community Infrastructure	This comment will be passed to colleagues in Parks, Sport and Leisure as well as the Neighbourhood Community Safety Service. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
The Bridge Leisure Centre	The Bridge Leisure centre is a valuable asset to our community and must not be allowed to close.	Community Infrastructure	The Local Plan aims to promote Healthy and Safe communities by addressing the wider detriments of physical and mental health. The Local Plan will also aim to ensure the delivery of high quality health (including leisure) facilities that meet the need of the local community.. Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.
Beckenham Place Park	This park is beautiful.	Green Infrastructure	Noted

			The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Kirtley Road	There is always so much fly tipping at the end of this road, on the way to the health centre.	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement The prevention of flytipping is not within the scope of the Local Plan
Silverdale	Silverdale could be quite a nice road but it is so full of litter and flytipping.	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement The prevention of flytipping is not within the scope of the Local Plan
Corner of De Frene Rd and Perry Rise	There is so much fly tipping at this location.	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement The prevention of flytipping is not within the scope of the Local Plan
old co-op building	Such a shame that we could not have had a new medium sized supermarket such as the old co-op at this location. The co-op used to draw people to the high street.	Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities

Dhamecha cash 'n carry	I live in Barmeston Road and the back of my house looks directly at this enormous light industrial building. It was erected with no thought at all given to screening, green landscaping or for the fact it is surrounded by residential houses and backs on to the Ravensbourne River. The boundary (until many recent complaints to the manager) consisted of a very ugly steel fence with tatty, ripped black membrane semi-attached. There is now a six foot odd fence in front of it but this in no way near disguises it's huge height, or 24 hour floodlights which shine into our windows, disturb bats and river wildlife and the sheer bulk of the structure with no attempt at landscaping that blights our homes and gardens. It is incredible that planning was given with no conditions for tall trees bordering the car park /river and boundary with our gardens to be planted to help soften the endless noise of tannoy announcements, loaded trolleys on tarmac or vans with radios blaring and people shouting. There have been promises of landscape planting on the boundary but these have been broken. In line with the plans for the greening and better landscaping of Catford the improvement of this site - which is literally a few meters from the back gardens of many Barmeston	High quality design, Green Infrastructure, Sustainable design	Comment will be passed to colleagues in Planning Enforcement.

	Road properties and adjoins the River Ravensbourne, should be addressed.		
New Ravensbourne Retail Park plans	There is mention in the Plan of Barmeston Road (where I live) becoming something of an access road (although the wording is unclear) for the new retail offering. I wanted to clarify what that meant as I feel a	Economy and culture, Transport and connectivity	If an application for the site is submitted a delivery and servicing plan would need to be submitted as part of the application. As a residential road Barmeston Rd would not be used as the main servicing road, this would be reserved for the A21.

	small, quiet, residential road would be entirely unsuitable for that purpose?		
Home park sydenham	Because there is lots of litter and the playground needs revamping.	Community Infrastructure	Comment will be passed to colleagues in Parks, Sport and leisure and Environment Crime Enforcement. The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Pool River	The river and area between Catford and Sydenham is great for walks and cycling along the path. Yet, there is rubbish and the banks are overgrown, limiting access to the river. It feels like a forgotten location for people to visit and enjoy. I have seen some volunteers clearing the area, but more support and planning is needed.	Green Infrastructure, Transport and connectivity	The Local Plan aims to promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets – including trees, green spaces and water spaces and seek to enhance existing assets or make new provision through new development wherever opportunities arise.

Pomeroy Street	our health and safety is at risk	Transport and connectivity	It is not clear what the intent of the comment is.
Pavement parking.	Pavement parking here is an insult to pedestrians. These are huge houses, often with driveways, but you still allow drivers to use public space and a private garage.	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards.
Barmeston rd	There is no communal cycle storage on this street although I have repeated applications. Storing bikes safely when they are routinely stolen from gardens is very difficult - and that's if you're lucky enough to have a garden. If the council genuinely wants us to be less reliant on cars it needs to provide more kerbside cycle shelters.	Transport and connectivity, Green infrastructure	Comment will be passed to colleagues in Highways and Strategic Transport. The Council has a policy of increasing the availability of on street cycle storage in the Borough however the delivery of cycle storage is subject to available funding.
Trees	Unlike the heavily greened and tree lined conservation streets just across the A21 Barmeston road is a concrete wasteland. Many residents have said they would like trees in front of their homes but all but one have been told the sites are 'unsuitable' by the council for various odd reasons. Trees help with pollution and create better		If residents have been informed that the site is unsuitable for tree planting it would be outside the scope of the Local Plan to address this. The Local Plan however aims to promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets

	environments yet the council is effectively blocking this road from having any.		
Home Park	Thanks to those who cut the grass regularly, but the litter left is dangerous to pets and small children		Comment will be passed to colleagues in Environment Crime Enforcement
Barmeston road	Barmeston road looks shabby and neglected. It would really benefit from tree planting and is often a site for fly tipping especially opposite the post office and on the corner of Charlsley road and Barmeston road. On some days the road is clogged with post office vehicles making access for residents difficult.	Transport and connectivity, Community Infrastructure, Green Infrastructure	Comment will be passed to colleagues in Highways and Strategic Transport. The Local Plan aims to promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets

Beckenham Place Park	There has been a huge investment in the park which meets some local need (bearing in mind it is on the Bromley boarder). The council has stated that more even more funding and development is going in to the park despite rejecting many other green space enhancement requests due to lack of funding. There are a lot of other green spaces and not just open parks that need attention - this is starting to look like a vanity project that isn't benefitting a lot of Lewisham residents. Share the funding across the borough please and take in to account high pollution areas, density of schools and threatened green land - these could really use a share of the money that is allocated to Beckenham. This is a labour borough after all - principals of equality should be in all funding decisions.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Illegal parking	Consistent illegal parking (inc widespread misuse of blue badges) on the double yellows along Adenmore Road, restricting access and putting residents at risk.	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards. Parking enforcement is not within the scope of the Local Plan
Albion green	Lovely small nature oasis hidden away	Green Infrastructure	Noted

			The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Springbank Road	Keen to see the area developed. Want to make sure any scheme is sympathetic to the surrounding area... no hi-rises please!!	High quality design, Housing, Sustainable design	The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough The Local Plan also advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Parking.	Unrestricted parking bay means residents can't often park outside their own home (I have to park three roads away). Meanwhile a local garage uses the space to park cars being worked on. Seems a bit wrong frankly. The bays are effectively supporting a small business at the expense of residents paying hundreds of pounds for parking every year	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards. Parking enforcement is outside of the scope of the Local Plan
Street and conversion of shops to nothinfnuseful	This area has an opportunity to be a nice local centre with a couple of cafés and restaurants rather than ugly conversions to residential.	High quality design, Housing, Sustainable design, Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities

Ha'penny hatch.	Love this site with a bridge over the Creek from where I've seen a seal with my children! Never feels unsafe here and is always busy (have never heard about 'muggings' there). The ever changing graffiti art looks beautiful and is a really positive sight as the previous semi-legitimate wall for graffiti in Brookmill park was knocked down years ago.	Community Infrastructure	Comment will be passed to colleagues in the Neighbourhood Community Safety Service. The Local Plan aims to create Healthy and Safe communities by addressing the detriments of physical and mental health. The Local Plan also aims to provide physical infrastructure needed to support growth and sustainable places, including through the use of CIL funding and developer contributions
Eastern Road	There was a nice area of undergrowth opposite the entrance to Hilly Fields woods which has now tragically been destroyed. This was previously a great 'wild' patch full of birdsong and where I would take my children to pick blackberries. Trees have been cut down and made into insect loggeries in a pathetic attempt to mitigate the destruction of this small habitat. Apparently flower beds are going to be planted. It's such a pit that this small wild area is going to become another ecologically sterile wasteland!	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Bricklayer cemetery	Love Brockley cemetery which is a serene haven of quiet and an important place for wildlife as it is not messed around with too much. There is no problem with litter and no intrusions of cafes or shops.	Green Infrastructure, Community Infrastructure	Comment will be passed to colleagues in Bereavement Services

Pine Tree Way street name.	When the new housing was built on this site the road was named after the pine trees, on the opposite bank of the river, that were used to screen the depo on the other side.	Green Infrastructure, Sustainable design, Housing, High quality design	It is not within the scope of the Local Plan to review the names of specific roads
Smead Way street name.	When the new housing was built on the former Sundermead Estate this road was named after it. Unfortunately the developers appear to have looked at a map where Sundermead had been abbreviated to 'S'mead' and named the street Smead Way.	High quality design	It is not within the scope of the Local Plan to review the names of specific roads
Waterway Avenue street name	The name of the street is generic and sounds like it was picked from a property developers brochure.	High quality design	It is not within the scope of the Local Plan to review the names of specific roads
Hilly Fields woods	It's great that this is a nature area but is very heavily used and dog walkers seem to think this area is a toilet for their dogs where they don't need to clean up.	Green Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement and Parks, Sport and Leisure.
No Barmeston Road bike shelters	There are no bike shelters here and cycling is a key way to get around in this area. It's essential that we get somewhere to store our bikes here.	Transport and connectivity	Comment will be passed to colleagues in Highways and Strategic Transport. The Council has a policy of increasing the availability of on street cycle storage in the Borough however the delivery of cycle storage is subject to available funding.

Trees and greenery	Barmeston Road could be a beautiful street with its many grand, period houses. There is a lack of greenery here though and we really need trees to be planted, to create a pleasant, leafy area.	Green Infrastructure	Comment will be passed to colleagues in Parks, Sport and Leisure. The Local Plan aims to promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets – including trees, green spaces and water spaces and seek to enhance existing assets or make new provision through new development wherever opportunities arise.
Barmeston Rd and Ravensbourne Retail Park	I have read all the plans regarding the new Ravensbourne Retail Park which sounds good but there is the suggestion that Barmeston Road could become some kind of service road. This would be a disaster for the road as it is a quiet residential area with period properties and great potential for regeneration.	Transport and connectivity	If an application for the site is submitted a delivery and servicing plan would need to be submitted as part of the application. As a residential road Barmeston Rd would not be used as the main servicing road, this would be reserved for the A21.
Barmeston Road part of conservation area	The map showing the large conservation area stops short of Barmeston Road. I am concerned that this is because there are plans for it to become a service area for the Ravensbourne Retail Park.	Heritage, Economy and culture	If an application for the site is submitted a delivery and servicing plan would need to be submitted as part of the application. As a residential road Barmeston Rd would not be used as the main servicing road, this would be reserved for the A21.
Top of Upper Brockley Road	Inadequate bike stands which would otherwise be useful for parents dropping children off at Myatt Gardens.	Transport and connectivity	Comment will be passed to colleagues in Highways and Strategic Transport.
Mews behind houses	It's a badly kept area with lots of rubbish which is a pity as it could be a nice lane to wonder down like the mews around the other end of Brockley.	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement The prevention of flytipping or littering is not within the scope of the Local Plan

Courtrai Road	The Scout Hut and top of the road have become a popular site for dumping in the street but whoever owns the scout hut land hasn't been locking after it.	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement The prevention of flytipping is not within the scope of the Local Plan
Retail Parades on Springbank Road	Streetscape and public realm need investment and enhancement.	High quality design, Sustainable design	The Local Plan also aims to provide physical infrastructure needed to support growth and sustainable places, including through the use of CIL funding and developer contributions

Railway Corridor boundary with Springbank Road	Boundary buffer with Springbank Road needs enhancement.	Green Infrastructure	Comment will be passed to colleagues in Parks, Sport and Leisure. The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.
South of Lewisham Library - shop frontages and street landscape (too much shabby retail)	Along this road, many of the shops seem to do little business. Most of the shop fronts are tatty or gawdy (with ugly Lycamobile signs or similar) and the area looks depressed as a result. Some of the retail premises trade out out of attractive old properties but the buildings aren't visible because they have one storey extensions at the front (e.g. just south of the library on the opposite side of the road). In addition, the road is polluted and is too narrow at many points to enable cycle lanes	Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities The Local Plan also aims to realise the long term reductions of energy use and carbon emissions in helping London become a zero carbon city by increasing the use of sustainable transport modes
Wild area between Adamsrill Road and Dr Green Roas	The amount of wildlife I see, particularly house sparrows and creatures	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.
Open Space/ former Allotments between Adamsrill Road and DeFrene Road	This site has not been touched for many many years and is a heaven for wildlife.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.

Wild land	The land between Adamsrill and De Frene is something that is really special to the local community and especially the kids who like watching and listening to the wildlife. Adults do too. It's a perfect home for an array of creatures and species.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.
A little green space on Montrose Way	There's a green space here totally neglected, dirty, even dangerous, with a broken bench.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.
Open space	At the moment it's inaccessible and overgrown. It used to be allotments but is now not being used at all. On the upside there is a lot of wildlife out there including a flock of sparrows and some starlings, and possibly even bats!	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.
Kirkdale thorpewood	Very dangerous crossing.	Transport and connectivity	This comment will be passed to colleagues in Highways Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Dangerous road crossing	There is no pedistrian crossing to cross Pomeroy Street here. It is therefore very difficult to cross safely due to traffic coming from so many directions. This is the main route to supermarkets for many pedestrians and hence should be made safer. It is also dangerous for cyclists - cars turning left here don't see cyclists and I have seen multiple instances here involving cars and cyclists. This road feels polluted and dirty and is not a nice place to walk.	Transport and connectivity	This comment will be passed to colleagues in Highways and Strategic Transport Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Junction of Houston Road and Perry Hill	Very difficult to cross the road to get to the bus stop & waterlink way. Cars speed up Perry Hill and use these roads as cut throughs for the south circular	Transport and connectivity	This comment will be passed to colleagues in Highways and Strategic Transport Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Pathway up to the bridge	There is always a puddle underneath this tree and doesn't seem like it is draining properly despite attempts to improve it	Green Infrastructure, Sustainable design	Comment will be passed to colleagues in Parks, Sport and Leisure

Continuation of waterlink way through Wickes and Halfords	Waterlink way has been a lifeline for many during the lockdown and is used by so many local people.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces

Gellatly Road SE14 5TT. This road is designated a B road and is too narrow for the traffic it has to cope with. It is difficult to cross the road especially with vehicles exceeding the 20 mph limit when they are not stationary with idling engines. Our 6 year old has to cope crossing this road to get to school. It should not be a B road. Traffic should be re routed down main roads and not be directed through this residential area.	Because it is difficult negotiating this road with the large amount of traffic on this narrow road	Transport and connectivity	This comment will be passed to colleagues in Highways and Strategic Transport who address with road classification issues. It is not within the scope of the Local Plan to re-classify roads.
Open space between Adamsrill and De Frene Road	The space provides a haven for wildlife. We need more spaces like this for environment.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's

			network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Gillian Street	This small road is often used as a rat run for people trying to avoid the lights. Because of the nature of the road cars frequently drive in excess of the 20mph speed limit. This means that crossing the the road on the corner of Vicars Hill and Gillian Street is very dangerous - this is exacerbated by the number of vehicles which park on the double yellow line. I have seen too many near misses - especially with young children.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling. Comment will be passed to colleagues in Highways and Strategic Transport
	Great selection of independent businesses.	Economy and culture	Noted but location not disclosed
Ladywell Fields	This is one of the best parks in Lewisham. Great for relaxing and enjoying a bit of peace amongst the bustle.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

A20 by Lewisham Gateway Phase 2 through to Loampit Vale.	This part of the road is really troubling as a cyclist. The layout of the roads seem to encourage people to speed around corners.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.

The entirety of the shopping area at Bell Green.	Lewisham seems to be cryptic in what it is planning -again. Most people will turn up in their cars and not be aware of the proposals posted on the lamp posts primarily on the lower use service road/bus loop. The idiotic scheme put forward by the Sydenham Society (ca2018) appears resurrected - effectively creating a sink estate where the retail outlets are replaced with blocks of flats. The promises that shops will return has low credibility - the street market in Catford is evidential after 'restyling' As they are, the retail shops on the Bell Green estate, Sainsbury's especially, are very useful. They are conveniently located and easily accessed. Conversely, Sydenham high road has been made difficult to use as has been Catford itself. Both are shadows of their former selves (one doubts that Catford will be improved by the ULEZ expansion along with the proposed re-routing of the S.Circular; articulated lorries will almost certainly cause problem on tight turns). As for the car parks being car friendly, one hopes that cars parks are just that. What could be dealt with is posting (a) sensible speed limit(s) and creating elevated	Transport and connectivity, Economy and culture, Housing	The Local Plan includes proposals for the redevelopment of the Retail Park, which will include the reconfiguration of street layout and public realm.

	pedestrian walkways. Additionally, the traffic light phasing on the main roads peripheral might well be altered so that the temptation to use the Sainsburys car park as a cut through is diminished.		

Cars parking on the footpath	Cars park on the footpath here often making it difficult for people to pass. The road is really ride here so there should be no reasons whatsoever for cars to encroach on pedestrian space.	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards.
A2 at the intersection of Deptford High Street	This is an area that has a lot of pedestrian traffic and vehicular traffic. The speed at which traffic moves along the A2 is too fast to make it safe for other users. Moreover there is a crossing that is outside Addey and Stanhope School where pedestrians need to wait for a very long time on a narrow footpath to cross.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling The Local Plan also conforms to the London Plan car parking standards. CPZs outside the scope of the Local Plan
Small site opportunity	Under used surface parking	Transport and connectivity	Noted
Add to Lewisham Link	This is London cycle network route 22 and provides a well used link from Catford to central London. It enters the borough at Eddystone Road, turns on Buckthorne Rd then Bartram Road before jigging across Brockley Road and down Sevenoaks and then Ewhurst Rds before entering Ladywell Park	Transport and connectivity	Noted.
Small site opportunity	MOT garage and back yards of commercial buildings that present an untidy face to Stondon Park.	High quality design, Housing,	Noted We are not adding site allocations at this stage of the Plan process. This site may be considered during the plan review in due course.

		Sustainable design	
Tennis courts	Run down	High quality design	Comment to be passed to colleagues in Parks, Sport and Leisure
Tennis courts	Run down	High quality design	Comment to be passed to colleagues in Parks, Sport and Leisure

Coop	If understood correctly, it looks like the site is earmarked to be redeveloped into flats. This would be of huge detriment to the local community. Firstly, a majority of the customers walk to this site, minimising the carbon footprint of shopping for groceries in the area. Secondly, the only realistic alternative would be the Sainsbury's by Grove park station. This leaves the older community of Downham travelling much further for the regular shopping, plus it's a more expensive shop when reviewed on an average per-basket review. The store is heavily involved in the local community, in addition to being a local employer. The staff know many of the regular customers, including the older shoppers in which the familiarity and friendliness of the staff supports their well-being in the area. Plus the store is involved in local initiatives with children, has a thriving notice board and proved itself an invaluable hub during Covid. There is already council land nearby which could be redeveloped without removing a major asset to the area. I am certainly not alone in my concern for the proposed plans and opposition is building. I work in public consultation and on viewing the placemaking strategy, and	High quality design, Housing, Sustainable design, Community Infrastructure	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities. The consultation for the Local Plan Reg 18 document was extensive in both promotion and activity. Unfortunately the Council were unable to promote the consultation through physical means and also were unable to hold physical workshops due to the Covid-19 restrictions that were in place at the time.

	the method of commenting on specific areas of development, I am concerned that those most affected will be either unable to contribute to this conversation, or completely unaware of the plans altogether.		

Small site opportunity	Under used garages with surface parking which could be replaced with two/three storey houses.	Housing, High quality design	Noted We are not adding site allocations at this stage of the Plan process. This site may be considered during the plan review in due course.
Small site opportunity	Two storey mixed use commercial building, postwar.		Noted We are not adding site allocations at this stage of the Plan process. This site may be considered during the plan review in due course.
Co op redevelopment	This is my local shop and it may be redeveloped into flats. I'm really worried that I have no other suitable shop local as I have no car and can only walk short distances. The small shops on the high street are terrible and cannot service my needs. It is also a social outing for me as I live alone. I am friends with many of the staff in the co op and they are a good employer in the area. I also think they contribute to the area with their fundraising. Do not replace it with a block of flats catering to low income people only and remove this hub of local activity. My friends are also upset that a community pub is being removed and not replaced, it really removes the soul of an area.	Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities

Alley	fly tipping hot spot. Dangerous feeling, dark, depressing, scary, uneven footpath down this alley. Used by me, the local people and children from the schools, never feels safe.	Community Infrastructure	Comment will be passed to colleagues in the Neighbourhood Community Safety Service and the Environment Crime Enforcement The prevention of flytipping is not within the scope of the Local Plan
Ivorydown, congested and unwelcome feeling	The traffic from the schools particularly at the Launcelot end of the street is awful. Please fix this by making more traffic patrols of the area during school starting and finishing times to discourage parents double parking. I've nearly been hit by cars here due to people driving on the footpath. The street itself needs a face lift with new footpaths like on downham way, as well as requires trees planting to improve the air quality created by all the idling engines.	Transport and connectivity	This comment will be passed to colleagues in Highways and Strategic Transport. The Local Plan conforms to the London Plan car parking standards.
Parade of shops needs a facelift	This sad and depressing parade of shops could be the lifeblood of grove park/downham. Conveniently located opposite the station it is a shame it is dirty and in such a poor state.	Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Bell Green Lane / Kent House Lane	I live on the road	N/A	N/A

Space behind Adamsrill, Niederwald, De Frene and Fairwyn Roads.	Currently an extremely overgrown and wasted space. Home to some wild animals but also vermin.	Green Infrastructure	Comment to be passed to colleagues in Parks, Sports and Leisure.
Home park	It has huge potential and is so neglected versus Mayow park in upper Sydenham.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Dangerous speeding	Cars use Tannsfeld as a short cut to avoid the lights at the end of Newlands Park. Many many cars break the speed limit and the blind corner on Tannsfeld opposite Alexandra Rec is incredibly dangerous. It's only a matter of time until a child gets hit by a car here.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Determining speed restrictions are not within the scope of the local plan
Queensthorpe / Earlsthorpe	Flytipping behind Earlsthorpe Road has been going on for years House next to Queensthorpe Houses has been squatted for years and Council has refused development that would greatly	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement The prevention of flytipping is not within the scope of the Local Plan

	improve the place and provide family housing		
Parking of large vans	Large vans are parked at the upper end of Dukesthorpe obstructing view and causing safety issues to be able to turn onto Bishopsthorpe Speeding vehicles from nearby Audi garage has not been addressed	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards.
Torridon Road	Noisy, traffic, speeding drivers, poor air quality on what should be a quiet residential street.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
	It's a great shortcut and I definitely wouldn't want it to be closed - but it's quite scary to walk down it at night. It's poorly lit and could perhaps benefit from cctv put up high so that it can't be vandalized. With a sign saying this area is on camera...	Transport and connectivity	Comment will be passed to colleagues in the Neighbourhood Community Safety Service No area selected
Junction		Transport and connectivity	No comment made

Hermes Depot at Ashgrove Estate	Frequency of lorries 12ton+ through day & night.. Noise, pollution & nuisance. Hermes private drivers waiting on the carriageway - parking on double yellows, blocking crossovers & gate access and leaving engines idling.	Transport and connectivity	Comment to be passed to the enforcement team. This is an issue regarding the conditions agreed on the planning application and is not within the scope of the Local Plan
Home park	Could be improved the park feels unloved	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Old Kent Road	This street should be a much better high street. Empty shop fronts and losing the White Hart makes this feel like it's going under.	Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Green space between Adamsrill and De Frene Road	Much needed green space for local wildlife to flourish.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

Bell Green shops and surrounding busy roads	The pedestrian access to Bell Green is appalling. I regularly walk there with my young children and the pollution they are exposed to on the journey is horrible. There is limited pedestrian access into the (unnecessarily large) car park.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling. The Local Plan also aims to realise the long term reductions of energy use and carbon emissions in helping London become a zero carbon city by increasing the use of sustainable transport modes. The Local Plan includes proposals for the redevelopment of the Retail Park, which will include the reconfiguration of street layout and public realm.
Mayow Park playground	We love Mayow Park and the value it gives to the local community but the children's playground is long overdue an upgrade	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Forster Memorial Park	The park requires toilet facilities and better lighting.	Community Infrastructure	The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

Broadfield Road	This road has become a rat-run route. Cars speed up and down to access the South Circular, particularly during peak times. We have a nursery on our street so this is particularly dangerous as there are babies and toddlers around at the same time every morning, most of whom are on the pavement as their parents walk them. Speed humps required. Or cameras or both.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling. This comment will be passed to colleagues in Highways and Strategic Transport.
Dowanhill Road between Broadfield and Wellmeadow Roads	Fly tipping hotspot. Please install signs or cameras or better lighting or all of the above.	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement The prevention of flytipping is not within the scope of the Local Plan
Honor Oak Park	Dominated by noisy, polluting and dangerous through traffic.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Devonshire Road	Ruined by rat run traffic.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Honor Oak Road	Dangerously narrow pavements. Road and area dominated by noisy, dangerous and polluting vehicles, 24/7.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Hengrave Road	Dominated by traffic.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Parade of shops in Honor Oak Park	Ruined by polluting cars, lorries and vans.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
High Street & Market	The market is incredibly scruffy with mismatched tarpaulins/covers. If they all matched say in Lewisham Colours turquoise/white stripes it would look so much better. Most Councils in London have already recognised this. The High Street itself looks like something from Eastern Europe will poor shops fronts, scruffy little phone shops and the most appalling paving.	Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities Officers would like to highlight that some of this comment is derogatory and will not be considered.
Stondon Park	Dominated by dangerous, polluting through traffic.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Hilly fields - Adelaide Ave/Eastern Road entrance	The park has been great place to go for a walk and walk the dog (we always clean up after our dog!). However, there is no street light between the Adelaide avenue / Eastern road entrance and the top of the hill. As a result it feels unsafe to walk through the part after sunset and we have been yelled at by a drunk person walking in	Green Infrastructure	Comment will be passed to colleagues in the Neighbourhood Community Safety Service The Local Plan aims to create Healthy and Safe communities by creating safer neighbourhoods and improve perceptions of safety by ensuring the built environment comprises of welcoming spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

	the park when we did walk through this route in the evening once.		
Ladywell village	I like small independent shops.	Economy and culture	Noted
Sainsburys Lee Green	I don't think Sainsburys supermarket in Lee should be altered in any way! Its a integral supermarket for local people and should be preserved. Local people cannot function without it planned flats will disrupt shopping which is a vital resource.	Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities. The Local Plan supports the regeneration of the Lee Green district.

Adamsrill nature reserve	I love birds and wild life. So does my primary school aged daughter. I believe this site is unique and could be used to support the mental health, ecological diversity, and an accessible open green space in this ward. There is an obvious and urgent need for this right now. I love the peace and tranquility of the space and understand as the parks are full to bursting atm we need more green space now more than ever. There are demonstrable mental health benefits to wild nature space.	Green Infrastructure	The Local Plan aims to promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets – including trees, green spaces and water spaces and seek to enhance existing assets or make new provision through new development wherever opportunities arise.

Summerfield Street sign damage	The Summerfield Street sign looks like a car has hit it - it is buckled from the centre.	Transport and connectivity	The Local Plan does not have the scope to manage the maintenance of road signs. This is the responsibility of TFL.
Open space between Adamsrill & De Frene Rd	Developers are circling this space for building more homes. Not only is this space completely unsuitable for development, but what is being done to support the local infrastructure with all these new homes being built? Are any of these homes affordable? Will there be more schools, doctors, parking etc etc?	High quality design, Housing	The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places
Disused green space between De Frene and Adamsrill	This space is a sanctuary for birds and wildlife in an area of small manicured gardens that see the wide variety of birds because they nest and feed in this space.	Green Infrastructure	The Local Plan aims to promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets – including trees, green spaces and water spaces and seek to enhance existing assets or make new provision through new development wherever opportunities arise.

Tiger junction	This is a very badly designed crossing for pedestrians and those with young children. Because of the zig zag way the crossing points are designed its very hard to be able to make it across in one go with the result that it could take you four changes of lights to get across to the diagonally opposite side. In reality many of us have to cross without the green man which is hardly the example we want to set for children. I realise its a busy junction but surely something more pedestrian friendly could have been created when the redesign was done? It feels incredibly user-hostile and goes against the message we want to send about walking and healthy lifestyles.	Transport and connectivity	This comment will be passed to colleagues in Highways and Strategic Transport Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
School street scheme	The closure of the road outside Adamsrill school makes the road feel so much safer for kids and parents. Plus it allows for better social distancing	Transport and connectivity	Comment refers mostly to restrictions that were in place during the Covid-19 lockdown
Deptford Creek	Need to use the creek for formal residential moorings throughout.	Housing	Moorings within the Thames is not within the scope of the Local Plan.
Telegraph Hill	It's a great area, well cared for, good facilities for the elderly, nice parks and most of it is a conservation area so all the roads are pleasant to walk around	Heritage, Community Infrastructure	Noted

Miserable parade of shops, no crossings, tarmac central reservation	This stretch of Southend Lane is horrible	Transport and connectivity, Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Bell Green Retail Park	I come here on foot - it is so awful. Please keep the idea of redeveloping this site into a mixed use development with lots of shops and cafes. As long as the buildings are not too tall then it could be like the sainsbury's at Catford station. P	Housing, High quality design, Economy and culture	The Local Plan includes proposals for the redevelopment of the Retail Park, which will include the reconfiguration of street layout and public realm.
poor connection / crossing at the end of River View Walk	dangerous, unpleasant	Transport and connectivity	Comment will be passed to colleagues in Highways and Strategic Transport.
poorly connected train station	horrible horrible station, unpleasant to approach from all directions. Poor connections to bus routes	Transport and connectivity	The Local Plan will be used to aid the Council with working in partnership with bodies such as Central Govt, GLA, TFL, Network Rail and other stakeholders to increase transport capacity and improve transport infrastructure. It is not however within the scope of the Local Plan to influence bus or rail timetables.

Local pool and leisure facilities	If the council is closing the Bridge because the building is inherently problematic, then please commit to rebuild the centre as a new flagship design and asset for our area	Community Infrastructure	The Local Plan aims to promote Healthy and Safe communities by addressing the wider detriments of physical and mental health. The Local Plan will also aim to ensure the delivery of high quality health (including leisure) facilities that meet the need of the local community..
Lack of footbridge over railway	It seems there is a footbridge missing between honor oak and forest hill. There are some lovely walks around this area that would greatly improve this.	Transport and connectivity	The Local Plan will be used to aid the Council with working in partnership with bodies such as Central Govt, GLA, TFL, Network Rail and other stakeholders to increase transport capacity and improve transport infrastructure. It is not however within the scope of the Local Plan to influence bus or rail timetables
Brockley and Ladywell Cemeteries	The Cemeteries are great places for reflection and contemplation, and for studying plants and wildlife.	Green Infrastructure, Community Infrastructure	Noted
se26 4dd	Air pollution from the is a large busy road with homes very close to this road, creating a poor environment to live - air pollution from cars is dangerous to health in many ways.	Transport and connectivity	The Local Plan aims to realise the long term reductions of energy use and carbon emissions in helping London become a zero carbon city by increasing the use of sustainable transport modes

Bell Green retail park - the area between Perry Hill and the river	Ugly, polluted air, unpleasant to walk through	Transport and connectivity	The Local Plan aims to realise the long term reductions of energy use and carbon emissions in helping London become a zero carbon city by increasing the use of sustainable transport modes The Local Plan includes proposals for the redevelopment of the Retail Park, which will include the reconfiguration of street layout and public realm.
Former scout hut and land near corner of Courtrai Rd in Crofton Park	This neglected land could be converted into a nature reserve, perhaps with visitor centre attached giving information on the local flora and fauna, a valuable extra green space and potential educational resource, in Lewisham council's mission to do its bit to raise awareness of the issue of climate change and actively contribute towards encouraging wildlife, wildflowers, bees etc.	Community Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space. The Local Plan aims to promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets – including trees, green spaces and water spaces and seek to enhance existing assets or make new provision through new development wherever opportunities arise
Bradgate Rd, Aldi Site	Happen to hear that there is consultation out to build 119 residential units on this site. How tall will this proposed building be. I live on Bradgate Rd and am very concerned about the shadow that this proposed building will cast on my home.	Housing, High quality design	Officers will not comment on specific planning applications. Opportunities will be given to comment on specific developments once a planning application has been submitted

Sainsbury's and the retail park	It's extremely useful to have a large Sainsbury's and the retail park - bigger supermarkets are generally cheaper than their Local/Metro/Express counterparts as well as having a better range of products. The shops in the retail park are really useful - as a non-car owner, being able to walk/get the bus to B&Q is incredibly helpful! I'm very concerned at the proposal to put housing on this site, with no consideration for where the residents will shop, or any other relevant infrastructure (GPs, schools, dentists) as well as depriving local residents of useful and well-used shops. Particularly when there is a drive to reduce car use, removing a retail park which is accessible by foot, bike and bus seems incredibly short-sighted.	Economy and culture, Community Infrastructure	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Bridge on the Waterlink Way	Even after repair, it's not good to cycle over and isn't even ideal for walking! It needs to be properly repaired.	Transport and connectivity	Comment to be passed to colleagues in Highways and Strategic Transport. The Local Plan also aims to provide physical infrastructure needed to support growth and sustainable places, including through the use of CIL funding and developer contributions

Maintaining wildlife - Hilly Fields	loving the reinstatement and management of the park - great to see the mass of recent brambles to be kept at bay.	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Hilly Fields	It is a rare spot to experience nature and wildlife.	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Hilly fields drainage!	When heavy rainfall the water runs off park taking sediment with it, the ground is heavily mown and trampled so poor retention.	Sustainable design	Comment will be passed to colleagues in Parks, Sport and Leisure. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Hilly field Crescent crossover needed.	Traffic is still coming round corner with poor visibility- need to put crossover for pedestrians where it is needed.. not 8m out of way of corner.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Hilly Fields	It is a lovely park but replacing some of trees lost over years along boundary would be good.	Green Infrastructure	This comment will be passed to colleagues in Parks, Sport and Leisure The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Brookmill Park	Close to wildlife and the pond is beautiful and river .	Green Infrastructure	Noted

			The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Mountsfield park	Love the park, great work from volunteers.	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Gordonbrock	Public sports area- ie tarmac court should be made accessible at weekends and evenings.	Community Infrastructure	It is not within the scope of the Local Plan to determine the opening hours of leisure facilities This comment will be passed to colleagues in Parks, Sport and Leisure
Waterline way	Difficult crossing between two areas of waterline way. Need a stronger cycle and pedestrian link	Transport and connectivity	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces
Mews	Gate makes it inhospitable, spoilt green route with tarmac.	Green Infrastructure	Comment will be passed to colleagues in Parks, Sport and Leisure.
Memorial Gardens	Because you still bother to do crazy bedding. It is good to have diversity in parks, some wild, some formal and some floral.	Green Infrastructure	Comment will be passed to colleagues in Parks, Sport and Leisure. It is not within the scope of the Local Plan to determine flower types within parks.
Catford	Because it is up beat and vibrant with interesting shops.	Economy and culture	Noted The Local Plan commits to the further investment of Catford through the Catford Framework.

Deptford High street	Vibrant interesting and like ships and market	Economy and culture	Noted
Bridge leisure centre	Great as it is somewhere you can play badminton	Community Infrastructure	The Local Plan aims to promote Healthy and Safe communities by addressing the wider detriments of physical and mental health. The Local Plan will also aim to ensure the delivery of high quality health (including leisure) facilities that meet the need of the local community Any proposal for the redevelopment of community infrastructure will be assessed against existing London Plan and Local Plan policies and draft Policy CI1 Safeguarding and securing community infrastructure.
Ravensbourne Park	Lovely quiet park	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Ladywell fields	Part of a lovely walk.	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Roads generally need suds stepped out planting beds to slow traffic and improve drainage.	Traffic is too fast and need more trees.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Brockley and ladywell cemetery	Because you can't walk through the cemetery.	Green Infrastructure	Comment will be passed to colleagues in Bereavement Services
Pearson's Avenue	At the end of school when Addeys is being dismissed cars sometimes drive too fast around this corner	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Ladywell Fields Park	The park doesn't feel very safe when it's dark due to dimly lit paths, a lack of patrols and motorbikes racing through the park in the evenings. The park is used by walkers, people coming out of the station and those using the tennis courts and it feels very unsafe walking around the park when it's dark. Toilet facilities are very limited and restricted to cafe opening times, so after 4pm there are no toilet facilities (tennis courts are open until 9pm).	Green Infrastructure, Community Infrastructure	Comment will be passed to colleagues in the Neighbourhood Community Safety Service and Parks, Sport and Leisure The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Mountsfield park	Lovely open space and like the new cafe very much.	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
ladywell fields	it's a wonderful open park	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy

Ladywell fields	This us a fantastic space and the community tennis initiative is v welcome but the facilities and safety leave a lot to be desired.	Community Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Hilly Fields	Wonderful park with spectacular views and great variety of space.	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Near the village, maybe the heath itself	It's a great place.	Green Infrastructure	Noted
Ladywell fields	Park can feel unsafe in the dark	Community Infrastructure	Comment will be passed to colleagues in the Neighbourhood Community Safety Service.
Road Gateway	It is a dreadful layout, for everyone, pedestrians , cycles and cars. Hard to know which lane to be in no cycle route or easy way through station.. cars caught between lights on junction.	Transport and connectivity	Comment will be passed to colleagues in Highways and Strategic Transport.
Gardens along high street.	They are lovely green with great trees.	Green Infrastructure	Noted
Lewisham Park	Like the variety of parks, this one has some lovely trees and plants.	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy

Ladywell park	The park is very good but it could be excellent. Really appreciate the opportunity to have a say.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Ladywell fields	This is a very good park but it could be excellent	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Make a quiet route for cyclists.	Cars trace down and cut through, it has potential for 'country lane feel and will help keep cemetery quieter.. can link across towards Ladywell fields.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Grove Park (but also borough wide)	There is a complete lack of cycle lanes in Grove Park. The area has been under constructions over and over again, and never a safe cycle lane put in. The whole area needs to make cycling safely accessible.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Corner of Senlac Road and Exford Road (traveling in direction of Winn Road)	50% of cars driver over this corner of the pavement through laziness. This should have pinch points at this junction or at least metal bollards on the corners. Many children cross at this junction as it is en route to Coopers Lane Primary School.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Winn Road	Cars travel at a minimum of 50% over the speed limit. There are regular accidents and bollards destroyed. This is a route for children to walk to school or visit the park.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
downham Community Centre Wesley Halls	I look forward to meeting people, learn new things and keep active	Community Infrastructure	Noted The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions

Sydenham Hill/ Sydenham Rise	There is a proposal to divert cycle lanes through the Sydenham Woods. This is outrageous.The Woods will be degraded by hard core paths, wildlife and plants disturbed. Obviously a plan to appease the cycling lobby ..who dont stop for traffic lights or people crossing roads when going downhill and now want to treat the Woods conservation area like a Park.	Transport and connectivity	Sydenham Hill Wood is situated in the Borough of Southwark. Any plans regarding Sydenham Hill Woods cannot be considered by the Lewisham Local Plan
Platform 4 closure	Whoever has approved the 'Platform 4' closure, should be held criminally responsible. I know this has happened a long while back, but it is even more important now - to resolve this. Thousands of new commuters moved to the area. The overcrowding is a constant health & safety risk. I've been shoved around, pushed, tripped, fell, you name it.. Additionally, in Covid times - presents additional risks.	Transport and connectivity	It is not the scope of the Local Plan to determine which station platforms stay open or closed.
Springbank Road	The recycling facilities in Hither Green are none existent. I need a car to drive to the recycling centre in New Cross to recycle ♻ textiles and fluorescent light bulbs. No investment in Hither Green at all	Community Infrastructure	The Local Plan aims to manage waste responsibly by prioritising the implementation of the most sustainable options in the waste hierarchy and safeguarding appropriate sites for the Borough to meet its strategic waste requirements.

Retail park	This retail park is littered with rubbish, which is such a shame in the middle of the Waterlink Way which is a really peaceful green space so close to the middle of Catford. I'm concerned this will pollute the rivers and be harmful to wildlife.	Sustainable design, Green Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement
Beckenham Place Park	We are so lucky to have this huge green space for all to enjoy.	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Bell Green retail park	The pedestrian access to the retail park from all sides is terrible - the main routes are through the car park, where I've had several near misses as a pedestrian. Everything is designed for cars, without even basic pavements or pedestrian routes. This is not only a problem for shoppers, but it is a main route the the Waterlink Way - it's almost not worth accessing green space if you have to walk through a dangerous, dirty and polluted area first.		Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling The Local Plan includes proposals for the redevelopment of the Retail Park, which will include the reconfiguration of street layout and public realm.

Lower half of Perry Rise	This is a highly congested route where cars speed down the hill. People rarely stick to the 20 limit! It's extremely difficult and dangerous for parents and children at Brent Knoll school to cross. Serious congestion also makes parking difficult. Our car was written off outside our home by a driver trying to park quickly on the busy road. We've also witnessed cars crashing into parked cars at speed on the hill. Luckily neither of these incidents involved people - I worry with increased development at Bell Green this would no longer be the case.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling. This comment will be passed to colleagues in Highways and Strategic Transport
Sydenham Hill SE26	It's a very beautiful ridge, full of Nature and wonderful views over London. The Sydenham Hill Woods, Hillcrest Woods and down to Sydenham Wells Park with it wonderful birdlife, bats and Nature. The views up to the Ridge are wonderful and green full of lush trees that should not be spoilt. When looking from Central London the Green Ridge is very special.	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Cold Blow Lane	Scared and unsafe		Comment will be passed to colleagues in the Neighbourhood Community Safety Service.

Location not given	The proposed increase to dense and high rise housing in New Cross is insane. The area has been struggling for decades to get out of being an underprivileged,. under resourced and high crime area. How can it possible be sane to add more high density high rise housing that destroys the Victorian nature of the area and drags it even further down? Where the infrastructure that is already lacking? How to cope with the overstretched public transport already here? What to do about the massively polluted roads and A2, already some of the worst in London? The very LAST thing New Cross needs is more population, especially in dense and high rise properties.I totally oppose increasing the proposed housing density increase. An SE14 resident of 50 years standing.	Housing, High quality design, Sustainable design, Transport and connectivity	The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough. The Local Plan also aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Dangerous junction for pedestrians and cyclists	Cars speed up and down pepys rd. cars frequently go wrong way up Sherwin road. Cyclists go wrong way down Sherwin and musgrove rds to avoid A2	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.

Potential redevelopment sainsburys site	Overly dense housing with no consideration of impact on Hatcham conservation area. Does not take account of cumulative impact of other dense developments that are planned (Kender triangle) but not yet built. Will only make traffic worse in an already congested area. Risks viability of bakerloo line extension	Heritage, Housing, Transport and connectivity, High quality design	The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough. The Local Plan also aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Waste site	The whole area is a dusty polluted mess amongst residential housing. How was this ever allowed to happen	Sustainable design, Housing	The Local Plan aims to realise the long term reductions of energy use and carbon emissions in helping London become a zero carbon city by increasing the use of sustainable transport modes
Drakefell road traffic	Terrible traffic congestion. Parking on pavements make them impassible	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards.
Dangerous junction	Dangerous and difficult for cyclists to turn right from good wood rd onto new cross road	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.

Bromley Road Retail Park	Any plans for a residential provision here, (along with other mixed uses), could be acceptable and potentially improve the location, but due consideration would have to be given to the current level of light pollution from existing businesses in the vicinity, (such as Access Self Storage and Selco), which would adversely affect any amenity all night long. Also, road access at junction Bromley High Street/Crantock Road is already a concern, and might be compounded further. Great opportunity, thereafter, for a 'village like' development with a consideration for additional 'greening'.	Transport and connectivity, Housing, High quality design, Sustainable design	The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough.
Area of wild green space (former allotments) behind Niederwald Rd, Adamsrill Rd, Fairwyn Rd & De Frene Rd	Lovely oasis of wild green space that contains protected species. Lots of birds and other wildlife.	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Lee Green District Centre	it feels like its only designed for vehicle drivers. Pedestrians feel sqeezed onto the narrow pavements near the busy polluted roads and like an after thought The centre doesnt feel planned in a holistic way	Transport and connectivity, High quality design	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling. The Local Plan supports the redevelopment of the Lee Green District centre.

Leegate centre	Run down space	High quality design, Sustainable design	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Buckthorn Nature Reserve		Green Infrastructure	N/A The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space.
Lee Green	While there is a need for new housing - and especially social housing - which should be at least 50% of any new development - the number of units proposed seems excessive to the area. What are the infra-structure proposals for community development e.g. education, health, community activities,etc. The changes to traffic movements with the LTN has increased the volume on the main roads and a huge residential increase will bring more traffic and delays into the area.	High quality design, Sustainable design, Housing, Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough

Drakefell and Gellatly Roads	Drakefell and Gellatly Roads have been overlooked by the Local Plan and yet the problems highlighted for years still remain. Local developments are likely to lead to more traffic on this very busy B road and yet there has been no consideration to making Drakefell and Gellatly Roads "healthy" streets too, to mitigate these effects. Pavement parking makes it very difficult for prams and wheelchair users, especially on bin day. HGVs regularly use the road as a rat run and are forced to double back at the width restriction. Avignon Bridge is not supposed to carry the weight load it currently carries and there is a real danger of structural collapse.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling The Local Plan conforms to the London Plan car parking standards.
leegate	I understand that 630 new homes are planned for leegate and that Sainsbury and the BMG garage may have the same number of homes. I understand the need for new housing but there is no mention in the Local Plan of what schools, GP surgeries and improvements in public transport will be put in place to support this housing. I live 1 street away from Brindishe Lee, close to Leegate, and my children were offered a place in a school in Grove Park	Housing, High quality design, Sustainable design	The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions Opportunities will be given to comment on specific developments once a planning application has been submitted

	The Local Plan does not give maximum heights for buildings I am concerned that this will lead to much taller buildings in the area	High quality design	The Local Plan conforms to London Plan policy regarding building heights in the borough.
manor park	river could be more visible with accessible banks in main part of the park river could either have a secondary flow or a second pond to take in excess river flow existing pond could be linked to river	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.
public refuse and recycling bins	the recycling information is contradictory. The coloured banner shows pictures of items that can be recycled. However a portion of the household items image is repeated in the smaller black and white banner which shows items that should not be recycled.		The Local Plan does not have the scope to determine how information on recycling in the borough is communicated.
Edith Nesbit Gardens	This little area has some mature trees and landscaped areas with paths for walking and a play area for young children. The benched encourage people to sit and talk and it's a restful place. It is well used by dog owners .	Green Infrastructure, Community Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

pavement outside of police station/river conduit	- the River Quaggy is completely hidden under the temporary, very wide pavement in front of the Lewisham Police Station - the River Quaggy is housed in a very narrow, ugly concrete conduit in front of St Steven's Church	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.
The BMW Garage Site Allocation	Because public access to the River Quaggy is proposed to be opened up with any development on this site This would be a fanastic form of public realm in Lee Green	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.

	We wish to register our strong objection to the plans by Galliard to build 630 new homes in Leegate.The infrastructure does not exist to support the thousands of extra people that will be living in these homes.The services currently available in the area will be overwhelmed. Has any major funding been allocated to this project? It sounds as though Galliard just want to pack as many people into an area regardless of the cost to those people or the people already residing in that area. The traffic on Burnt Ash Road, especially since the Low Traffic Neighbourhood scheme was implemented, has been horrendous, slightly eased since the tweaking, but still of a very high volume. The Leegate proposal will just add more people trying to access an already polluted, high volume traffic area. The plans do not fit in with the aesthetic of the area. There will be a huge monolith rising up at one end of Burnt Ash Road out of keeping with nearby buildings. This consultation is rushed and it is quite disgraceful that people in the local area have not been kept informed and given enough time to consider these proposals.	Housing, High quality design, Sustainable design, Transport and connectivity	Opportunity to object to specific planning applications will be given to residents and the wider community during the application process. However; The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions. The consultation on the Regulation 18 Local Plan was undertaken by meeting all required statutory considerations. There were however statutory regulations in place due to the Covid-19 pandemic that restricted the activities and promotion on the consultation.

Fordham Park bins	There aren't enough bins in the park and many don't have lids so litter builds up or blows away. This is terrible for the environment, looks untidy and encourages others to also leave their rubbish lying around.	Community Infrastructure	This comment will be passed to colleagues in Parks, Sport and Leisure. Bin maintaince is not within the scope of the Local Plan.
Lee Green			No comment submitted

Ennersdale Road	Ennersdale Road has been severely neglected and this narrow residential street (built in the 1890s) has been sacrificed to traffic as a dangerous rat-run. Lewisham's own figures counted 60,000 vehicles a week pre-lockdown. The designated parking spaces on both sides of the street include 50% of the pavement – cars park with two wheels on the pavement. This makes social distancing impossible for even two people passing in the street unless one person walks on the road. The footpath is usually completely impassable on bin days (Thurs morning), when the only way to walk down the street is to physically push aside bins or to walk on the road. As curbs are covered by parked cars, there is no room for planting trees and the tight space left on the footpath is regularly neglected by street cleaners (the build-up of litter is horrendous). Ennersdale is around the corner from two local primary schools (on Beacon Road and Leahurst Road).There is no pedestrian crossing, so parents and children are forced to dash across the road between cars and vans (something I've continually observed from my front window). Ennersdale Road is also home to a large St Mungo's Spring Gardens Hostel, which specializes in	Transport and connectivity, Sustainable design	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Planning

	housing homeless people with ‘mental health issues and/or alcohol and drug dependencies’. Again, these are residents who are extremely vulnerable, almost exclusively pedestrian, and often disabled. Unlike local drivers, they are unlikely to have much leverage in terms of lobbying for local issues with councillors or on social media. Even in non-pandemic conditions, the road is not welcoming to pedestrians or accessible to those with physical disabilities. This is particularly urgent as the road is one of the few accessible pedestrian routes between East and West (or Lewisham Central and Lee Green).		

Drakefell Road	Speeding cars, heavy traffic, no safe crossing to access the park and last but not least very dirty, it has been months since somebody cleaned the street.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
New Housing Proposal	Although I totally appreciate the need for new housing, this proposal is ugly does not take into account several serious issues.	Housing, High quality design	The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough
BMW/|Quaggy River	The river area is not open for active commuting.	Transport and connectivity, Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.
Pedestrian Crossing	It is very dangerous crossing. Cars constantly cross the junction when it is busy. The box junction is not adhered to	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

	Re: Closing roads around local schools at school opening and closing times. While it is good that children should be protected around school opening and closing times, it is also the case that since the LTN was implemented the traffic on main roads has been horrendous only slightly eased by the tweaking of the LTN. For the school scheme if implemented, during the hours of 8.30am to 9.30am and 2.45pm to 4pm the cameras at Manor Lane, Ennersdale Road and Dermody Road will NOT allow traffic in ANY direction. This will reverse the tweaking of the LTN which was much needed after people on main roads were practically poisoned with traffic fumes. So, once again, traffic on Burnt Ash Road, Hither Green Lane and surrounding main roads will be crawling or at a standstill making pollution much greater than it ever was before the LTN was implemented. Fine for those living in the side roads, but dangerously unhealthy for residents living on main roads. The attitude of some living in the side road can be summed up by one of these residents commenting how quiet and 'nice' it is now in the side roads, but she was annoyed that when joining the main road on Burnt Ash Road to drive her son to Thomas Tallis, the journey took her much longer. The irony and hypocrisy	Transport and connectivity	This comment will be passed to colleagues in Highways. Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

	escaped her. Surely, you should be fining parents who insist on taking their children to school by car? This scheme will mean that they will still bring their children, but will be leaving their cars parked just outside the exclusion zone, creating more mayhem. The LTN is elitist and does not benefit all Lewisham residents.		

Legate Centre Development	Far too dense No indication of any local infrastructure support for yet more residents Will end up looking like Lewisham Town centre development, pretty grim and dystopian.	Housing, High quality design, Sustainable design	The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Pavement slabs replaced with ugly tarmac	Slab pavements are part of character of the area. It seems when we get to end of tax year there is a sudden rush to slap tarmac down replacing the slabs also covering the tree roots	Sustainable design	This comment will be passed to Highways and Strategic Transport. This concern is not within the scope of the Local Plan.
Perry Vale Care Park	An under-utilised facility.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Unused Commercial Space	There is an unused commercial space here on the corner of Childers Street and Rolt street - I appreciate the companies here are trying to let these spaces. However this and many others in the area have been left empty for the past 3 years and are being vandalised.	Economy and culture	Comment will be passed to colleagues in the Neighbourhood Community Safety Service.
Woodpecker Road Bins - No Tops	In the local parks all of the bins have tops on them to stop litter blowing out of them. All of the bins in the woodpecker road estate do not have this. The area around Hawke tower is a real wind tunnel, this	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement and Parks, Sport and Leisure. This issue is not within the scope of the Local Plan

	causes the litter to be blown all over the place.		
Maintain the grassy areas in the estate	There are lots of grassy areas on the estate which have been neglected.	Green Infrastructure	This comment will be passed to colleagues in Parks, Sport and Leisure.
Community Notice Board	I love the idea behind the communal notice board and the way this was used to ask for ideas for the area.	Community Infrastructure	Noted This issue is not within the scope of the Local Plan.
Manor Park	This is SUCH a wonderful park. It's a beautiful spot in the local area. Please keep working hard at maintaining it. Sometimes the fountain is switched off which is a great shame because it's a very good way to help ease the stresses of the day. The team behind the cafe pistachios in the park are brilliant too.	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Leegate	It feels as though this develop has been talked about for over a decade? Is that correct? Please can it be speeded up. Strikes me there is a potential here, as per the plans, to have a mixture of social housing and affordable private housing that is so very needed. The buildings are also an eyesore and local businesses would benefit from the whole area looking better and	Housing, Community Infrastructure	The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough. Opportunities will be given to comment on specific developments once a planning application has been submitted

	prosperous. A place that people can feel proud of and an important community hub		
The area outside the tennis courts	Please put in some bike racks. So many people cycle to these courts and there is nowhere to secure them and we're not allowed to take them on court.	Transport and connectivity	Comment will be passed to colleagues in Highways and Strategic Transport. The Council has a policy of increasing the availability of on street cycle storage in the Borough however the delivery of cycle storage is subject to available funding.
Current Galliard Homes proposals for Leegate	Up to 15 storeys is too tall Up to 630 new homes is too much density on this site	Housing, High quality design	Opportunities will be given to comment on specific developments once a planning application has been submitted.
Heavy levels of through traffic	Even in COVID lockdown with generally reduced levels of traffic, Geoffrey Road is still significantly congested on a daily basis by through traffic, with frequent gridlock, noisy arguments as motorists jostle past each other on a road that is too small and resulting air pollution.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Leegate development - Galliard proposal	Firstly I have had no direct communication on the Galliard development! For the previous reiteration I was sent information. Noted proposal on the Local Plans fails to truly address the needs of Lee Green. Firstly if the designation of “District” is to have merit, Lewisham has fallen far short of any thought or investment in this area for decades. I grew up in the area and sadly saw the decline of the shopping hub. The proposals in the Plan does not account for the locality of people’s wellbeing, health and needs. It is ill-considered and is treats Lee Green as a poor cousin to other districts. There is a particular issue for Lee Green due to it’s condensed nature, location on key traffic routes. These have not been considered appropriately in sensitivity analysis, nor mitigation’s to improve. The needs and impact to the existing community as well as the new community has not been factored in currently to make the Local Plans sustainable. Dwarfing the corner with inappropriate massing, ie very tall structures, will further deteriorate this area of Lee Green.	Economy and culture, High quality design, Sustainable design	Opportunities will be given to comment on specific developments once a planning application has been submitted. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions

Honor Oak Park	Traffic is prioritised and people on foot and cycle have to work around this. It shoul be the other way round!		Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling.
Bridge parapet on southern bridge over railway	The parapets on either side of this bridge are an early work by reknowned concrete artist William Mitchell and commissioned by the GLC when he used to have a workshop in Forest Hill. Not cared for even though the council has a duty of care over public art in the borough (and have been notified about this) and it should be celebrated. The brief was to erect an interesting structure which deterred graffiti - it has achieved this!		Comment will be passed to colleagues in Planning and Highways and Strategic Transport.
Back Garden space	Garden space forms important wildlife corridors which are just as important as railway embankments. They are also crucial amenity space	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.

Honor Oak Rec	Engage with Southwark council on what is primarily recreation space for Lewisham residents (the Rec and One Tree Hill itself, i.e. not just the nature reserve).	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Enforce action against unpermitted development	It is all very well having policy but of little use unless it is enforced especially when there are flagrant breaches	High quality design, Sustainable design	If there is suspicion of an unauthorised development please contact the Planning Enforcement team.
School street improvements	Make safer for pedestrians with school children	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Cycle Crossing	There are cycle route either side of the A2 (New Cross Road) but there is no save way to cross it at that point. There is a pedestrian crossing further a long but it has an island in-between which is too small for pedestrians and cycles.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Lee Centre	I feel really optimistic about the redevelopment of this run down shopping centre. However I hope that the things that are good about it are retained. Space for community centred business, I love yoga house, Cade, the swop shop. There's very little in hithergreen and lee in terms of community gathering spaces apart from MHG so public space, playgrounds and community/ business spaces are really important. The important thing is to keep these spaces affordable in perpetuity. I don't mind about the height but additional school and GP provision is important.	High quality design, Sustainable design, Housing, Economy and culture, Community Infrastructure	Opportunities will be given to comment on specific developments once a planning application has been submitted The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Former allotments off Adamsrill Road	It was never planned, but the site has become - over the years - an valuable natural habitat, part of the 'green infrastructure' of the area: Mayow Park (a Site of Importance for Nature Conservation), Dacre's Wood, Sydenham Garden, the river walk, etc, etc. It supports a wide range of species, as noted in the other comments by local residents. As the density of this area increases (a number of large construction sites are currently active) these pockets of biodiversity become more and more important. Quite apart from the enjoyment they bring, they also have	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.

	functional benefits, removing heat and air pollution.		
More planting to support climate emergency	It is great we have trees here but would be even better to underplant trees with shrubs to counter pollution and give houses on lanchester way more screening from queens road	Green Infrastructure	Comment will be passed to colleagues in Parks, Sport and Leisure. This issue is not within the scope of the Local Plan
Neglected space.	Tarmac is old bumpy and ugly. Also does not absorb rain water. Trees have tarmac all the way up to roots of trees	Green Infrastructure, Sustainable design	Comment will be passed to colleagues in Highways and Parks, Sport and Leisure. This issue is not within the scope of the Local Plan
Road floods in heavy rain. Ugly wide pavement on both sides of new cross road	Lots of hard surface which is angled so that water goes into the road and floods. In winter frequently v large puddles with road surface that gets damaged by buses creating a hazard for cyclists	Sustainable design	The Local Plan aims to guard against the risk of flooding by ensuring, however the Council is not responsible for flooding on public roads. Issues such as this should be raised with Thames Water.

Wide ugly pavement lots of hard surface	Very concrete pavement area	Sustainable design	Comment will be passed to colleagues in Highways Maintenance
Wide ugly pavement which contributes to flooding in heavy rain	Missed opportunity with climate emergency	Sustainable design	The Local Plan aims to realise the long term reductions of energy use and carbon emissions in helping London become a zero carbon city by increasing the use of sustainable transport modes.
Bell Green	This whole area (Sainsbury's, the retail park, the gas holder site, Orchard and Pear Tree Courts, and the industrial site bounding Stanton Way) makes me sad and frustrated every time I come here. It has been a long series of terrible missed opportunities. Planning permission should never have been granted - it fails so predictably and on so many levels. There is no sense of place or identity, no character, no coherent frontage or animation to the surrounding streets, no purposeful sense of front and back, poor connection to existing pedestrian routes, badly considered pedestrian crossing strategy, minimal soft landscape, substandard maintenance, basic design and shoddy construction. A site of this size was a gift and it has been squandered.	High quality design, Sustainable design, Transport and connectivity, Green Infrastructure	The Local Plan includes proposals for the redevelopment of the Retail Park, which will include the reconfiguration of street layout and public realm.
Contra flow for cyclists	This is a quiet road which is great for cyclists but only one way	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Rat run road	Having troutbeck 2 way creates rat runs across telegraph hill with cars able to turn right onto new cross road	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Wide ugly pavement		Transport and connectivity	No comment submitted
Damaged pavements	Caused by cars mounting pavement for gellatly stores as road is narrow. Pavements also get narrow / impassable when cars are on pavement	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards. Comment will be passed to colleagues in Highways and Strategic Transport.
Trees planted around flats	Great to see more trees planted rather than only neglected lawn	Green Infrastructure	Comment will be passed to colleagues in Parks, Sport and Leisure. Contact should also be made to the management company who maintain the building and grounds
Trees planted	Great to see trees planted	Green Infrastructure	Noted The Local Plan advocates the principle of a Greener Borough
Dangerous crossing	Very difficult to cross road on foot or bike given heavy traffic and unsympathetic drivers	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Cycle path not clear / dangerous as Halfords/ wickes wntrance	Poorly laid out and not clear to motorists that this is a cycle path	Transport and connectivity	This comment will be passed to Highways and Strategic Transport
Lack of planting	It is a wonderful space but feels neglected due to lack of imaginative planting.	Green Infrastructure	Comment will be passed to Parks, Sport and Leisure The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Neglected space	Surface is bumpy and neglected making it uncomfortable to cycle on. Patches of grass look unkept/ uncared for	Transport and connectivity	Comment will be passed to Parks, Sport and Leisure and also Highways

Gaillard redevelopment of Lee Green	I've been informed Gaillard wish to build a heavy density set of high rise apartment buildings in the redevelopment of Lee green. I'm very pro the redevelopment and think it could be a real asset to the community but there are serious issues with what is being pushed through with little consultation.	High quality design, Housing	Opportunities will be given to comment on specific developments once a planning application has been submitted The Local Plan supports the redevelopment of the Lee Green District Centre.
Flower beds	Great that we have them- more please and encourage local businesses to maintain them	Green Infrastructure	Noted
Proposal for 900+ units is too high density	This together with the Kender triangle and goodwood site is too much cumulative development in new cross. Mega high rise is inconsistent with neighbouring conversation areas. Current amenities- schools, nurseries, parks, drs surgeries and transport already over Subscribed over capacity. Inconsistent with plan objectives of more family housing	High quality design, Sustainable design, Housing, Heritage	The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions

Magnificent pine tree	There is a wonderful pine tree next to the railway line on the goodwood site	Green Infrastructure	Noted
Magnificent black mulberry tree	Please protect and plant more!	Green Infrastructure	Noted
Planting along river ravensbourne	Haven for wildlife. Helps alleviate flooding in lewisham	Green Infrastructure	Noted
Wonderful planting	Planting in alley way is wonderful. It is a joy to walk down here	Green Infrastructure	Noted
Neglected space.	Fly tipped and lots of litter	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement The prevention of flytipping is not within the scope of the Local Plan
Opportunity for more bio diversity	Lack of planting / grass area	Green Infrastructure	Comment to be passed to colleagues in Parks, Sport and Leisure
Wide ugly pavemenr	Lots of tarmac	Sustainable design	Comment to be passed to Highways

Stanstead Road parade	The parade has been left to decay - no local amenities for locals to use, no greenery and care-worn public realm. Also an urgent need to tackle the toxic congestion going into Catford.	Sustainable design, Economy and culture, Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions
Don't run the Green Link this way	Running the Link from Crofton Park Station to Ladywell through the cemetery is not the best route, as it would be less attractive to women during darker hours.	Green Infrastructure, Transport and connectivity	Noted
Don't run the Green Link this way	Running the Link up steep roads, while a direct line, will make this less attractive for people of all abilities.	Sustainable design, Transport and connectivity	Noted
Ravensbourne Road/Sunnyside	Serious safety concerns about crashes and near-misses due to rat-running around blind corners. Insufficient traffic-calming measures, no space to pass and no safe crossing points for the legions of people making their way from the South Circular to Blythe Hill Fields	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Galiiards Home proposal	Proposed height of buildings too high Proposed amount of flats too many No consideration for the aesthetic feel of the local area i.e older buildings. More traffic, greater strain on local infrastructure and facilities. A money making idea without any consideration for those who already live in the area.	High quality design, Housing, High quality design, Heritage, Transport and connectivity	Opportunities will be given to comment on specific developments once a planning application has been submitted
St Dunstan's Triangle	The layout of this section of the South Circular causes one of the worst bottlenecks on the A205. Idling cars stuck in traffic causing an air-quality hot spot.	Transport and connectivity	The Local Plan aims to realise the long term reductions of energy use and carbon emissions in helping London become a zero carbon city by increasing the use of sustainable transport modes.

Eastern Avenue, Hilly Fields	The stretch of undergrowth on the western side of the top of Eastern Avenue was one of the only remaining pieces of wild habitat left on Hilly Fields. The brambles, nettles, cow parsley, alkanet and other native plants that grew there were like a fingerprint of what would have been there for hundreds of years when this area was farmland bordered by hedges. In fact this stretch may be what's left of a former hedge judging by the trees that line the road here such as hawthorn. These plants provided food and shelter for a wide range of invertebrates as well as birds and small mammals. Below the undergrowth were rotting logs and generations of leaf litter. All this has now been cleared and replaced largely by bare soil devoid of its covering of decaying vegetable matter. I am told that native species have been planted. There is also a pile of logs. I do not see the point in destroying established habitat and replacing it with somebody's version of what they think the habitat should be. The reason the brambles and other plants were growing so vigorously was that they were perfectly suited to that particular corner of Hilly Fields. Wildlife is under extreme pressure worldwide. Not just biodiversity but the actual numbers of individual insect, other invertebrates and vertebrates as well	Green Infrastructure	The Local Plan aims to promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets – including trees, green spaces and water spaces and seek to enhance existing assets or make new provision through new development wherever opportunities arise. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

	as plants and fungi. It is acts of destruction like this which are repeated all over the borough that are helping to make it less biodiverse and less wild. The native species planted could have been planted further down Eastern Avenue where there is just mown grass. That would in the long term have actually been positive for Lewisham's wildlife.		

Ravensbourne Rd	Hazardous rat run. No place to cross safely. Poor street lighting and pavement that isn't fit for purpose.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Leegate shopping centre	Proposals are being considered by the council and the community have not been consulted		Opportunities will be given to comment on specific developments once a planning application has been submitted

Shopping parade/South Circ	Atrocious air quality. Family area that had to endure toxic air and a complete lack of investment to create a quality commercial hub for our community. In an area of young families, this parade could be a vital resource for the thousands of people that live in the surrounding streets. As it is, people have to use their cars to travel to retail parks and supermarkets to shop. The parade offers no option to shop local.	Sustainable design, Economy and culture, Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling The Local Plan aims to realise the long term reductions of energy use and carbon emissions in helping London become a zero carbon city by increasing the use of sustainable transport modes The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Stanstead Road	Gridlocked traffic. Terrific air quality issues	Transport and connectivity	The Local Plan aims to realise the long term reductions of energy use and carbon emissions in helping London become a zero carbon city by increasing the use of sustainable transport modes.
Drakefell Road	The pavements are blocked with parked vehicles.Some of these are parked here for extended periods, when the owner does not appear to live here. Residents are often forced to walk in the road and mix with traffic. Moreover footfall is increasing due to more people using Telegraph Hill upper park, and yet social distancing is not possible on narrow blocked pavements. Any meaningful local plan would prioritise walking and therefore enforce the pavement parking ban. This is not the case in Drakefell Road. This local plan is likely to make the situation worse as it does not explain how the increased population	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards.

	across the borough are going to be physicallly able to walk and use public tranpsort if pavements are inaccessbile.		
Ravensbourne Road/ sunny side junction	This is used as a rat run and frequently has large lorries getting stuck and damaging parked cars. Cars generally go too quickly down the road also.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
Kirkdale Roundabout	This area is too dominated by fast traffic.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.

Kirkdale	Unsafe for cycling as not enough space and many drivers drive too fast and dangerously. Cars are often driving way above speed limit.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
South Circular at Forest Hill	Cyclist safety	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
Central Catford	Cyclist safety	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
Sydenham Wells Park	Best park in London	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

Unsafe road crossing (Taylors Lane)	Dangerous exits from the park	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
Baxters Field	Mopeds and motorcycles use Baxter Field as a cut through, they often speed through the park where there are children playing, it is very dangerous	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
Baxters Field	Lack of concern for nature in the Glendale/Lewisham Parks contract	Green Infrastructure	Comment will be passed to colleagues in Parks, Sport and Leisure The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Rushey Green	An unwelcoming and intimidating road to cycle on.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.

Ladywell Road	It is dangerous and intimidating entering and exiting Ladywell Fields and following the Waterlink Way.	Green Infrastructure	Comment will be passed to Parks, Sport and Leisure
Brockley Road roundabout	Terrible place for cyclists - what are cyclists emerging from the lovely route via Eddystone Rd supposed to do to turn right? Drivers rarely understand the cyclists may be doing a U turn on the roundabout, and are often tempted to take over. Some more frequent users of this route are forced to go against the flow of traffic to reach a pedestrian island before rejoining the road, or to wait dangerously at the enrance to the "roundabout" until the road is clear.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
Ravensbourne Road	This is the street where I live. I love the community and many of the things we have but there are some real problems that make me worried about my family and my future here.		Noted
Ravensbourne Road	Perilous t-junction with cars meeting from three directions at speed with often obscured corners due to parked cars. Essential that something should be done to make this junction safer.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.

Stanstead Road	Grim parade. Place making is nonexistent, unwelcoming environment and of little use as an essential shopping hub for locals.	Sustainable design, Economy and culture, High quality design	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Pavement parking	The allowance of payment parking on the woodlands makes the street very unfriendly for pedestrians. Cars regularly double park on this corner and it is dangerous for all pedestrians, cyclists and drivers. The lack of CPZ also means cars and vans are regularly abandoned here.	Transport and connectivity	The Local Plan conforms to the London Plan car parking standards. CPZs outside the scope of the Local Plan
St Dunstan's traffic lights	Lewisham and TfL need to think about this area and how stripping out reasons for the permanent traffic jam that builds here will help the CO2 levels so near to so many schools and homes of young families.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Brookmill Park - bike route	It's a great north-south route by bike or on foot.	Transport and connectivity	Noted
Empty building	I hope this building's beauty is restored, right now it is covered in graffiti but we could use a new school or GP or anything really.	Heritage, Community Infrastructure	Noted

Ravensbourne	Dangerous pavements Speeding cars No place to cross with children Too dark and scary Fly-tipping	Transport and connectivity, Sustainable design, Community Infrastructure	Comment will be passed to colleagues in Highways/Parks, Sport and Leisure and Environment Crime Enforcement Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Paved area in front of Waldron Health Centre	Missed opportunity to have more greenery and a space for pollinators!	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.
The Albany Garden	What an amazing community space and spot of greenery! Always look forward to walking by.	Green Infrastructure	Noted

Between Lewisham College and the Laban Centre.	The area has huge potential, but I fear control has already been handed oveer to private developers.	High quality design, Sustainable design, Community Infrastructure	All planning applications are subject to a rigorous assessment process. It is not correct to ascertain that control of a site is handed over to private developers.
Lee green crossroads	This is an incredibly polluted, traffic-clogged junction that has no protected space for cyclists and is incredibly unpleasant for pedestrians. At points there are four lanes yet there is no safe space for bicycles. Building more lanes only encourages more driving. This area should be prioritised for segregated bike lanes, planting and wider pavements. Speeding and driving in general must be discouraged - there simply isn't the space for the number of vehicles currently on our roads and the resulting pollution is causing a public health crisis. We also need the LTNs expanding to ensure there are safe	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.

	and pleasant places for cyclists and pedestrians. Thank you		
Pedestrianise Deptford High Street	Deptford High Street is so vibrant and a key part of this community, but it's been such a shame seeing Rye Lane get pedestrianised and meanwhile Deptford high street still involves dodging cars to cross.	Transport and connectivity	Rye Lane was pedestrianised as part of Southwark Council's Covid -19 management plan to encourage increased footfall on the high street. It is no longer pedestrianised. Comment refers mostly to restrictions that were in place during the Covid-19 lockdown
Blythe Hill shops	Nothing there to shop locally Rundown Ghost town day and night Intimidating atmosphere Non-stop traffic	Transport and connectivity, Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Trash house	This derelict building wasn't given planning permission after it was built, so for a decade it has been sitting and accumulating trash in the yard, an eyesore and a waste of	Housing	Comment will be passed to colleagues in enforcement. The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough..

	space in an area that could easily use more housing.		
Central Catford - redeveloping the shopping centre	The redevelopment needs to retain space for the small-scale stalls run by local people - not just welcome in the gin-making incomers that the private developers think will make Catford attractive to the home-buyers priced out of wherever.	Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Shuttered community centre	There are a few vacant buildings that are a missed opportunity to add a positive to the community, either as their original use or as a nursery or incubator for local businesses or anything at all!	Community Infrastructure, Economy and culture	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Blythe Hill-Ladywell Fields-Catford/Catford Bridge-Catford Town Centre	Missed opportunity. For cyclists wishing to avoid the south circular, travelling from Honor Oak to Catford is currently tricky. The 'natural' route is to take the roads over/around Blythe Hill and into Ladywell Fields - but then the railway gets in the way. The promised bridge over the railway that Barratts were due to build would be ideal to enable the cyclist to safely complete the final leg of the journey. Currently, they have to go as far north as the hospital, to use the whiligig bridge in that part of Ladywell Fields; or brave the death trap of Catford Road.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.

Blythe Hill shops	Abandoned looking Bad smog and air No shops of any quality Of no use to the local community Intimidating atmosphere Ghost town day and night Non-stop traffic No shelter for bus stop Waste bins everywhere	Transport and connectivity, Sustainable design, Community Infrastructure	The Local Plan aims to address a number of the issues highlighted in this comment
Next to the railway	This beautiful area is blocked off to the public in many places. Making a walking route all the way along would not only allow us to access the incredible nature there, which is great for our physical and mental wellbeing, but will also act as a green commuting corridor. Already Lewisham has some of the most polluted roads in London. Active commuting and taking people away from the busy Baring Road is exactly the kind of initiative that Lewisham claims to support in their constant fight against the car and pollution.	Transport and connectivity, Green Infrastructure	The Local Plan aims to realise the long term reductions of energy use and carbon emissions in helping London become a zero carbon city by increasing the use of sustainable transport modes.
River Pool Linear Path	Missed opportunity. Catford Bridge is a death-trap for cyclists and the cantilevered bridge is still years away.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling. The Local Plan supports the redevelopment of Catford including improved infrastructure.

			The Local Plan also aims to provide physical infrastructure needed to support growth and sustainable places, including through the use of CIL funding and developer contributions
SOUTH CIRCULAR	Terrible traffic all day and night Bad smog in that whole area	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Bridge over the railway between Silverdale and Sydenham Park Rd.	I can't get over the bridge using my bicycle: the steps are too steep. My legs are strong, my upper-body less so! More importantly, the bridge is also inaccessible to wheelchair users and difficult for parents/carers pushing a buggy.	Transport and connectivity, Sustainable design	The Local Plan aims to create Healthy and Safe communities by addressing the detriments of physical and mental health. The Local Plan also aims to provide physical infrastructure needed to support growth and sustainable places, including through the use of CIL funding and developer contributions
Unused / neglected commercial space	Units here have been left empty since these buildings were erected (at least 5 years) and have seen rats move in and vandalism encouraged.	Economy and culture, Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement and the Safer Neighbourhoods Team The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Crofton Park Railway Garden	This open space has become very important to local people since it opened in June 2019, and especially over the past year.	Green Infrastructure	Noted

			The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
	Wickes, Halfords, etc - useful shops, but v unlovely. As someone who lives reasonably close by (Hurstbourne Rd) I would be completely happy if you put high-ish-rise flats here by the station - so that young childless workers can fall out of bed in the morning and onto a train to go to work; and come home to spend their hard-earned cash in Catford's new amenities at night/ at the weekend. Hang onto all the good quality social housing possible in Perry Vale, Bellingham and Downham, for families who need the space.	High quality design, Sustainable design, Community Infrastructure, Housing	The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough.
Terrible litter and fly tipping	There is a lot of litter in this area and fly tipping. It makes the area ugly, is bad for the environment and wildlife and generally makes the locals feel they are living in a dirty area. The messier it is, the less locals will care or make the effort to keep it tidy.	Community Infrastructure	Comment will be passed to colleagues in Environment Crime Enforcement The prevention of flytipping is not within the scope of the Local Plan
Horniman gardens	This place is a gem	Economy and culture	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

Pedestrian walkway	This pedestrian walkway is very dangerous. It is under a railway bridge, is a tight bend for cars and has a narrow pavement. It feels unsafe to walk under and cars go round the bend / past you, very fast and at close range. Real tragedy waiting to happen.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Dangerous crossing area	This busy road is hard to cross and there are no traffic lights or helpful ways to get pedestrians across the road. There is a lollipop person at school times but is an issue more times of the day/week.	Transport and connectivity	Comment will be passed to colleagues in Highways and Strategic Transport. Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Junction where Honor Oak Road meets Forest Hill Rd and Honor Oak Park	It is difficult to turn out of Honor Oak Road. Viewing can be hard and traffic sometimes speeds. There are also dangers for pedestrians.	Transport and connectivity	Comment will be passed to colleagues in Highways and Strategic Transport Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Local wildlife / bird feeding	Many feed the birds bread which is not only really bad for them but encourages rodents, which are a threat to the dwindling nesting bird population.		Noted This issue is not within the scope of the Local Plan

park cafe honle	This cafe is a huge asset to the area. Serving wonderful food and drink and providing a much needed stopping place for many in the community. The area doesn't have many eateries or cafes so honle is really important for the neighbourhood and Martin and his team make such a difference.	Economy and culture, Community Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Pedestrian / cycle bridge across from Beadnell Rd to Devonshire Road	It is a great idea, but it would be very damaging to the two nature reserves (Devonshire Road and Garthorne Road). This would not fit with Lewisham biodiverslty plans.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces

Lee gate	I feel this redevelopment has dragged on far too long, the council has failed to listen to the views of local residents, and now is considering proposals of 15 storeys and 650 units which is more appropriate at Kidbroke or Lewisham roundabout than in a residential area that accommodates families with conservation and listed buildings served by an infrastructure that is already at breaking point, pre-COVID. It is extremely upsetting to face the prospect of Lee Green looking like Lewisham roundabout. I cannot believe that Lewisham Council has not set out strict criteria already to stop wasting more time on this project, when so much should have been learnt from the St Modwen applications.	High quality design, Heritage, Housing, Sustainable design	Opportunities will be given to comment on specific developments once a planning application has been submitted. The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough. The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions

Traffic calming measures are needed in Grierson Road.	Too many vehicles, mostly cars and motorbikes, travel too fast along Grierson road, where there are many small children and also older people.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
Disused pub	This building has been boarded up and unused for many years. It could be something really great for the community either as a restaurant / pub / cafe. We don't really know why it has never been open to business investment.	Economy and culture, Community Infrastructure	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities
Land at the back of Northbrook Park	This land is beautiful, with incredible biodiversity and value. we need this to be green space and not built on. This area is part of a green corridor between the south circular and Elmstead woods that desperately needs protecting - it is an important carbon sink as well as full of vitally needed wildlife.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

Bradgate Road	The two way traffic flow on the narrow Bradgate road creates daily tension and danger for pedestrians and residents. Two cars cannot safely pass, and so cars often have to hold back, meaning the other car speeds along, and/or there is regular aggressive confrontations and arguments and refusal of either party to back up. I have suffered physical and verbal abuse from having tried to intervene to resolve stand offs, when motorists are beeping horns at bedtime for children. Also, Bradgate road is used as a rat run to avoid the A21/south circular route which will become even more acute if the proposed town centre regen and south circular re-route goes ahead. It needs resolving, in advance.	Transport and connectivity	Comment to be passed to colleagues in Highways and Strategic Transport Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Garthorne Road Nature Reserve	Garthorne Road Nature Reserve is a delightful quiet space in the borough.	Green Infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.

Ringway gardens and horse meadow	Beautiful, vital spaces. This is part of our amazing wildlife corridor between the south circular and Elmstead Woods, yet it is perennially under attack from development. The council are not doing what they should do to protect it - SINC and MOL reviews are inaccurate.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Aldi redevelopment	I am concerned that the redevelopment could be highly damaging to the light and privacy of residents on Bradgate road contrary to proposed policy QD11. The previous development on the car park (17 Scrooby St) caused significant overshadowing and loss of privacy and shouldn't really have been allowed in its current form.	High quality design, Housing, Sustainable design	Opportunities will be given to comment on specific developments once a planning application has been submitted.

Burnt Ash Hill	Burnt Ash Hill has a huge volume of traffic at nearly all times of the day and night. Huge skip lorries, and other large vehicles drive along it at speed, swerving to avoid the speed bumps and traffic islands. On numerous occasions I have seen people overtaking other drivers at >40 mph. It is so dangerous. The traffic along this road must be reduced - we are just suffering from people cutting through our neighbourhood in their hurry to get somewhere else. There is also ZERO cycling infrastructure - in order to cycle down Burnt Ash Hill you have to cycle on the wrong side of the road or the pavement in the mornings in order to get past the huge queue of traffic waiting for the lights. There are cars parked all along both sides of the road, which means there is no room for cyclists.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
Burnt Ash Pond	Really sad every time I see how run down the pond is - thick weed all over it. Also it's inaccessible! Why can't we enjoy this space or enable children to learn here?	Community Infrastructure, Green Infrastructure	Comment to be passed to colleagues in Parks, Sport and Leisure. The Local Plan aims to promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets – including trees, green spaces and water spaces and seek to enhance existing assets or make new provision through new development wherever opportunities arise.
Coopers Lane School	School street is brilliant! Thank you!		Noted

Grove Park Nature reserve and green corridor	The plan refers to green infrastructure, but only seems to have the formal parks. If it's just the parks, then it needs relabelling, otherwise it should include ALL green infrastructure, including MOL, SINCs, nature reserves, green corridors, etc. Some green space maps miss a significant part of the MOL land in Grove Park	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces
Eckington gardens and Monson road	Eckington gardens is not a generally pleasant park to want to spend time in. It is quite dark and can feel intimidating to walk through at times.	Green Infrastructure	Comment will be passed to colleagues in the Neighbourhood Community Safety Service and Parks, Sport and Leisure. The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces
Bridgehouse meadows.	The space is currently used poorly and no attempt has been made to make it more interesting with landscaping.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces. The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Cycle lane contra flow please	Dangerous road. Frequently has drivers using it the wrong way. Only way to avoid busy new cross road	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

Brockley Rat-run	Rat-running should be prevented	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Dangerous crossing	The crossing to Hilly Fields park is not safe	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Brockley Cross	Very dangerous traffic intersection / double roundabout. Poor visibility and road markings on pedestrian crossing near railway bridge.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Green space	Just improves the whole area by having green space for larger trees.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces
Parks and night skies	Too many lights in park. Lights are more frequent than on roads, badly positioned.		It is not in the scope of the Local Plan to determine where lights are positioned within parks.

Slagrove place	Nothing done to design attractive green space.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces
Street scape	Dead trees no scale with new planting - which might even be dead.	Green Infrastructure	Comment will be passed to colleagues in Parks, Sport and Leisure.
Station approach	Not very 'approachable' could be a little urban square with trees, but instead just a road making it seem cars have priority.	High quality design, Transport and connectivity, Green Infrastructure	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Ladywell Fields	Lacking on biodiversity and design..	Green Infrastructure	The Local Plan aims to promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets – including trees, green spaces and water spaces and seek to enhance existing assets or make new provision through new development wherever opportunities arise.
Sherwin road - cycle lane contra flow		Transport and connectivity	No comment submitted
Roundabout	This is a dangerous and very busy roundabout. Cars flip here, and accidents are common. There is no option for	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling

	pedestrians to cross anywhere in close proximity.		Comment will be passed to colleagues in Highways and Strategic Transport.
Pond regeneration in Folkstone Gardens	I welcome regeneration of this lovely space, it was carried out in really unpleasant way though - and looks like works were never completed? There are still remains of the fence on the side of the pond that were never removed. Park fencing that was broken during grass cutting got nicked and now some dog owners bathe their dogs in this wildlife resource.	Sustainable design, Green infrastructure	Comment will be passed to colleagues in Parks, Sport and Leisure The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Mercury way recycling centre	The amount of mess and damage (to pavements, trees) from vehicles coming out of the recycling centre here is very disappointing. On a rainy day you this road is a mess to cycle though because of the dirt on the road. On a dry day this place is converted with heavy dust. It's so unpleasant to walk though here.	Transport and connectivity	Comment will be passed to colleagues in Highways and Strategic Transport. It is not within the scope of the Local Plan to resolve this issue.
Mercury way pavements	Most pavements alongside this road are not wheelchair accessible.	Transport and connectivity	Comment will be passed to colleagues in Highways and Strategic Transport

Mercury way - cycle way	The cycle way coming from the arch on Surrey Canal road onto Mercury way needs to be looked at. The Mercury way cycle way sugaring is impossible to ride on, and the cycle way doesn't re-join the road in any reasonable way. Fixing it will allow more people avoid blind turn onto Surrey Canal road.	Transport and connectivity	Comment will be passed to colleagues in Highways and Strategic Transport Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling
Playground	There are big patches of almost bare earth in the planting areas. Are they being treated with pesticide? Why aren't there plants here.	Green infrastructure	This comment will be passed to colleagues in Parks, Sport and Leisure.
Bridgehouse meadows	Many people use this space for picnics gathering and dog walking. It's nice and the view is lovely! It's one of the rare open areas to fly a kite or play without disturbing a picnic.	community infrastructure, green infrastructure	Noted The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy
Estate redevelopment	Re-development of old buildings into new ones is positive in many ways. There is a deep need for new quality contemporary business premises development. Of course there is a worry about the business currently here- where do they go, can we afford to loose more workplaces locally?	Economy and culture, sustainable design, High quality design, Heritage	It is an aim of the Local Plan to protect and enhance the Borough's employment spaces

Eastern Rd/Access Lane cutting (Hilly Fields Park)	A lot of hard work is gradually giving results in terms of increasing biodiversity and planting of trees - part of local, regional and national policies relating to global warming and pollution control.	Green Infrastructure	The Local Plan aims to support London in achieving its National Park City status by protecting, enhancing and connecting the Borough's network of parks, open and water spaces including the delivery of a Green Grid to improve linkages to and between these spaces.

Garthorne Road	Motorists block the gate, denying cyclists access.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling This issue is not within the scope of the Local Plan
Bromley Road	No safe crossing, and no public trees for entire length, between Laurence House and Retail Park, (Crantock Road).	Transport and connectivity, Green infrastructure	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling. It is not within the scope of the Local Plan to determine where trees are plated however it does advocate the principle of a greener borough.
	B238 traffic often blocks the through route north or southbound on Grierson Road, stopping safe cycling.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
	It's super dangerous to join as a cyclist here, and there is no provision to join Eastbound traffic for cyclists.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.

	Lack of provision for cyckists accessing Q1 via Monson Road.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
Brockley Rise	No provision for cyclists to safely enter Brockley Rise for local shops etc from the Chandos Roundabout.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
Brockley Rise	Vehicle idling is a major problem	N/A	This issue is not within the scope of the Local Plan. Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
Waller Road	Too much traffic on this road at school drop off and pick up	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.

Dennett's Road	There have been at least two serious collisions involving reckless drivers in their cars on this road, immediately next to the school.	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
The Sydenham Centre	The Sydenham Centre is a real community asset. Larger spaces for events, meetings, conferences, performances etc are rare in the local area. It is an asset in terms of the space available for use.	community infrastructure	Noted
Ravensbourne Road	- Lorries and irresponsible drivers use the road as a cut through, it's dangerous for children - the road has a rundown shabby feel after years of neglect, most of the pavement needs redoing - quite a few properties are used as emergency council accommod	Transport and connectivity, high quality design	Although the Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling. Emergency Council accommodation is an essential Council service.
Lewisham's Local Plan	Important to be involved in the proposals affecting the local area	N/A	Noted

Sainsbury's Site	Concerned by the potential designation of over 900 dwellings. The infrastructure and available green space - even after the BLE - does not support this number.	Transport and connectivity, Green infrastructure, community infrastructure	The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions The Local Plan supports the redevelopment of Bell Green
This junction needs a pedestrian crossing!	It's not always easy to cross Honor Oak Road safely on foot - as the route up to the Horniman Museum surely this should be made safe for pedestrians?	Transport and connectivity	Local plan advocates Healthy Streets Approach. This is based on re-balancing the road network to reduce car dominance give priority to movement by walking and cycling Comment will be passed to colleagues in Highways and Strategic Transport.
Need to Revitalize Randlesdown in Bellingham	Lloyds closed the only pharmacy in this area and now will not allow another pharmacy to open. This location was always busy and served a large customer base, many of whom were older patrons who cannot walk all the way to the Lloyds in Lower Sydenham. It's very discouraging to see our useful shops be taken away, while we have plenty of shops offering fried foods and candy.	Community infrastructure	The Local Plan advocates for a thriving local economy which ensures that all identified Town and Local centres remain the focus for community activity and support growth including retail, business and cultural activities

New build is a terrible idea	This is a terrible idea. We all rely on the coop and don't need a good car park and pub going the way of the dinosaurs. The last thing we need in this area is more condensed low income housing, we're trying to make grove park and downham a better place. Do this development in a wealthier area of Lewisham and focus on improving the lighting, footpaths and green spaces in downham and grove park.	High quality design, Transport and connectivity, community infrastructure, Economy and culture	The Local Plan aims to proactively respond to population growth and help meet London's housing need by positively managing the delivery of new homes across the borough
Bertrand street	Bit of a sad playground in wrong place close to main road..	Community infrastructure	This comment will be passed to colleagues in Parks, Sport and Leisure The Council will continue to support investment in its parks and open spaces. Further details are set out in the Parks and Open Spaces Strategy.
Buckthorn Cutting	Why is this beautiful place not included in the Lewisham plan as a Green Space. It should be recognised as such and have MOL status as some protection from development.	Green Infrastructure	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions

Scout Hut	Deeply disappointed that Lewisham have not been listening to the local community in wanting this scout hut recognised as of important cultural heritage.	Economy and culture, sustainable design, High quality design, Heritage	The Local Plan aims to designate Buckthorne Cutting as Metropolitan Open Land therefore providing the highest level of protection a development plan can designate on a Green Space The Local Plan aims to provide essential physical, community and green infrastructure needed to support the growth of sustainable places by coordinating investment through CIL funding and developer contributions

Lewisham Local Plan 2022

Regulation 18 consultation statement

Appendix 5 – Seldom Heard Groups and Hard To Reach Groups consultation feedback report

May 2022

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Introduction

The new Local Plan will shape Lewisham to 2040. Its aim is to establish a shared vision for the future of Lewisham so the more people are involved and share views, the better the aspirations of our diverse communities will be reflected.

Last year, during the COVID-19 restrictions, over 1,400 people joined a borough-wide digital consultation to help inform Lewisham Council's new Local Plan. Not everyone could join digitally and whilst the overall response rate to last year's public consultation was strong, it highlighted a number of issues that the Council wanted to address for the Local Plan, but also to better improve how we engage with Lewisham's diverse communities more generally.

The Planning Team took the initiative to hold a second round of consultation to specifically hear from those who don't usually share their views with the Council. This new phase of targeted consultation will not only inform the new draft Local Plan but will help ensure the Council's overall approach is more inclusive.

As well as digital exclusion, we know there are lots of reasons why people's views aren't heard during public consultation including disability, ethnicity, sexuality, mental health problems or financial circumstances. Those facing homelessness, refugees or displaced people may also not be in a position to contribute.

As Covid-19 restrictions were lifted, officers were able to talk to people in-person at local community groups and events in community spaces, so a series of targeted sessions were planned to encourage local people who wouldn't usually participate in public consultation to share their views through an informal conversation with the team.

The objectives for this new programme were to broaden the reach of the new Local Plan consultation to include views from seldom-heard audiences - aiming for at least 40 percent to be those who have never taken part in consultation with the Council - offering a safe, welcoming environment for conversation.

Part One: Approach

We planned a carefully targeted approach focusing our publicity and engagement on networks and groups where we are likely to reach our target audience.

In-person conversations took place in accessible locations across the borough where we could meet people in spaces where they feel comfortable and at ease to talk openly. In every instance, this meant going out to planned events rather than hosting events and hoping people would seek us out.

At the start, we hoped to speak to at least 100 people with the aim to ‘understand rather than to be understood’. We contacted over 50 stakeholders plus all elected councillors at Lewisham Council to help refine our priority groups and events.

Not only did we hope to gather insights to inform the Local Plan, but we sought to make long, lasting connections that would help shape future public engagements.

Target audience

Lewisham’s population growth is rapidly accelerating and young people make up a significant and growing demographic group (one in four people are under 19). Overall, 46% of the population are from a Black, Asian or Minority Ethnic background, but this rises to over 75% among school children. Lewisham is the 15th most ethnically diverse local authority in England.

Reflecting this diversity, the Planning Team broadened the scope of consultation for this programme to seek views from a specific target audience, local people from Black African, Black Caribbean, Asian and Minority Ethnic background; young people aged 18-25 and other seldom-heard groups specifically those with disabilities, those identifying as LBGBTQ+ and refugees. These groups of people were among the least likely to contribute to the previous consultation on the Local Plan and hearing their views was therefore important.

To do so, the team made contact with community leaders across the five Local Plan character areas, to organise consultation sessions and connect with related user groups. For example, the team managed to reach young people under 18 by attending the monthly Bank of Things meeting led by the Young Advisors.

Gathering feedback

Feedback was gathered from two sources. Firstly, from conversations during in-person events which were occasionally captured on feedback forms but more likely from notes taken by officers during and after informal conversations. Secondly, from the digital survey which was shared by email to stakeholders and available for those attending consultation sessions via a QR code or web address as a way for people to answer questions in their own time.

Our feedback analysis therefore covers insights from responses gathered from three different sources: printed surveys, digital survey entries, and conversations tracked during consultation events.

Event materials

For each event, a large display board showing a map of Lewisham was used as a focus for discussion. This was a useful conversation starter and provided a focus for conversations to talk about neighbourhoods and connections.



Figure 1. Photos of events at the Green Man and Bank of Things (left to right)

Printed PDF versions of the five character areas (Lewisham North, South, Central, East and West) were provided to consult and help attendees learn about proposed plans for their local area.

Feedback forms were also available.

Team

The consultation team was formed by members of the organisation Team Catford, a local engagement and place-making team; along with the Director of Planning; Planning Policy officers; and a former Young Advisor. For more information about the team, please email localplan@lewisham.gov.uk.

Feedback questions

Feedback questions were focused on four macro topics highlighted in the survey, titled as follows: “your neighbourhood” (question 1 to 11) and “your home” (question 17 and 18); “your outdoor space” (question 12 to 16); “how you move around” (question 19 and 20) and “climate emergency” (question 21 to 24).

The questions were straightforward and written to create engaging conversations on the topics listed above. Specifically, the definition of “your neighbourhood” included questions to understand things that consultees liked or disliked from the places they live, together with how safe they feel about moving around and how often they visit a local town centre.

On a smaller scale, two questions were asked about people's homes, specifically about the things they would like to improve within their current place and also inviting people to describe their ideal home to live in.

The third topic was about going outdoors, with questions seeking to understand more about what it means for people to go out and visit local parks along with perceived strengths and weaknesses of the borough’s green infrastructure.

"How you move around" was the fourth topic within the survey, and it sought to identify preferred modes of transport along with things that would make people’s travel easier.

The last topic related to Lewisham's declaration of a climate emergency. Here we asked questions to better understand people's awareness of and views on the changing climate, to learn which aspects of climate change primarily affects Lewisham residents and what people think should be done at a neighbourhood level to address this issue.

A copy of the survey is included in Appendix A.

Part Two: Reach

Overall, the team spoke to 200 participants in-person with over 90 survey responses.

Almost 97% of participants had never participated in public consultation with the Council before (see Figure 2).

By location, views were shared from individuals evenly spread across the five Local Plan character areas - **Central** (Catford, Hither Green and Lewisham), **East** (Blackheath, Grove Park and Lee), **West** (West: Brockley, Crofton Park, Forest Hill, Honor Oak, Ladywell, Telegraph Hill and Sydenham), **South** (Bellingham, Downham and Bell Green) and **North** (Deptford, North Deptford and New Cross).

Around 10% of survey responses were shared online via the digital survey.

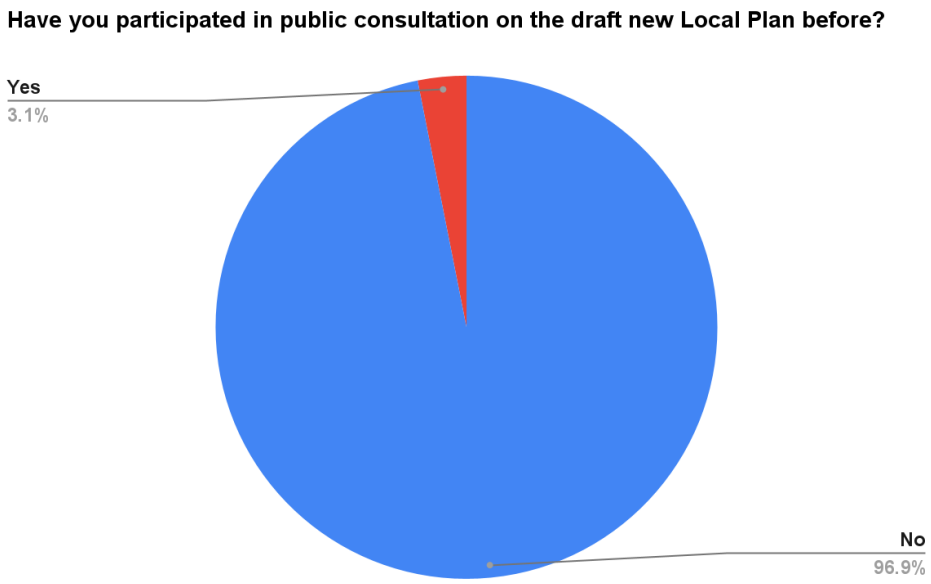


Figure 2. Pie chart showing participation in previous public consultation

Events

10 consultation events were held in places and places of interest around the district, including one held virtually, as defined by our key audience. Some of these locations are outlined in the map (see Figure 3) and include public libraries, the civic suite,

community hubs, a local market, and a food bank.

Participants were encouraged to fill out the survey and share their comments with the consultation team. Later, the team compiled all data into a single database to undertake the feedback analysis outlined in Part Three.

Alongside the core consultation team, planning policy team members joined each session and were able to provide in-depth information on local planning issues.

Conversations were spontaneous and free-flowing with members of the team loosely following the themes and questions from the survey to elicit insights from participants. Each conversation lasted around 10-15 minutes allowing in-depth, meaningful views to be shared and this led to detailed and specific issues to emerge.

Events held are detailed below.

- **Monday 21st March**, 5pm - 7pm at Bank of Things, Unit 19, Lewisham Shopping Centre
  Key audience: Young Mayor Advisors

- **Tuesday 22nd March**, 11am - 2pm at Deptford Lounge
  Key audience: general public

- **Thursday 24th March**, 11am - 2pm at Downham Library
  Key audience: general public

- **Friday 25th March**, 9:30am - 11:30am at Irish Centre
  Key audience: families

- **Sunday 27th March**, 10am - 4pm at Catford Food Market
  Key audience: general public, interest groups

- **Tuesday 29th March**, from 11am - 2pm, Lewisham Library
  Key audience: general public

- **Tuesday 29th March**, from 5pm - 7pm, Phoenix Community Housing at Green Man
  Key audience: women's residents group

- **Thursday 31th March**, from 5pm - 7pm, Lewisham BME Network, virtually via Teams
  Key audience: BME groups
- **Monday 4th April**, 5pm - 7pm at Bank of Things, Catford Civic Suite
  Key audience: Young Mayor Advisors
- **Thursday 7th April**, 12pm - 2pm at Kathy's Place
  Key audience: volunteers, general public

The large map displayed at events shows the geographical location of these events - see Figure 3 on the following page.

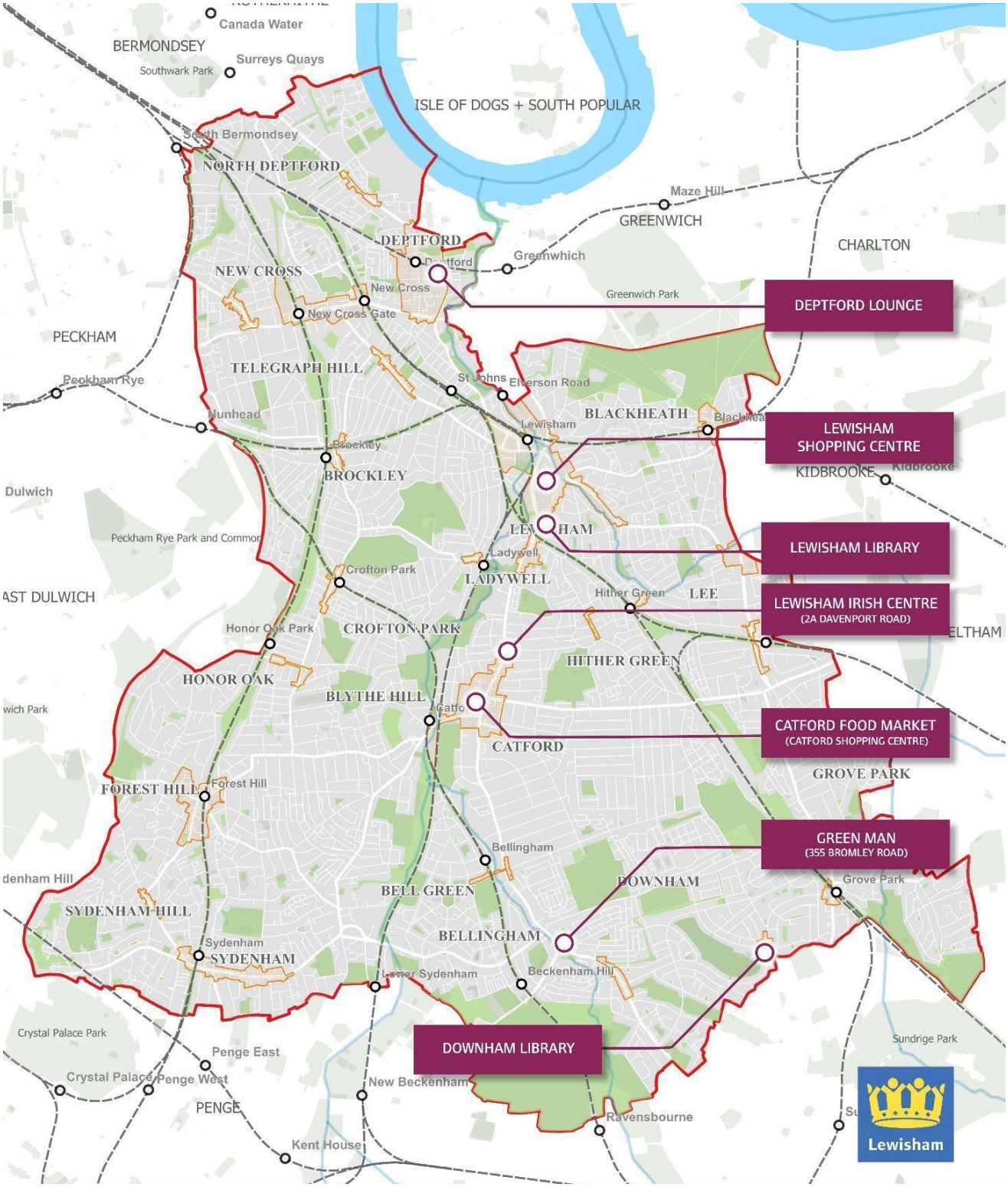


Figure 3. Large map displayed at events

Demographics

To broaden the reach of the Local Plan consultation to include views from our target audiences - young people aged 18-25, people from a Black, Asian and Minority Ethnic background as well as specific seldom-heard groups including refugees, people with disabilities and those identifying as LGBTQ+ - we set ourselves a target of at least 40 percent response from these audiences.

In addition to questions on issues relating to the Local Plan, we asked questions that allowed us to build a picture of the demographics of respondents.

A younger response
We found that **65%** of the consultees were **under 40s**, with **30%** under 29 years old, including those under 18, and **35%** within 30 and 39 years old.

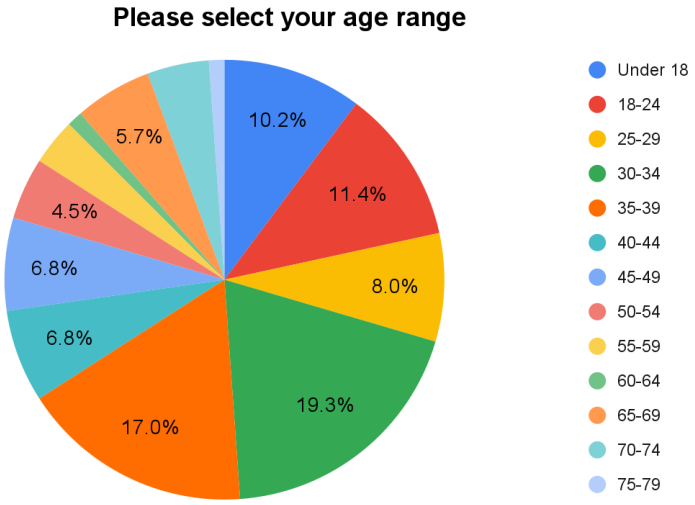


Figure 4. Pie chart showing the age of consultees

We effectively reached this audience through two targeted events hosted by the Young Advisors, however because we generated so much engagement overall, the proportion of responses from those within this age range was just over **11%**.

The remaining **35%** were over 40s, with the highest representation between 45 and 49 years old.

Reflecting Lewisham's diverse ethnicities
We found that 58% of consultees were from a Black Caribbean, Black African, mixed or multiple ethnic background or any other White background. This exceeded our overall target and allowed for a richer, more representative view by ethnicity.

Survey responses show that **24%** were English/Welsh/Scottish/Northern Irish/British, **22%** Caribbean, **18%** African, **12%** any other white background and **6%** Any other mixed or multiple ethnic background.

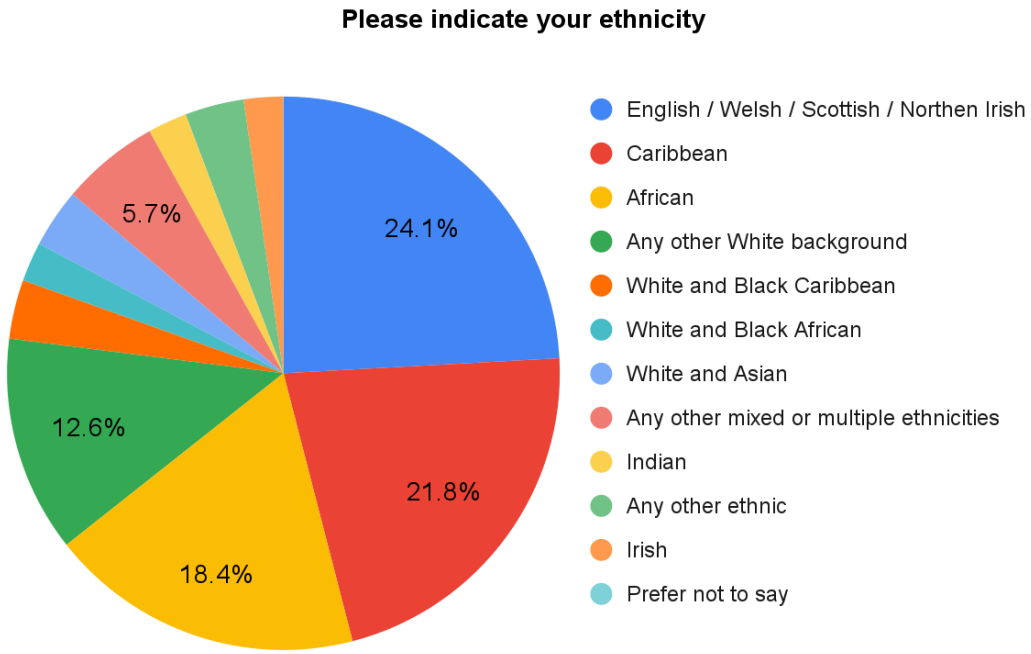
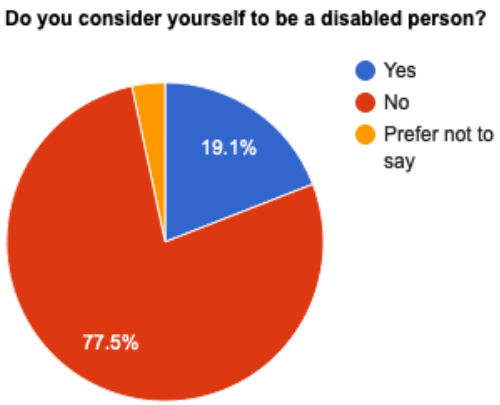


Figure 5. Pie chart showing the ethnicity of consultees

People with disabilities

We found that 19% of consultees considered themselves to have a disability, with 38% of these describing it as cognitive or learning disability or difficulty. We gathered a number of responses which raised issues specific to these characteristics.

Figure 6. Pie chart showing proportion of consultees with disabilities



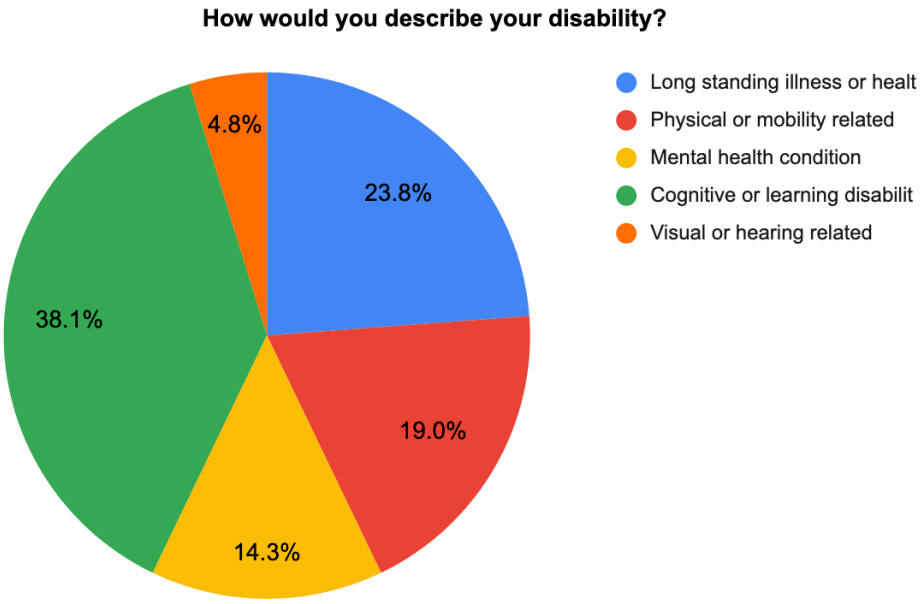


Figure 7. Pie chart showing distribution of type of disability

LGBTQ+ voices

Almost 15% of respondents identified as LBGTQ+ with a further 2.3% chosing not share their sexual orientation.

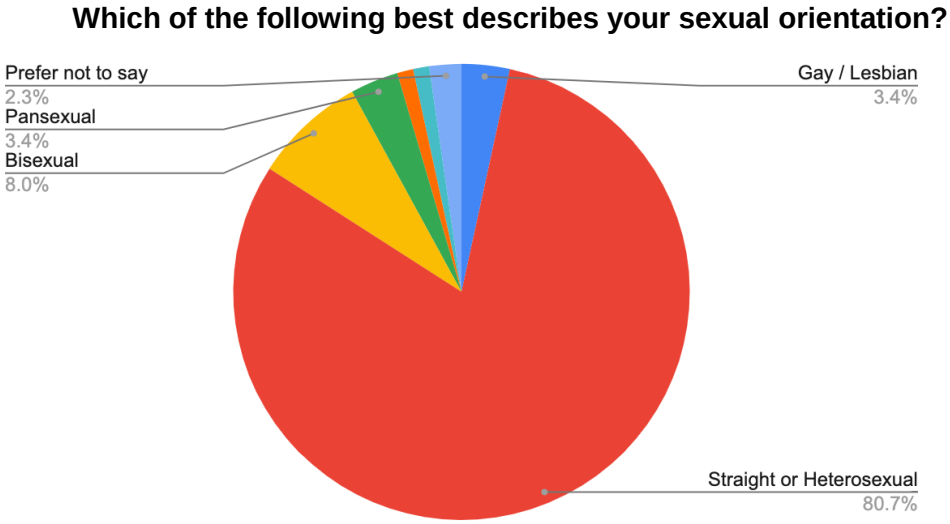


Figure 8. Pie chart showing distribution of sexual orientation

With the ongoing Ukraine conflict, our efforts to reach refugee networks within Lewisham were stalled. We therefore didn’t record any conversations or capture views from these groups.

Part Three: Emerging themes

All our conversations related to the Local Plan. We structured our questions around four macro themes - as detailed below - which allowed a range of specific issues to emerge, not necessarily widely-held views or the opinion of a majority, but views that are insightful into the views of some of the seldom-heard communities within the borough.

These views are explored below against the four macro themes on the following page.

Taking the time to listen

Perhaps the most striking observation of the entire consultation was the depth of valuable insights shared through this new approach.

A more in-depth discussion - conversations were longer, over 10-15 minutes per person and allowed individuals to warm to the team and help build a rapport. It was during these more in-depth conversations that we found the most insightful views were shared, ideas and opinions that would not surface through a survey response alone, but allowed the team to understand the position based on the individual's circumstances.

A comfortable space - some conversations just wouldn't have taken place if we hadn't gone out to groups or venues. Talking to busy carers as their children played at toddler sessions or going to small meeting places out in the borough enabled us to reach individuals who, by their own admission, would never come to a Council event.

Hearing from those who never talk to the Council - this was a very specific piece of work focusing on a distinct audience - those who have not engaged with previous consultations. Starting to understand the lifestyles, attitudes and issues of those who don't usually engage provides a richer understanding.

Consider the individual - from our conversations, we heard specific views driven by the individual's own life experience sometimes as an older person, sometimes as a female or as a young adult. We heard very striking views and attitudes that profoundly shaped individual's attitudes to living and spending time in Lewisham, that should be considered as policy is developed.

In your own words - our teams went to lengths to avoid any planning jargon, or indeed even mentioning planning policy and how the Local Plan was taking shape. Rather the focus of discussion was on issues around the Local Plan, which encouraged a freer conversation and allowed views to surface naturally.

About your neighbourhood, the place you live

This series of questions was intended to explore the way local residents perceive their neighbourhood, the place where they live, defining strengths along with weaknesses, and providing an overview of what it means to be part of Lewisham. The team noted that most of the participants did not have a clear understanding of the borough's boundary but valued key local assets, such as green areas.

We heard that people think Lewisham has a strong character with an established and diverse sense of community. In both survey responses and tracked conversations, residents told us they love to live in a neighbourhood that celebrates diversity with its eclectic and friendly mix of cultures, while retaining its own character.

When it comes to housing, many people were concerned about the quality around Lewisham of both old and new construction, particularly when compared to other boroughs. More public and affordable housing was a common theme in our conversations, especially when we spoke to residents from the north of the borough.

Conversations with carers and parents of grown up children revealed thoughts about the affordability of housing. Strong views were expressed about provision for those who were struggling with the cost of day to day life, supporting families and 'trapped' in rented accommodation. A woman explained that her daughter was facing the prospect of reluctantly having to move out of Catford because of increasing rents. She explained that her daughter worked and had a reasonable income but the rising rent levels meant that it was barely affordable to live close to her family and where she grew up going on to explain that not being eligible for social housing effectively means her living conditions were worse than many.

> *"Affordable should be accessible to those who are not on the housing list but being priced out due to high rents or not being able to afford a deposit."*

When asked "How safe do you feel in your neighbourhood?" from 1 to 10 (with 1 being the least safe and 10 being the most safe) we had an average score in our survey of 6.75, with the lowest score received mostly by people living in the central area followed by those living in the south of the borough.

Vulnerability was often described as a common feeling when going out in Lewisham. This is explored in more detail in the following section.

As for the cultural offer, many young people called for more activities and meeting places. Some people across all the areas feel excluded from what is happening in the area and have little knowledge of the cultural and geographical resources of the area.

One woman told us that there was a real need for community support through events and donations, but it was important to think about protecting people's dignity. She explained that pitching events as 'free' was sometimes not the most sensitive approach and it would be better to charge a token or variable amount to avoid people feeling stigmatised by accepting free support.

> "*Events should be a minimum charge or pay what you can afford rather than free as this can be stigmatising and make people feel insignificant."*

Your outdoor space

In this section of the survey we wanted to learn more about the local residents' experience of going outdoors, what they like and what they don't like when they visit local parks and access green infrastructure in Lewisham.

Overall, we heard a strong positive view from everyone on getting outdoors whether that was for fresh air, daily exercise, playing sports, skating, meeting friends, volunteering, going to the cinema or the theatre or reading by the river. We heard that people felt that the borough has good quality parks within easy walking distance. Many people told us they consider Lewisham's parks and green spaces their first choice when deciding on an outdoor activity. General comments about green spaces and parks pointed out a lack of benches and seating and while people spoke about older or tired playground facilities in some areas, most people recognised these spaces were well loved and well used by children nevertheless. In the south of the borough a few people noted they were keen to be kept better informed about the development of Beckenham Place Park.

Several people were keen to see improvements of green areas with a particular emphasis on consideration for different park users.

Conversations with women of all ages allowed very specific issues to emerge around feelings of safety in parks later in the evening - specifically Beckenham Place Park that is occasionally open into the evening for events and activities. It was noted that the walk towards the mansion is poorly lit with virtually no surveillance, which makes it a frightening place for women to walk alone. It was explained in two conversations that the fairy lights do not do a sufficient job of illuminating the area to make women feel confident or secure and one woman explained that there was nobody in the park able to help if she wanted to raise the alarm or request assistance. She went on to note that CCTV and surveillance would help build her confidence in using the space in the dusk and into the evening.

> *“The lighting is dreadful. I used to go to meditation classes during the winter. At night, the lights [fairy-style lights] go out completely. There needs to be an option to call for help. Sometimes I go to Kew Gardens and there's a number you can call within the grounds if you're feeling vulnerable. There's no phone number for the park - who should I call? I would feel safer if there was the reassurance that there is someone looking out for you.”*

Talking to an older woman, who had mobility issues, she explained that it was becoming harder and harder to get to parks. She noted that parking restrictions and School Streets - particularly at Manor Park Gardens and Forster Memorial Park meant that it is hard to drive and park a car close enough to be able to access the park on foot. On Beckenham Place Park, she explained she felt digitally excluded because there are only contactless payment methods and she wasn't able to pay using cash. She said she felt excluded from being able to park her car and therefore, due to her mobility issues, from using the park at all.

> *"At Forster Park, with the school street and its restrictions, means I get fined for driving up to use the parking spaces. With mobility issues, this is a problem for me. At Beckenham Place Park, you can only pay by mobile phone, which I can't do so again I'm excluded. It's the same at Manor Park - because the surrounding streets are resident parking / charged parking so I can't access the park."*

One older woman talked about a reluctance to venture outside at times of the day when school children would be using the buses and congregating around bus stops. She explained that some groups of children were intimidating and she was fearful for her own safety as well as the safety of the children within the groups. She suggested that many older people, particularly women, chose not to use buses at these times of the day.

> *"School children and older people don't mix well on the buses. Older people go home when the children come out of school - we can't get on the bus. It is not welcoming when they're crowding on the pavements and by the bus stops. It's intimidating. I think they've staggered the school finish times but it's still a problem. It is not safe for the children either - ex students and others - who mix with more vulnerable children."*

A number of same sex couples that we spoke with in House of Catford said they didn't fear being robbed but did fear a homophobic attack. This suggests that the definition of community safety and the measures that are considered to improve safety should be broadened to incorporate all aspects and perceptions of safety.

Moving around

Here we asked Lewisham residents to share their preferred means of transport when commuting or moving around the district along with what could help enhance their travel experience.

In response to the question "How do you move around?" most consultees responded with a preference to walk or use public transport (bus and train). Responses suggest that 1 in 3 own a car and use it for their travel, with 1 in 5 relying on bicycles for their travels. One of the most common criticisms of neighbourhood travel we heard related to traffic and congestion, which for many is the first thing in their neighbourhood that needs improvement.

Some people pointed out the low frequency of buses in the south of the district and the need for more frequent train connections to the city centre.

We heard some safety concerns for both pedestrians and cyclists who feel discouraged in moving around in certain parts of the neighbourhood, particularly in the areas around the Central Area, where some have suggested the need for improvements to the current road layout, improved traffic light system when crossing roads along with improved cycle paths.

Overall, most people believe fewer cars would make the transportation experience much better.

Climate emergency

Two questions in the survey focused on the climate emergency. The section was introduced by the question "Did you know Lewisham has declared a climate emergency", which allowed the conversation to explore familiarity with this pledge, strength of feeling towards climate commitments and awareness of the ongoing actions taken by the Council.

The results made it possible to understand the impact of this problem, both on the personal and community spheres, exploring ways to address and raise awareness at a local level. In response to the question “How much do you care about this issue?”, on a scale of 1 to 10 (with 1 being very little and 10 being very much), respondents indicated high levels of concern with an average score of 8.

Both the short and long-term consequences of a changing climate were highlighted. Among them, many people mentioned air pollution and all the consequences that this generates for people with existing health problems, such as asthma. Some have mentioned the mental health consequences, highlighting the anxiety and insecurity brought by climate change, particularly when thinking about future generations.

Some people talked about anticipating unexpected weather conditions as an obvious consequence of the climate emergency and expressed worry about facing unpredictable events such as floods or extreme heat along with overall long-term impacts on the planet. When asked to provide a way to address this problem at the neighbourhood level, 1 in 5 people believe that everyone should recycle more and not rely on plastic.

This feedback was followed by other lifestyle changes that people felt could make a difference which included using sustainable modes of transport (1 in 8) and changing eating habits (1 in 10). Some consultees highlighted how actions from a Council perspective, such as better and accessible communication, can raise awareness and consider this issue as a priority. Some respondents stated that this can influence the decisions of organisations in supporting sustainable practices, for instance by providing more green jobs.

A few women talked about expectations from the Council on better communications about climate change, explaining that they hoped for more information about what could be done and more information within communities suggesting pop-up stalls or mention of initiatives within regular communications.

“I think it's being addressed on a superficial level by the Council. They're not doing much on the ground. Would like to know more about what can be done. The targets and ambitions seem unrealistic.”

One woman went on to explain that she felt the Council is trusted and in a strong position of authority and that they should capitalise on this to explain what individuals can do to support the effort. She noted that the recent mailer about solar panels didn’t really work and many of her friends and neighbours actually thought it was a ‘scam’ She explained that if the Council had explained the rationale for choosing this partner and detailed the benefits of the scheme more clearly more people would have been willing to consider the offer.

“The Council should have explained this better. They should send us information about what solar panels are, what types are available and why it helps. They should explain why they chose the preferred supplier and reassure residents about the offer. People need to be educated about it otherwise it looks like a scam.”

Appendix A - copy of digital survey

Shape the future of your local area

Lewisham Council has a role in shaping the places we live. A new Local Plan is being prepared to shape Lewisham to 2040. We want local voices to be heard in this vision, especially those people who haven't shared views already. Please take a moment to answer a few questions that will help us better understand what's important to you and your local area.

1. Have you participated in public consultation on the draft new Local Plan before?
   [ ] Yes
   [ ] No

Let's talk about your neighbourhood - the area where you live

2. Do you live in Lewisham?
   [ ] Yes
   [ ] No

3. Which area best describes where you live?
   [ ] Central: Catford, Hither Green and Lewisham
   [ ] East: Blackheath, Grove Park and Lee
   [ ] North: Deptford, North Deptford and New Cross
   [ ] South: Bellingham, Downham and Bell Green
   [ ] West: Brockley, Crofton Park, Forest Hill, Honor Oak, Ladywell, Telegraph Hill and Sydenham

4. What's your connection to the local area?
   [ ] Live here
   [ ] Work here
   [ ] Study here
   [ ] Go to school here
   [ ] Visit here

Let's talk about living in your neighbourhood. Thinking about the place and how you feel about living here.

5. What do you like?
   [ ] *free text*

6. What don't you like?
   [ ] *free text*

7. Is there anything about your neighbourhood that you think needs to be improved?

[ ] *free text*

8. How safe do you feel in your neighbourhood?
   1 - 10 *(one feels very unsafe, ten feels very safe)*

Let's talk about the time you spend in your neighbourhood.

9. Do you visit your local town centre often?
   [ ] Yes
   [ ] No

10. If yes, what do you go there for?
    [ ] *free text*

11. If not, why don't you spend time there?
    [ ] *free text*

12. What is your favourite thing to do outdoors?
    [ ] *free text*

13. Is it easy to do this near your home?
    [ ] *free text*

14. Do you visit local parks and open spaces?
    [ ] *free text*

15. What do you like about local parks and open spaces?
    [ ] *free text*

16. Is there anything about the local parks and open spaces that could be improved?
    [ ] *free text*

What is important when you think about home?

17. If you could live in a perfect home, what would it have or look like?
    [ ] *free text*

18. If you could improve your current home, what would you do?
    [ ] *free text*

We'd like to know how you get around.

19. How do you get around?
    [ ] Walk

[ ] Cycle
[ ] Car
[ ] Bus
[ ] Train
[ ] Other, please explain

20. What would improve or make your journeys easier?
    [ ] *free text*

Lewisham has declared a climate emergency.

21. Do you know what this means?
    [ ] Yes
    [ ] No

22. How much does this matter to you?
    1 - 10 *(one doesn't matter to me, ten it is very important to me)*

23. How does climate change affect you?
    [ ] *free text*

24. What do you think the people in your neighbourhood could do to address climate change?
    [ ] *free text*

Please indicate your gender:
Male
Female
Prefer not to say
Other gender identity (please write in)

Please select your age range:
Under 18
18-24
25-29
30-34
35-39
40-44
45-49
50-54
55-59
65-69
70-74

75-79
80-84
85+
Prefer not to say

Which of the following best describes your sexual orientation?
Straight or Heterosexual
Gay / Lesbian
Bisexual
Prefer not to say
In another way (please write in)

Do you consider yourself to have a disability?
Yes
No
Prefer not to answer

How would you describe your disability?
Physical or mobility related - such as difficulty with your range of motion, use of mobility aids such as a walking stick, crutches or wheelchair
Visual or hearing related - such as being blind, having a visual or hearing impairment or being D/deaf
Mental health condition - such as depression, anxiety or schizophrenia
Cognitive or learning disability or difficulty such as Down Syndrome, dyslexia or autistic spectrum disorder
Long standing illness or health condition such as cancer, HIV, diabetes

Do you have any access requirements?
Easy read
BSL/interpreter
Chaperone/carer present
Step-free access
Accessible toilets
Wheelchair access

Please indicate your ethnicity:
English / Welsh / Scottish / Northern Irish /
British
Irish
Gypsy or Traveller
Any other White background (please write in below)

White and Black Caribbean
White and Black African
White and Asian
Any other mixed or multiple ethnic background (please write in below)
Indian
Pakistani
Bangladeshi
Chinese
Any other Asian background (please write in below)
African
Caribbean
Any other Black, African or Caribbean background (please write in below)
Arab
Any other ethnic group (please write in below)
Prefer not to say