

Lewisham Local Plan Regulation 19 Consultation: Community Group and Resident Representations

Please use the links below to navigate this document

Alan Hall.....	3
Barbara Gray.....	10
Barnaby Johnston.....	12
Blackheath Society Management Committee and Planning Group.....	17
Corina Poore.....	23
Culverley Green Residents Association.....	27
Diana Cashin.....	34
Downham Dividend Society Community Land Trust Ltd (Tim Oshodi).....	35
Jaki Rance.....	120
Jane Ford.....	121
Jonathan Mann.....	123
Kate Richardson.....	125
Kevin Connell.....	128
xxxxxxxxxxxxxxxxxxxxx.....	129
Nicholas Blythe.....	130
Paul Malone.....	132
Richard Senior.....	135
Sydenham Society.....	136

Bell Green:

Alex Taylor.....	138
Anna Stern.....	140
Bell Green Neighbourhood Group.....	151
Cllr Liam Curran.....	164
Deone Costley.....	178
Edward Stern.....	179
Elizabeth Carlisle.....	192
Julia Web.....	193
Louise Underwood.....	206
Margaret Varley.....	208
Sydenham Hill Residents.....	209

LCA SA 12 Ladywell Playtower:

Eleanor Keech.....	211
Ewa Szczepaniak.....	212
Monika Nadolny.....	215
Stacey Lockyer.....	216

LCA SA 10 Slaithewaite Road:

<u>Alan Turpin.....</u>	<u>218</u>
<u>Andrew Moran.....</u>	<u>219</u>
<u>Benjamin Whateley.....</u>	<u>220</u>
<u>Carl Hendrickse.....</u>	<u>221</u>
<u>Dalia Smaizyte.....</u>	<u>222</u>
<u>Daniel Gibbs.....</u>	<u>223</u>
<u>Dean Pignon.....</u>	<u>224</u>
<u>Elisabeth Grellet.....</u>	<u>227</u>
<u>Emma Davis.....</u>	<u>228</u>
<u>Filomena Dellamura.....</u>	<u>229</u>
<u>Gus Newman.....</u>	<u>231</u>
<u>Katrine Moeller.....</u>	<u>232</u>
<u>Kieran Turner.....</u>	<u>234</u>
<u>Ljubica Milosevic.....</u>	<u>235</u>
<u>Manpreet Rai.....</u>	<u>236</u>
<u>Mladen Milosevic.....</u>	<u>237</u>
<u>Natasha Held.....</u>	<u>239</u>
<u>Niki Sharp.....</u>	<u>242</u>
<u>Paula Mitchell.....</u>	<u>245</u>
<u>Richard Hallam.....</u>	<u>251</u>
<u>Richard Stableford.....</u>	<u>252</u>
<u>Russell Woolley.....</u>	<u>253</u>
<u>Shashank Virmani.....</u>	<u>255</u>
<u>Sue Baker-Bates.....</u>	<u>256</u>
<u>Tanya Woolf.....</u>	<u>258</u>
<u>Wayne Duley.....</u>	<u>262</u>

Email From Alan Hall

Dear Strategic Planning,

I have raised the matters below in the Regulation 18 consultation and I cannot see that they have been addressed in full. Hence, I am submitting these detailed comments as part of the Regulation 19 consultation:

The Integrated Impact Assessment on the Local Plan published November 2020 states:

“There will also be a need to consider in-combination issues and opportunities associated with redevelopment at both Bell Green Retail Park, as the southern extent of the Pool River Linear Park, and two sites at the northern extent, namely Wickes and Halfords, Catford Road and Pool Court (proposed as a gypsy and traveller site; currently comprises a Site of Importance for Nature Conservation, SINC).

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 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 SINCR, 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 deculverting, 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.

On the proposed Gypsy and Travellers Site the document makes the specific comments:

“9.7.5 Finally, there is a need to consider the proposed strategy in respect of meeting gypsy and traveller accommodation needs.

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 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."

[Integrated Impact Assessment \(IIA\) of the Lewisham Local Plan](#)

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 stand alone policy is insufficient to comply with the London Plan.

On the section relating to London Squares, I have sent information that a London Square on Taymount Rise is absent from the Council's list and this should be included now.

Genuinely Affordable Housing

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 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.

I understand that the longstanding commitment for a railway station at Surrey Canal Road is in doubt. Lewisham Council paid for the enabling works along the old East London Line many years ago yet, no station has opened. If the tall buildings and high density are to be achieved there needs to be better public transport. The bus services currently are inadequate. Again, tall buildings and increases in density for residential uses require open space. The commitment to a [linear] park along the route of the old surrey canal need to be maintained and strengthened. Mature trees in the area should be mapped and retained where possible.

The loss of employment spaces in generally and in Deptford & Bellingham including Bell Green lacks proper justification. The London Borough of Lewisham needs employment areas. There is insufficient consideration of new employment as a solution.

Finally, the fact that the Regulation 18 consultation was conducted during a pandemic and at a time of limited communication including during an election period needs to be acknowledged. These procedural flaws are compounded by this consultation taking place simultaneously with changes to the Statement of Community Involvement and the fact that constitutional changes to Lewisham Council's planning arrangements have been agreed by the Council whilst this consultation

was underway. That is to say, the whole planning process has been in flux whilst this consultation has been undertaken. Taking all of this in account, more formal consultation is required to achieve a common understanding of all the plans and changes proposed. Therefore, this leads me to conclude that this consultation at Regulation 19 is inadequate. The plans are unsound. There is no evidence that these proposals are compliant with the London Plan nor that neighbouring local authorities have positively engaged. I trust that this letter will be forwarded to the Planning Inspectorate.

Yours sincerely,

Alan Hall

Email from Barbara Gray

Thank you for your email.

As a local resident and In the context that Lewisham has the largest Black population and 3rd largest Caribbean population in the UK, what targetted I would like the consultation to include them in a proportionate and equitable way and for the Plan to represent them and their needs in the future.

Could you please say:

- What has been the representation of Lewisham population by ethnic group of the people who have engaged with the Lewisham Local Plan.
- What targeted action has been taken to ensure a representative proportion has a voice in shaping the Local Plan to ensure it provides for the existing population and enables them to thrive.
- Whether or not there is a budget for targeted engagement and if not what action will be taken to enable targeted engagement is resourced to enable equitable voice in the placemaking of Lewisham.
- Whether there is a commitment and willingness to commission Lewisham based organisations to undertake work to extend this engagement and enable the Lewisham Local Plan to include and be shaped by the voices of Lewisham's Black residents, including the young people, in an equitable way
- What the process is for Lewisham Black organisations to secure opportunities to do the work to extend the current Lewisham Local Plan - Regulation 19 consultation

It is great to see plans are being revised to reflect changes over time
and keen to see it using the unique opportunity Lewisham has Barbara
Gray

Email from Barnaby Johnston

Please find attached my comments on proposed Policy QD4.

Response on Policy QD4 Building Heights

This policy is not sound in relation to the designation of the Building Heights identified for Bell Green and Lower Sydenham in QD4 Part C, and the designation of these areas as a 'Tall Building Suitability Zone', as identified in Figure 5.2 noted in QD4 Part D. This is due to a lack of sound justification and evidence for these designations.

Reasons for this response:

- The policy QD4, in relation to Bell Green and Lower Sydenham, is based on incorrect assumptions and judgements set out in the justifications referred to, namely the Lewisham Tall Building Study Addendum 2022, the subsequent Tall Buildings Review 2023 and policies regarding the designation of this area as an Opportunity Area (referred to in Policy TR1). These have been used as justification for the designation of a 'Tall Building Suitability Zone' for these areas, which is not appropriate or justified, at the present time.
- The Lewisham Tall Building Study Addendum 2022, identifies Bell Green and Lower Sydenham as having good suitability for tall buildings, making an assessment based on assumptions including that the Bakerloo Line will be extended to the Bell Green area within the lifetime of this Local Plan; that there will be a new station at Bell Green; and that this will be part of a 'comprehensive development' implying a development framework being in place. The study states that the site would be suitable for designation given "...the area would

be directly served by a new London Underground station with the extended Bakerloo Line. This would underpin the creation of a new town centre...” Given that both the Bakerloo Line Extension and a new station are not identified in the London Plan as being delivered in the lifetime of this Local Plan, then the ‘underpinning’ of this designation is not justified.

- The Lewisham Tall Building Study Addendum 2022, with regards to the sensitivity of the site, also identifies that “...with the exception of the impact of some individual heritage buildings, the Bell Green area is generally identified as less sensitive.” The ‘some’ individual heritage buildings include three nationally Listed structures and the impact of tall building in the setting of these Listed Structures has not been adequately considered by the study. This is contrary to the provisions of Policy QD4 Part D which requires tall buildings “preserve and enhance the significance of heritage assets and their setting”. Given that the study does not adequately address this for the Bell Green area it should not be considered ‘low sensitivity’ and it should not be used as justification for the area becoming a Tall Building Suitability Zone.
- The Lewisham Tall Building Study Addendum 2022 has defined what constitutes ‘tall’ within the Bell Green/Lower Sydenham Area and what can be considered ‘maximum heights’. This has been used directly in Policy QD4 Part C. However, in Para.2.9.3 of the study it states “the threshold of what constitutes ‘tall’ within the area is dependent on the improvements to public transport and a comprehensive masterplanning approach being carried out”. In Para. 2.9.5 of the study it states that “Given the scale of change anticipated in this location and the scale of investment in public transport, maximum height of approximately 20 storeys are considered potentially

appropriate [for the Bell Green area]”. This potentiality has not occurred and is unlikely to, with no large scale investment in public transport for this area planned or projected in the London Plan. As neither the public transport improvements or the masterplan planning framework are in place, there is no justification for the Policy QD4 to rely on the Lewisham Tall Building Study in terms of setting heights for this area.

- The Tall Buildings Review 2023 is unclear in its recommendations for the Bell Green/Lower Sydenham area. It states in Para 4.3 that “The maximum heights proposed as suitable within the [Lewisham Tall Building Study] Addendum for Forest Hill Town Centre and Lower Sydenham / Bell Green were both below 10 storeys and therefore these areas would not be considered suitable locations for tall buildings under the definition outlined above.” However it goes on to analyse Bell Green in more granular detail and comes to different conclusions, based only on “local planning knowledge and finer-grain urban analysis” but without a proper impact study.
- The Tall Buildings Review 2023 further considers Bell Green on pages 47-51. It recognises as noted above that without confirmation of the improved public transport infrastructure, there is not the justification for tall buildings as set out in the Lewisham Tall Building Study. However, without any further justification, it concludes that all buildings are still justified on the basis of suitability and sensitivity. While there may be justification for the comprehensive development of the Bell Green area, medium to high density development could be achieved within the context of a planning framework, without the need for tall buildings. The review provides no justification for retaining some of Bell Green as a ‘Tall Building Suitability Zone’ or ‘site that may be suitable for tall buildings’. It is also unclear how the Local Plan Policy

QA4 will be revised in light of this. With the justification given in the Lewisham Tall Building Study removed, the review should conclude that Bell Green's does not justify any designation for tall buildings and certainly not up to 16 storeys.

- The Tall Buildings Review 2023 acknowledges the Listed Livesey Memorial Hall has to be considered in terms of impact, however it goes on to suggest that up to 16 storeys may be appropriate in the site in close proximity to the Listed Building (defined as site BG1). This is not justified by any impact study or examination of the setting of the Listed Building. There should be a proper study of the impact of height on the Listed Building before potential heights are suggested. The Local Plan will have to be revised to take account of the Review but it would be more justified to remove all reference to tall buildings with regard to Bell Green until a planning framework can deal with the issue properly.
- It should also be noted that Bell Green/Lower Sydenham is not an Opportunity Area in the London Plan. Policy LSA4 states "Bell Green and Lower Sydenham are poised to become one of London's next Opportunity Areas and the Council will support this designation in a future review of the London Plan". However there is no current reason why this is justified as there is no funding for the transport infrastructure to make this viable and it may be decades before this becomes a reality. There is also no Planning Framework for the BellGreen / Lower Sydenham area, a prerequisite for a Opportunity Area. The Council urgently require to progress a detailed framework for the area as they have stated will be done "...to ensure coordination between landowners in the delivery of a new high quality, residential led, mixed-use neighbourhood, which will be informed by consultation with local communities and other key stakeholders". Until this has

happened the area should not be considered an Opportunity Area because the extent of the opportunity has not been defined. Policies and studies that rely on this area being an Opportunity Area as a justification for higher building heights are therefore flawed.

Applications made on the basis that this is an Opportunity Area are equally flawed as there is no Policy in place which designates this.

Conclusion

Given the above considerations, there is not sufficient justification for the Bell Green and Lower Sydenham area to be included as a 'Tall Building Suitability Zone' and all references, including reference in Figure 15.2, should be removed from the prospective Local Plan and the Local Plan Proposed Policies Map. Given this, no heights/maximum heights should be given for this area in the Local Plan and appropriate heights should be determined, as part of the development of a Planning Framework for the area, brought forward by the Council and consulted with the local communities.

Email from: Nick Patton, of The Blackheath Society Management Committee and Planning Group.

Please find attached consultation comments from The Blackheath Society on the Proposed Regulation 19 Local Plan Submission, approved by the Society's Chair and the Chair of its Planning Committee.



Registered charity number: 1196292

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

localplan@lewisham.gov.uk

cc: Blackheath ward councillors, Cllr Brenda
Dacres Paul Watts, Howard Shields
(Blackheath Society)

23 April 2023

Dear Strategic Planning

RE: Regulation 19 consultation – comments on proposed submission document and Local Plan consultation process

Broadly, the Local Plan consultation process was well run, though rather slowly, partly because of covid. Public objections/comments at the reg 18 stage were all tabulated and addressed, though we were disappointed that so many of our comments were not acted on and were marked “No change” (59 times) in the ‘Action’ column of the consolidated responses.

We were also disappointed that none of the suggestions in our comprehensive “Vision for Blackheath” were incorporated into the Local Plan. Instead, we were advised to create our own Neighbourhood Plan, a long, complex process with no assurance of ultimate success. We consider this a missed opportunity to use the Local Plan and its character areas to provide the unique area of Blackheath with a more complete and coherent vision and much-needed additional protections.

We had and continue to have problems with two specific and connected issues in the Plan:

Height

The Council consulted separately and additionally on its Regulation 18 draft policy on tall buildings by issuing a Tall Buildings Study Addendum, so that maximum building heights could be tied more closely to specific area/districts in the borough. We (and other amenity societies) responded with detailed

comments, both general and relating to our specific local areas, indicating that we thought the study and proposed requirements were insufficiently detailed, clear, and robust to ensure that tall and large buildings would not have an unacceptably harmful impact on their surroundings and residents.

Comments on this consultation were not published or responded to individually, as comments on the full draft Local Plan had been. On the contrary, the first version of the draft Reg 19 Plan was published with some maximum heights increased, without explanation or justification. It was only through strenuous lobbying of individual councillors that this draft was withdrawn just before going forward for Cabinet approval, and then amended to reduce some of the maximum heights that had been increased back down to Reg 18 levels.

There was never any public explanation of these changes, nor were the original public comments on the Tall Buildings Study Addendum ever made public or responded to. Whether or not this was statutorily required, we consider that it was a significant shortcoming of the process and undermined the Council's commitment to transparency and due process in an area of public interest and concern. We are concerned that some maximum heights, notably in Lewisham town centre, are still too tall, for reasons we have given.

Views

The Council consulted amenity societies as long ago as 2018/19 on defining appropriate local character areas and identifying local views for protection. Input on local character areas was incorporated into the draft Local Plan as a result, which is helpful - so long as areas are considered flexible/porous at the borders.

However, the views local identified in workshops, particularly of and from

Blackheath, have never been discussed further, despite prompting from us, nor have any of them been discussed in the text or incorporated into the list of protected views in Schedule 1: Strategic and local views, vistas and landmarks, despite being marked on Figure 5.11.

We have written to the Council (officers and councillors) about this. Blackheath is a major borough open space and asset. It is part of the Greenwich World Heritage Buffer Zone, which largely relies on relevant local authorities (Greenwich and Lewisham) for protection. Sadly, the skyline of the Heath has been increasingly degraded in recent years by excessively tall and/or insensitively designed towers approved and built close to it in Lewisham town centre (Lewisham) and in Kidbrooke (Greenwich).

The only view listed in Schedule 1 as relating to Blackheath is described as “Blackheath Central Point to Central London”. It is, in fact, not in Blackheath at all, despite sometimes being described as Blackheath Point: it is at the top of Point Hill in the Royal Borough of Greenwich. We have suggested that this should therefore either be removed from the Appendix or re-described and shown as being in the borough of Greenwich and outside Lewisham’s control.

Another view added at Regulation 19 stage is described as “Greenwich Park to Central London”. This is the view from the Wolfe Statue next to the Royal Observatory and it too is in the Royal Borough of Greenwich, not Lewisham. While a very important view, it is not clear why it should be added to Schedule 1 of Lewisham’s Local Plan. It is shown without coordinates.

Both these views, which each overlook several landmarks in central London as well as in Canary Wharf, Greenwich, and Deptford, are already protected by the London View Management Framework as London Panoramas. They were first designated as long ago as 1938. They overlook a very small part of Lewisham borough along its short riverside at Deptford.

No other view of or from the Blackheath (Heath or Village) is identified in the Appendix or main Local Plan text as protected, despite several being marked as local views on Figure 15.11 on page 98. Indeed, there are no local views identified anywhere in Blackheath ward, despite it containing one of the borough's major open spaces, with its highly recognizable

landmark of All Saints' Church and a unique perimeter skyline which until recently was untouched by tall buildings other than seven nineteenth century church spires.

We have sent suggestions for views to be protected, with co-ordinates and photos, to Lewisham Planning. Initially, in May 2021, it said that this would be reviewed as part of the next stages of the Local Plan process. More recently, we were told that there have been insufficient resources available to review and add protected views in the Plan.

We consider this a material omission and failure of process, given the length of time since the previous plan and list of views was approved (over 10 years) and the length of time that has elapsed since the Council commissioned ideas for protected views from local amenity societies (over 4 years). We believe that these failures leave a grave risk that the valued skyline of the Heath will be severely and irretrievably damaged over the next few years as the wave of new insensitive very tall buildings (over 75m) approval in Lewisham and Greenwich over the last 5 years is added to, because existing view protection is too weak.

Yours sincerely

Nick Patton

for The Blackheath Society

Email from Corina Poore

**Strategic Planning / Laurence House / 1, Catford Rd Catford SE6
4RU**

RE: CPZ trials and proposed expansion

Dear Planning,

I have to admit that getting any information about the Local Plan has been like getting blood from a stone, but I gather from local gossip that there are plans afoot once again, to destroy our community life by introducing a CPZ. I have heard through gossip that there are holding trails in some areas. What does this mean?

We, on *Redacted***, strongly object to and oppose the plans to have CPZ on Telegraph Hill. There are many reasons. I enclose 158 signatures acquired in only 2 days!**

1. If the council's objective is to get rid of the local families and communities and create a short-term, transient population, dormitory area then your local plan is ideal. **People with families cannot manage** without having tradesmen & women, without health workers, care workers, delivery persons, and above all without buses and public transport.
2. **The local New Cross Bus Garage would not be viable without the free parking on Telegraph Hill.** James Clitheroe of the union UNITE at the Bus Garage, who presides over a membership of about 700 workers, has said that the viability of the bus garage

would be at stake. The number of parking spaces on site are far too few to cope with their needs. Their drivers need to arrive at 3 *and 4 am to be ready for the first buses*. Other than the few who are lucky to be on a night bus route **There is no public transport for these drivers and workers to get to work**. We all like to have our crack of dawn bus arrive on time. I reiterate, they have no public transport to take them to work. They need the free parking on Telegraph Hill. If the Mayor wants the residents of the area to use public transport and leave their cars at home, then we need these buses!

3. **Families have grandparents and children to care for**, vulnerable friends and relatives who they have to visit if they are not to be totally isolated. We need to park for these things.
4. **Shopping**. I, for one, have a large family. Without my car I could not do the weekly shopping. I normally have about 6 large Sainsbury bags to take home. **I once tried to take the bus with my supermarket shopping and was told to get off** because I was taking up too much space. So **shopping and public transport do not go together**. Online shopping is expensive and they inevitably include substitutes you do not want. It is not viable or practical.
5. **Shopping parades are dying all over the country ONLY when parking is removed**. Our little shopping parade in New Cross Gate, by the New Cross Bus Garage was a huge success. We had two butchers, we had two grocers, two bakers, a small supermarket, a bank (Barclays) and a good Post office. The

arrival of the red route coupled with the elimination of the short-term parking on the north end of Pepys Road (for NO good reason) meant people were unable to stay long enough in the bank to take out a mortgage or insurance and the same for the Post Office, making both companies lose money and close down. We also lost two pharmacies as local passing trade was eliminated.

6. **We want to live in a community-minded borough, where families are prioritized.** We want to be able to visit our family without getting a ticket. We want to be able to get a sofa or boiler delivered without being refused because they do not want to carry it for miles from the '*free unloading point*' or get a fine. **Life cannot be normal or residential with CPZ.** It is for childless couples and people who are only there for short periods, often have no need for a car as a result, have no wish or need to know their neighbours or the old lady down the road who needs assistance to get to the shops, all that is irrelevant to these younger residents with no families.

7. **If that is what Lewisham ASPIRES TO, then I will sell up and leave the area, as, I expect a large number of families I have spoken to.** Maybe that is your objective?

A short comment,

Redacted

Ah, full of tall building, all empty because no one wants to live in them!

Revealing comment.

Lewisham really needs to really analyse what it wants to become. If it wants to eliminate residential communities and families living here, then it is clear that these local plans will be very successful. CPZ destroys communities and family life becomes unviable.

Best regards

Corina J Poore

Lewisham Local Plan (LLP) Proposed submission document – Regulation 19 stage – January 2023

&

Proposed Changes to adopted Policies Map – Regulation 19 stage – January 2023

Representations by Culverley Green Residents' Association, April 2023

Proposed Policy / Policy Map Objection

Culverley Green Residents' Association (CGRA) is responding to the LB Lewisham consultation on the above documents with an objection to the following:

LLP Policy LCA1 - Central Area place principles

LLP Policy LCA4 – A21 Corridor

LLP Site Allocation 19 - Laurence House and Civic Centre

LLP Site Allocation 22 - Ravensbourne Retail Park

LLP Policy QD4 – Building Heights

LLP Schedule 12: Tall Building Suitability Zones – Table 21:12

LLP Proposed Changes to the adopted Policies Map: Section 14: Tall Building Suitability Zones
– for Catford (page 91) & for Bellingham (page 92)

Please Note: In preparing these documents for public consultation, LBL Planners have not cross referenced the sites referred to in the latter above policy / schedule and plans with their references in the earlier site allocation policies, as **needed for easy navigation and reference by the public**. Each “Tall Building Suitability Zone” plan in the **Proposed Changes to the adopted Policies Map Section 14** should be given a Plan Number, and each site within each plan a reference number which is the same as appears elsewhere in the Local Plan for site allocations. **That is BASIC TOWN PLANNING CONSULTATION** necessity which has been omitted.

Accordingly, for the avoidance of doubt, the two sites in respect of which these CGRA representations are made are as follows:

LLP Policies Map: “Catford” plan: within this, the site is the one referenced in the **LLP Schedule 12: Tall Building Suitability Zones Table 21.12** as:

“Laurence House and Civic Centre with Rushey Green Telephone Exchange : 12 Storeys”

This site appears in **LLP Section 14 Lewisham’s Central Area Figure 14.4 Site Allocation Plan** with a number but also a slightly different title as:

“Site 19 Laurence House and Civic Centre”

LLP Policies Map: “Bellingham”: referenced in the **LLP Schedule 12 Table 21.12** as:

“Ravensbourne Retail Park: 10 – 12 Storeys”

This site appears in **LLP Section 14 Lewisham’s Central Area Figure 14.4 Site Allocation Plan** as:

“Site 22 Ravensbourne Retail Park”

Can future consultation please refer to a site consistently with one reference number and name.

Commentary

The objection is that the plan is not sound in respect of the following proposed elements:

- | | |
|----------------|--|
| A Group | Policies LCA1 Central Area place principles & LCA4 A21 Corridor and associated LLP Site Allocation 19 Laurence House and Civic Centre and LLP Site Allocation 22 Ravensbourne Retail Park |
| & | |
| B Group | Policy QD4; associated Schedule 12 Table 21:21 and Proposed Changes to the adopted Policies Map Section 14 – Tall Building Suitability Zones (pages 91 and 92). |

The reasoning, which is set out below, is that:

A Group - these proposed policies and allocations fail to give sufficient weight to the Council's legal obligations for the preservation and/or enhancement of heritage assets potentially impacted by the development being promoted, contrary to the requirement of NPPF Paragraph 190 that development plans should set out a positive strategy for the conservation and enjoyment of the historic environment;

B Group – this policy and associated schedule and plans setting out the acceptable maximum heights shown, of 12 and 10-12 storeys respectively, are inconsistent with proposed policies HE1, HE2 and LCA 3, (and additionally with LCA1 and LCA4 as they should be worded), because they indicate heights for buildings which have not been assessed in terms of heritage impact as required by NPPF Paragraphs 194 and 195. These require the LPA to take this assessment *“into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”*

Put bluntly, the “A Group” elements **fail to adequately incorporate the assessment** of the significance of the heritage asset (in this case the Culverley Green Conservation Area (CGCA)), and the potential impact of new development in the support for development on Sites 19 and 22, (both within the CGCA and its setting), whilst the “B Group” elements fail to follow the required procedure, and thus **put the cart before the horse**, in specifying acceptable storey heights for both sites that are considerably greater than their respective 2 – 4 storey contexts, before any assessment of specific proposals. Both of these failures of procedure are contrary to the policies of NPPF Chapter 16 – *“Conserving and enhancing the historic environment”* This is therefore contrary to NPPF Chapter 3 – *“Plan Making”*, in particular Paragraph 32 under *“Preparing and reviewing plans”*, which requires Local Plans to be informed in their preparation by a sustainability appraisal that:

“should demonstrate how the plan has addressed relevant ... environmental objectives... Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.”

To be ‘sound’ the plan must, inter alia, be:

“b) Justified – an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence;

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in [the NPPF] ...”

Thus the CGRA contend that the absence of proper assessment of the impact of (what the plan itself defines as) “tall buildings” within the CGCA for Site 19 and in the immediate setting of the CGCA in both Sites 19 and 22, on the significance of that heritage asset, does not satisfy the procedure in NPPF Chapter 16. Accordingly, the assignment of acceptable storey heights for new development on both sites is premature and not justified by evidence, and thus the policies, schedules, plans and site allocation text relating to Sites 19 and 22 are unsound as defined in NPPF Paragraph 35 ‘b’ and ‘d’.

The CGRA case is strengthened by the other **Strategic** objectives and policies and their supporting text in the Reg 19 LLP, which do indeed stress the importance of the assessment of impact on the historic environment as follows (**CGRA highlighting**):

Starting with the **Strategic objectives**, the intention is to manage development to protect, inter alia, **existing townscape and heritage**:

3.6. Lewisham Local Plan – Strategic objectives

F Celebrating our local identity

13 Retain, reinforce and help shape the distinctive character and identity of Lewisham’s neighbourhoods and communities, including ... 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 ensure new development is designed, constructed and maintained to a high quality standard.

14 Make the optimal use of land ... and, where appropriate, facilitate the regeneration and renewal of localities within the London Plan Opportunity Areas at ... Catford, ... and through this process manage change to reinforce and build upon local character, whilst delivering transformational improvements to the environment ...

15 Set a positive framework for conserving and enhancing the historic environment, and promoting understanding and appreciation of it, including by working with local communities and community groups, ... to sustain the value of local heritage assets and their setting,

The LLP makes clear that the capacity of a site must be established individually having regard to the relevant policies, as highlighted below:

13 Lewisham’s neighbourhoods and places

Delivering the spatial strategy and meeting local needs

13.7. To help to facilitate Good Growth in Lewisham the Local Plan includes site allocation policies. These are detailed policies for strategic development sites that are critical to the delivery of the spatial strategy. ...

13.8. Each site allocation includes information on the development capacity of a site for different types of land uses. The process for identifying sites and the methodology used for setting capacity figures are set out in the “Lewisham Local Plan: Site Allocations Background Paper” – this should be referred for further information. 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. ...

The over-arching **Strategic policy** responds to the above Strategic objectives of the Local Plan:

OL 1 Delivering an Open Lewisham (spatial strategy)

A. The Council will work positively and alongside local communities, and community groups, and other public and private sector stakeholders, to realise the Vision for Lewisham , and to address the strategic objective for ‘An Open Lewisham as part of an Open London’. Good Growth will be delivered in the Borough by:

*a. Directing new development to ... Lewisham’s Opportunity Areas of ... Catford ... and carefully managing growth in these locations **in response to local character.***

*d. Directing new development along the A21 Corridor and other strategic Growth Corridors to support growth, along with using the Healthy Streets Approach **to enhance the quality of places** ...*

*g. Ensuring all new development proposals follow the design-led approach to make the optimal use of land, respond positively to local distinctiveness (**including the historic**, cultural, natural and built environment), ...*

In the supporting **Explanation**, under ‘Growth Corridors’, a caveat has been added with the explanation “**Commented [NE40]: Respond to consultation – reflect on the need to carefully manage growth where heritage assets concerned**” to read as follows:

*It is acknowledged that some Growth Corridors include **Conservation Areas and other heritage assets, or fall within their setting, and therefore growth will need to be carefully managed in a way that responds positively to local historic character.***

The CGRA is pleased to see that its previous response on the A21 Corridor Framework consultation has been acknowledged and taken into consideration in this Reg 19 version of the LLP. The CGRA also supports the approach to site assessment advocated in the Explanation for this over-arching policy, as clearly explained as follows:

*5.3.24. The Local Plan requires all new development to be delivered through a **design-led approach**. 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 the **unique and valued features** of our neighbourhoods remain at the heart of the spatial strategy, and are fully considered in planning decisions.*

The CGRA also highlights **further LLP strategic policy support** of its contention that neither a site-specific allocation nor a policy on building heights should identify acceptable heights on sites within or adjoining conservation areas (including Sites 19 and 22), since in doing so, they cannot take account of the **implications** of the proposed scale of development on the heritage assets and their settings thereby failing to fulfilling the requirements of the following policies:

Part 2: 5: High Quality Design

Policy QD1 Delivering high quality design in Lewisham

Using the design-led approach

- A. Development proposals must follow a 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 site and its 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 positively to the local context, along with the optimal use of land to support the delivery of the spatial strategy for the Borough.

Distinctive and valued places

- B. Development proposals must demonstrate an **understanding of the site context** and respond positively to Lewisham's local distinctiveness by providing for buildings, spaces and places that reinforce and enhance local character. This includes **the special and distinctive visual, historical, environmental**, social and functional qualities of places that contribute to local character, identity, sense of community and belonging
- C. To successfully respond to local distinctiveness development proposals must be designed to address:
- a. Natural features including trees, landscape, topography, **open spaces and waterways**;
 - b. The prevailing or emerging form of development (including urban grain, **building typology**, morphology and the hierarchy of streets, routes and other spaces);
 - c. The proportion of development (including **height, scale, mass and bulk**) within the site, its **immediate vicinity and the surrounding area**;
 - d. Building lines along with the orientation of and spacing between buildings;
 - e. Strategic and **local views, vistas** and landmarks;
 - f. Townscape features;
 - g. The **significance of heritage assets and their setting**; and
 - h. Architectural styles, detailing and materials that contribute to local character; and
 - i. Cultural assets.

Part 2: 6: Heritage

Policy HE1 Lewisham's historic environment

The Council will seek to preserve or enhance the value and significance of Lewisham's historic **environment and its setting** by:

- 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;
- f. Requiring development proposals to **demonstrate** that all reasonable measures have been **investigated** to avoid harm to heritage assets;

Policy HE2 Designated heritage assets

Conservation Areas

- B. Within Conservation Areas, development proposals will only be supported where they:

- a. *Preserve or enhance the special character and appearance of the CA having particular regard to:*
 - i. **Townscape**, buildings, roof lines and the relationships between buildings;
 - ii. **Scale**, form, ...

G. Development proposals on sites adjacent to a CA must not have a negative impact on the **setting** or significance of the CA;

Part 3: 14: Lewisham's Central Area

Policy LCA3 – Catford major centre and surrounds

D Development must be **designed to provide** for an appropriate transition in **scale, bulk, mass, height** and character from residential neighbourhoods around the centre, ...

F Development proposals must respond positively to the historic and cultural character of the town centre and its surrounds whilst preserving or enhancing the significance of heritage assets, including by:

- b. **Addressing the relationship of new development with the Culverley Green Conservation Area to the south.**

The CGRA contends that all the above quoted strategic policies demonstrate that identification of acceptable storey heights for Sites 19 and 22 via policies / schedules / plans / site allocations in the LLP is simply not appropriate prior to a detailed assessment of the impact of a specific scheme on sites 19 or 22, in terms of, inter alia, the significance of the CGCA and its setting. This strengthens the CGRA's claim that the elements to which the objection relates fail to accord with the other proposed strategic policies and national policy as set out in the NPPF.

CGRA contends that the Strategic objectives and policies quoted above that require schemes to demonstrate that they have been designed to preserve or enhance the significance of the CGCA and its setting do appropriately fully reflect the requirements of NPPF Chapter 16. Thus they justify the CGRA's claim of unsoundness of the above quoted policies / schedules / plans / site allocations to which objection is made, covering new developments on Sites 19 and 22, given their inadequate acknowledgement of appraising the impact of 10 – 12 storey development on the significance of the CGCA heritage asset.

Comments on the elements of the LLP the subject of this objection

In summary, specific comments by CGRA on the policies and other instruments pertaining to Sites 19 and 22 are as follows

LLP Policy LCA1 – Central Area place principals

Part D - ...*"sensitively designed and high quality development on small sites will be supported where this responds positively to the area's local and historic character."*

CGRA note that the policy is **unsound** since there is no equivalent section covering large sites, which is certainly relevant to Site 22, if not Site 19 also. Furthermore, CGRA consider this single reference to historic character in the entire policy to be inadequate to highlight the importance of the LPA's requirement to at least protect the CGCA's character via, inter alia, undertaking a development height and massing assessment, and to reflect the requirements of the other policies quoted above which require proper consideration of heritage assets.

LLP Policy LCA4 - A21 corridor

CGRA consider that the policy is **unsound** in that it makes no reference to the need for proposed development to ensure the protection or enhancement of the CGCA, nor any cross-reference to the requirements of Policy LCA 3.

Policy QD 4 Building heights

CGRA consider the following part of this policy to be unsound:

- C. Within those locations identified as appropriate for tall buildings, the maximum height of buildings shall not normally be more than:
 - c. 39.2 meters (12 storeys) to 64.8 meters (20 storeys) in Catford
 - f. 32.8 meters (10 storeys) to 39.2 meters (12 storeys) in Bellingham and Lee Green

The contention that it is unsound is not only explained above, as being contrary to the requirements of other policies, but is reinforced by its incompatibility with the requirement of the following part of Policy QD4:

- D. Development proposals for tall buildings will only be permitted where they are in a Tall Building Suitability Zone, align with the appropriate height ranges set out above and it is **demonstrated that** the development:
 - g. Will **preserve or enhance the significance of heritage assets and their setting;**

As already explained, the reason why CGRA believe QD4 Part C is unsound is that the process of establishing the appropriate maximum height for development on a site that impacts on the setting of a conservation area must be through a design-led assessment informed by a heritage assessment. There is a fundamental difference between the impact of a tall building on the other considerations of QD4 D, such as 'a' – *will contribute to the delivery of the spatial strategy for the Borough*, versus this matter of heritage impact, for which the NPPF para 198 sets out a specific requirement. In short, whereas for some sites identified in the local plan for regeneration at a high density, it may be appropriate to indicate a maximum height, based on townscape, views and other issues, such an approach is inappropriate for sites within or adjacent to conservation areas. For this reason, the policy is unsound, being inadequately justified, not effective, (as issues could arise in delivery of schemes in compliance with this policy), and inconsistent with national policy.

For the reasons relevant to QD4, the associated schedules and plans are also unsound in respect of Sites 19 and 22.

CGRA URGES LB LEWISHAM TO REMOVE ALL REFERENCE TO ACCEPTABLE STOREY HEIGHTS EVEN IF INDICATIVE IN RESPECT OF THE SITES WITHIN THE CULVERLEY GREEN CONSERVATION AREA AND ITS SETTING.

Peter Luder BA MUP MRTPI

Culverley Green Residents' Association

Email from Diana Cashin

I would like to raise my two concerns

1. It is currently a well used retail park offering a wide variety of choice and local employment. To take this recognised success away from residents is a retrograde step. A few small shops as indicated will not be able to provide the same choice and convenience currently enjoyed at a time when all the impetus should be to achieve a '15 minute city'.

2. Were the development to go ahead the proposed height of the residential blocks is too high. A height of 4-6 storeys is the maximum to maintain a residential sky line.

Regards

Diana Cashin

Redacted


From: tim Osh [REDACTED]
Sent: 26 April 2023 06:30
To: LocalPlan
Subject: Fwd: Local Plan sound

Apologies the first submission emailed on the 25th April was an earlier version with numerous editorial mistakes. Here is the submission that was intended to be submitted:

This submission arises out of the partnership work between Downham Dividend Society CLT Ltd and 7 Fields PCN. Dr. Helen Tattersfield, the 7 Fields PCN clinical director has dedicated over 3 decades of her professional life to the health and well being of the Downham community. The PCN funded the following action research projects

his submission arises from numerous public engagement activities developed in partnership between the Downham Dividend Socieity and 7 fields Primary care network.

Examples of the work include:

 [Downham final report_28-9-2022.pdf](#)

T

 [FULL Downham Land Use Report.pdf](#)

<https://youtu.be/qguxuiq1Kw4>

<https://vimeo.com/732795269/a6fcc9eeb4>

https://www.facebook.com/greenwomanoasisproject/?view_public_for=294304178135955

which contributed to this submission:

This submission argues that the Lewisham Local Plan is unsound' in its failure to:

- recognise the unique characteristics of the Downham communities. Downham has a diverse population, but community relations have been complicated over the years <https://www.theguardian.com/cities/2019/sep/09/we-had-to-fight-the-nf-but-can-londons-first-black-housing-co-op-survive-latest-threat> . There is anecdotal evidence of increasing racial anti social behaviour with individual residents being told that '[REDACTED] the first day she moved into the area. More research is needed to identify how widespread these incidences are.
- take a strategic asset based approach to maximise the potentially significant public health, community wealth building and climate change contribution of its outstanding green and blue spaces.
- give due consideration to how a strategic approach to the Downham green spaces can significantly tackle the race health inequalities identified within the BLACHIR report which suggest with the increasing number of BAME members in Downham as set out in the Lewisham Laboratory

incorporating the recent census figures the concentrations of health inequalities are likely to be increasing.

- to develop an asset based strategy to maximise the public health, community wealth building and climate change contributions of the Green and Blue spaces that impact 7 fields PCN as set out in



FULL Downham Land Use Report.pdf

<https://vimeo.com/732795269/a6fcc9eeb4>

- Align with national policy framework on sustainable development through developing a health focused supplementary planning document to consider:
- a trauma informed approach to the regeneration of Downham's underinvested Green and Blue spaces.
- the best investment vehicle for the Green and blue spaces in and around Downham
- maximise the opportunities to strengthen the social capital of the area
- Be ambitious in its Parks and Open Spaces strategy Parks and Open space strategy 220 - 2025 sets out relatively modest interventions. Downham forms part of the Southern sub-area (see pp 52-54). The following extract of the Improvement Strategies recommended for existing and future projects lacks a focus on considering the investment opportunities that e.g. a health focused Parks Trust could attract as set in the Downham Green space land use report:
 - *The parks of a 'fair' quality, named above, should be prioritised for improvement.*
 - *To improve play provision for residents within the area of deficiency in access to Playspace, a 'pocket park' should be considered for inclusion within the area of deficiency. In addition, facilities within the nearest park – Durham Hill –should be improved.*
 - *Improving walking and cycling access*
 - *Signage and other walking and cycling infrastructure are recommended for the spur of The Waterlink Way connecting The Waterlink Way to Beckenham Place Park.*
 - *An additional bridge across the Catford Loop Railway Line between Beckenham Place Park and Summerhouse Fields should be considered.*
 - *Access from the Areas of Deficiency in Access to Play in the east of the southern sub-area to the nearest play facilities at Durham Hill should be improved.*

A health focus SDP for the area green and blue spaces of the area is likely to increase the soundness of the Local Plan through:

increase alignment with the Council's stated aims of the POS' strategy and Local Plan through creating a clearer focus on how to maximise the PH, CWB and CC outcomes through Downham's outstanding green and blue assets In setting out the strategy, we are stressing the importance we place on our desire to involve both partners and the whole community in shaping the future of our open space. We recognise that open space affects the lives of almost everyone that lives and works in the borough, and believe that sustainable management and community involvement of our open spaces offers considerable potential for helping to make Lewisham the best place to live, work and learn.

These highlighted emphases of political ambition are very much reflected in the latest Regulation 19 draft Local Plan, and ought therefore to be seen as a clear alignment of both the Council's plan objectives with its other policy programmes; albeit at a boroughwide level, with very little focus on HWB, CWB and CC outcomes needing to be achieved in specific places.

- attract the significant funding available (e.g. <https://www.ukri.org/opportunity/collaborative-community-research-to-tackle-health-inequalities/>) for pilots and research projects to address the knowledge gaps identified in the BLACHIR report that impact the emerging Downham communities

as well as producing a set of community indicators that can provide the evidence based for effective regeneration interventions

- develop a partnership which builds a consensus on the evidence based solutions most likely tackle the social determinants of ill health identified by Marmot
- maximise the climate change contribution opportunities Downham's green spaces offer for example most of Downham's housing stock is approaching 100 years of age and there is significant scope for ground source energy and battery storage solutions which are yet to be explored.

This submission arises out of the partnership work between Downham Dividend Society CLT Ltd and 7 Fields PCN. Dr. Helen Tattersfield, the 7 Fields PCN clinical director has dedicated over 3 decades of her professional life to the health and well being of the Downham community. The PCN funded the following action research projects



[Downham final report 28-9-2022.pdf](#)



[FULL Downham Land Use Report.pdf](#)

<https://youtu.be/qguxujq1Kw4>

<https://vimeo.com/732795269/a6fcc9eeb4>

19th Century maps of the area ascribe the name Mount Misery to Downham. When Downham was being constructed over 100 years ago the proposed new communities were opposed by both Lewisham wards of Hilly Fields and the London Borough of Bromley. The hostility and institutional blindness to the community needs is reflected in the Valeswood wall built to prevent Downham residents from walking to Bromley town centre.



[class wall downham.pdf](#)

The high levels of deprivation identified within the Lewisham laboratory and increasing concentration of the social determinants of ill health: <https://www.instituteofhealthequity.org/resources-reports/build-back-fairer-the-covid-19-marmot-review> Means that the existing community faces another wall of social exclusion through the cost of healthy leisure activities.

Downham was built on garden city standards when the public health impact of housing was in the foremost thinking of policy makers. The national planning policy framework adopted the UN sustainability goals and the maximisation of the public health impact of the Downham's outstanding green and blue assets need to become a focus of the Lewisham Plan. The Trust's strategy of Downham health through sport leisure and nature seeks to create a healthy garden city approach to maximising the public health impact through a social prescription model of health and well being:

<https://youtu.be/qguxujq1Kw4>

https://www.facebook.com/downhamhealththroughsport/?paipv=0&eav=AfZfVNPhbiFTESYk5XJC7fx2RExtQBSR6oXa4wXQbK4_9dOH-ZG57P_4IVCg2VgNto&r

The Lewisham Plan current lacks a focus on the significant health and community wealth contributions the green and blue spaces can make to tackling the social determinants of ill health identified by Marmot.

There is no recognition of how a health focused SPD and Parks

Trust investment vehicle can maximise the public healthcommunity wealth building and climate change contributions of over 300

acres of publicly owned green and blue space. E.g Discussions around securing investment into the

https://www.facebook.com/greenwomanoasisproject/?view_public_for=294304178135955 began with the then assistant director of education Aileen Buckton 22 years ago. In Nov 2019 the Lewisham Mayor along with senior

officers met with the trust and agreed to support the Green Woman Oasis Project up to feasibility stage. It was made very clear that there was no agreement to transfer the ownership of the publicly owned assets. However institutional inertia has meant that an asset of outstanding natural beauty has remained unavailable to the Downham community and its potential as a tourist attraction is untapped, despite Heritage Lottery inviting the Trust to a seminar to encourage a bid pre-pandemic.

A health focused SPD in combination with an investment vehicle such as a Parks Trust offers the Downham communities an evidence based approach aligned with national policy to maximise the public health, community wealth building and climate change contributions of its magnificent but underinvested green and blue spaces.

Tim Oshodi
Downham Dividend Society Community Land Trust Ltd.



[shared assets]

Building Community Wealth, Health and Wellbeing with Downham's Open Spaces

Prepare for Sevenfields Primary Care Network
by Tim Osh, Mark Walton and Stephen Hill

December 2022



Table of contents

Context to the report	4
Who is involved	4
Why we've kick started this work	5
Summary of findings	6
The Downham Context	9
Challenges	9
Policy context	12
Community Wealth Building	12
Health and wellbeing	13
Planning	15
Parks and Open Spaces Strategy	18
Assets	20
Green Spaces	20
Natural capital	22
Institutions	24
People and Networks	24
What others have done	25
Case Study 1: Parks for Health	25

Case Study 2: Parks Foundations	29
Case Study 3: Parks Trusts	32
Case study 4: Management organisations	36
Emerging models	37
Public commons partnerships	37
Ecosystems services cooperatives	39
Funding Opportunities	40
Grants from Trusts and Foundations	40
Assets	41
Renewable energy generation	43
Corporate Income	44
Individual Donations	45
Other Potential Funding Mechanisms	46
What Downham can do	48
Vision	48
Outcomes	49
How we can make this happen	51
Who should be working together	51
Planning	52
Neighbourhood Planning	53

Collaborative working	53
Collaboration to deliver projects	54
Collaboration to add value	55
Collaborating to create new management and governance models	56
Legal structures	57
Recommendations and actions	59

Context to the report

Our vision is to maximise the opportunities for Downham residents to engage in sport and leisure activities in nature whilst delivering on the area's community wealth building ambitions. The ancient woodlands, 15th century pond, mesmerising views across south London, and stunning regeneration of the West side of Beckenham Place Park mean that Downham has assets that are similar in scale to Hampstead Heath. However to maximise their contribution to community wealth building and the health and well being of Downham we need to have a unifying vision for their regeneration. This includes supportive local policies and an investment vehicle that maximises the involvement of the community alongside other stakeholders in their governance and management, and can attract the significant funds available for long term, low risk finance.



Photo credit: Timi Ajani drone footage

Who is involved

This report was commissioned by [Sevenfields Primary Care Network](#). The network includes Torridon Road Medical Practice, ICO Health Group, The Moorside Clinic, Downham Family Medical Practice, Park View Surgery, Oakview Family Practice, Rushey Green Group Practice, and Baring Road Medical Centre. It aims to transform primary care in a sustainable way that positively impacts on the health and wellbeing of the local population. It includes seven

practices in the Downham area of Lewisham who between them care for a population of approximately 80,000 patients.

It was researched and produced by:

Downham Dividend Society: a community land trust that exists to benefit the community in Downham by providing and managing housing and associated facilities, amenities and services for the relief of financial hardship and promoting and supporting community led regeneration. It is the successor body to Europe's largest black-led community self-build where eco-social housing is procured on a co-production basis and facilitates community self-build and other community-led co-production initiatives that maximise their community wealth building impact.

Shared Assets CIC: a think and do tank working to create a socially just future through practical projects that build new relationships between people and the land. Our consultancy work supports the practical creation of new business and governance models for land that create shared social, environmental and economic benefits.

Stephen Hill: an experienced public interest practitioner with a history of working in the commercial, governmental and non-profit housing sectors. He is a qualified planning and development surveyor with an MA in Land Economics and is skilled in Urban Planning and Development, Community Engagement, Strategic Planning and Infrastructure, Project Design and Action Learning.

Why we've kick started this work

We wish to develop a strategic approach to the management and use of Downham's green spaces and their associated assets, one which maximises the community wealth building and public health impacts of the green spaces, and contributes to reducing and addressing the impacts of climate change.

We want to support the development of a planning-led approach to meeting the competing needs for green space use that provides for a diversity of different uses, ensuring accessibility through design, infrastructure, connectivity, pricing, timing and location.

This might include innovation in green infrastructure development such as ground source district heating to provide for both housing and leisure use e.g. steam rooms, hot yoga,

sauna, and heated swimming facilities. Such developments could provide opportunities for long term, low risk low return investment in Downham's infrastructure.

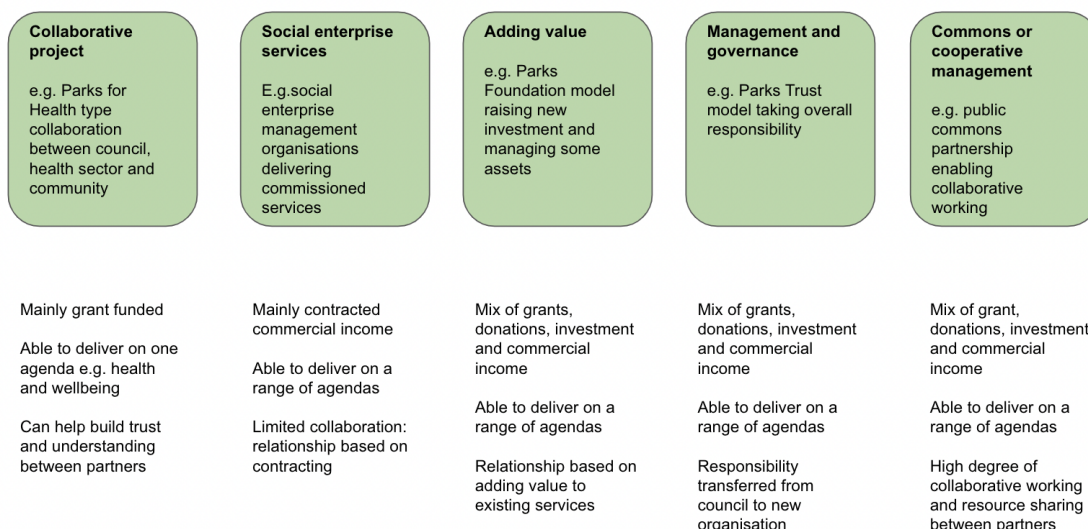
Summary of findings

The report sets out the local context in Lewisham and Downham, including the social and economic context and the local policy context with respect to community wealth building, planning, health and wellbeing and green spaces.

It provides case study examples of a range of different approaches to collaboration to improve the use and value of green spaces in ways that could meet these local policy objectives. These include:

- Collaborative projects to deliver health and wellbeing improvements through expanding the use of local parks.
- The creation of 'park foundation' models that add value through raising funds and managing assets to invest in, and animate, parks.
- The creation of 'park trust' models to provide alternative management and governance arrangements that involve local people and access new forms of income.
- The role of social enterprise management companies to deliver services that improve the quality and use of parks.
- The emergence of new collaborative and cooperative approaches to managing important community assets and land.

It also sets out a range of different established and emerging funding and investment approaches to improving parks and open spaces.



The report then sets out how these approaches might be applied in a Downham context and sets out recommendations and next steps. These include engaging the local planning process and exploring with key local stakeholders the most appropriate approaches to improving collaboration in Downham to ensure that local green spaces help to meet local health and wellbeing, community wealth building and climate change objectives.

It highlights the need to have a unifying vision for the regeneration of Downham; extensive green spaces that will enable them to realise their untapped potential to deliver on a range of local policy objectives including; community wealth building, health and wellbeing, the green space strategy, climate change and employment.

It identifies the need for more supportive local planning policies, more collaborative project development and delivery, and the creation of an investment vehicle, such as a Parks Foundation or Parks Trust, that can attract the significant funds available for long term low risk finance, stimulate local entrepreneurial activity and which maximises the involvement of the community alongside other stakeholders in their ownership, governance and management. Whilst usually based on a charitable model there is potential to explore more democratic models such as the community benefit society or community land trust models, or emerging multi stakeholder models such as Public Commons Partnerships.

The following actions are identified.

1. Local stakeholders in Downham should participate in and respond in writing to the

Regulation 19 consultation on the Lewisham Local Plan this spring, and aim to make representations to the Planning Inspector at the Examination in Public on the final draft, and which will need to be grounded in any response to the Regulation 19 consultation. This should focus on the need for local planning policy to move beyond protection and enhancement and to set out detailed links between how local land use can help to deliver other council and community priorities such as health and wellbeing, community wealth building and climate change. e.g. through the development of a Supplementary Planning Document on parks and green spaces.

2. Local stakeholders in Downham should explore the process and appetite for the development of local Neighbourhood Plan, in particular making links with other Neighbourhood Forums; e.g. Grove Park which has been identified as having the most rounded and integrated approach to the relationship between green space and health and wellbeing, both in optimising the uses of existing green space, and upping the quality of new development and non-green open spaces in which people spend much of their time.

3. Local stakeholders in Downham from the council, housing, health and community sectors should consider the different approaches to greater collaboration set out in this report. This should include consideration of their appetite, commitment and the opportunities and barriers for developing more collaborative approaches in order to bring about the improvement of Downham's green spaces to deliver inclusive and accessible health and wellbeing, climate change and community wealth building objectives.

4. Local stakeholders in Downham from the council, housing, health and community sectors should consider the potential for new ownership, stewardship and management models such as a Parks Trust. Any new model should enhance local democratic ownership and control of land and property. It should be capable of unlocking the potential of Downham's green spaces by securing new investment and catalysing new economic activity focussed on meeting the needs of the local community, whilst delivering on the council's community wealth building, health and wellbeing and climate change ambitions.

The Downham Context

Downham estate was built in the late 1920s and early 1930s. There are some large areas of open space including Downham Fields (also known as Durham Hill Park), a Woodland Walk and part of Beckenham Place Park falls within the ward. There has been an aspiration for many years to improve the facilities at Downham Fields and this featured heavily in the Downham Commonplace consultation. Whilst the constituency has one of the largest populations in the borough it is one of the least densely populated.

Challenges

Less than half the housing in Downham is privately owned with Phoenix Housing as the main social landlord. Downham has one of the highest levels of unemployment in the borough and the highest level of fuel poverty (between 14 – 32%).¹ 7 out of 12 of the area's Lower Super Output Areas are in the most deprived 20% based on the Indices of Multiple Deprivation.

51.1% of Downham residents have an ethnicity of White British (White English, Welsh, Scottish, or Northern Irish). Among those not White British, the three most common ethnicities are Black African (10.9%), Black Caribbean (9.5%), and White Other (6.0%).

Whilst Downham has a diverse population, community relations have been complicated over the years, there has been a history of tension between different groups, including overt racism. There is anecdotal evidence of a recent increase in racist anti-social behaviour.

In the 2011 Census, the unemployment rate in Downham was 7.5% among residents aged 16–74, compared to a Lewisham average of 6.3%. 31.5% of residents are not economically active, for example because they are in education, looking after home or family, long-term sick or disabled, or in retirement.

According to the 2011 census the average rate of Downham residents in very good/good health is 78% compared to a Lewisham average of 81% and a national average of 83%. Around 9.6% residents of Downham had a long term health problem or disability limiting their day to day activities a lot, compared to a Lewisham average of 7% and a national average of 8.3%.

¹ [Downham Ward Profile, Lewisham Observatory](#)

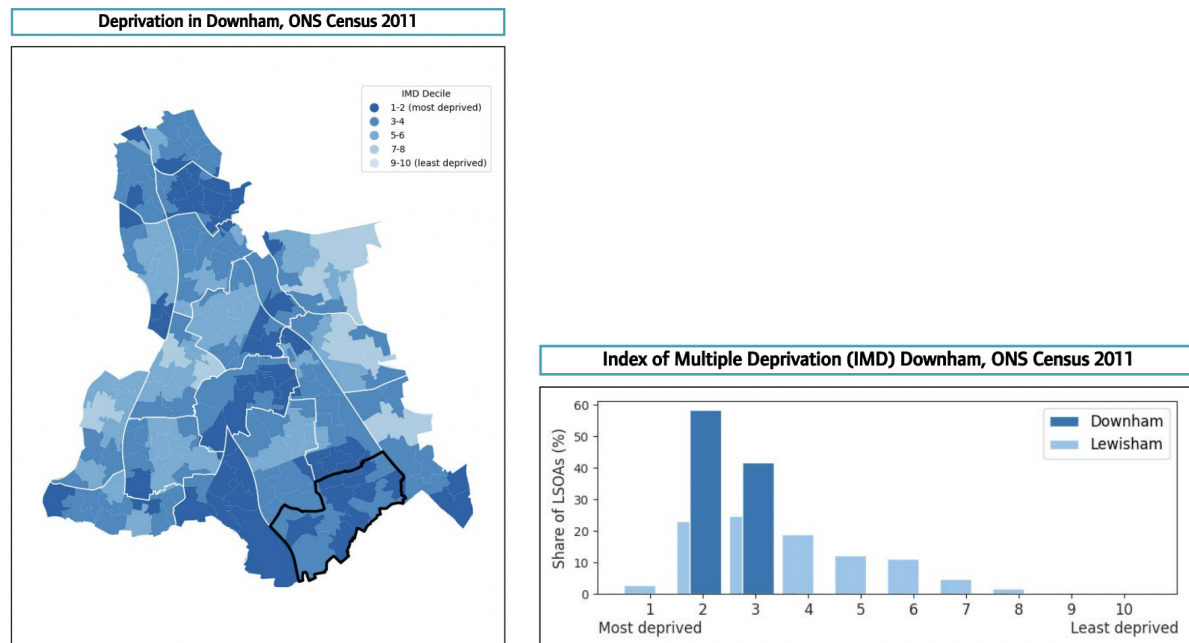


Figure 1: Deprivation in Downham, ONS Census 2011

According to the Joint Strategic Needs Assessment (JSNA)² 2019 Picture of Lewisham the main cause of death in Lewisham is cancer (27%), followed by circulatory diseases (25%), and respiratory diseases (17%). Lewisham also has high rates of excess weight in children and adults with 37% of Year 6 children and 58% of adults being considered overweight or obese.

In Lewisham almost a quarter of adults (18+) are classified as physically inactive (2016–17), with less than 1 in 5 Lewisham residents using outdoor space for exercise/health reasons (Natural England Survey, 2015/16).

There is also a significantly higher rate of serious mental illness in Lewisham (1.3%) compared to England (0.9%) (2017/18).

The recent Birmingham and Lewisham African Caribbean Health Inequalities Review (BLACHIR) report identified structural racism as a key issue that needed to be tackled in order to address health inequalities in the area..

² [Joint Strategic Needs Assessment \(JSNA\) Picture of Lewisham 2019 Part B](#)

According to the CLES report, Community Wealth Building in Lewisham³, the borough has one of the lowest job densities in London and attracts fewer large commercial employers than neighbouring areas. An estimated 21,000 individuals in Lewisham suffered from issues around personal debt (latest figures in 2017/18).

Opportunities

Downham has significant organisational and institutional assets with a track record of working together for the benefit of local residents.

Downham Dividend Society Community Land Trust and Sevenfields Primary Care Network (PCN) have a track record of working effectively together – and with the wider community and institutional stakeholders – on projects that support the improvement of the health and wellbeing of local residents. The local health strategy supports a community based approach to achieving health and wellbeing in Lewisham.

Sevenfields PCN has installed four outdoor gyms in local parks and green spaces and the two organisations have worked together with Social Life to undertake a community research project to work with Downham residents to identify local strengths and needs.

The area has extensive local green spaces and there is growing awareness of the value of open spaces in helping to deliver a wide range of social, economic and environmental objectives. Both planning and open space policies demonstrate a commitment to the protection and enhancement of local green spaces.

Nationally there is increasing awareness of the need to focus not only on spatial planning but on issues of land use, and in particular how public land owners can develop new models of ownership and management that can empower communities whilst helping them deliver on their wider objectives.

The Council is committed to community wealth building and a recent report by CLES found that there were opportunities to grow this approach by focussing on land and property and how this might be managed to be more socially productive.

³ <https://lewisham.gov.uk/mayorandcouncil/community-support/the-lewisham-deal>

Policy context

Community Wealth Building

Lewisham Council is committed to community wealth building. This commitment is longstanding and is expressed through the Lewisham Deal⁴; an agreement between local 'anchor institutions' to promote inclusive growth in the borough. The anchor institutions involved in the Lewisham Deal are: Lewisham Council, Goldsmiths, University of London, Lewisham and Greenwich NHS Trust, Lewisham College, Lewisham Homes, and Phoenix Community Housing.

Community wealth building is a people-centred approach to local economic development, which redirects wealth back into the local economy, and places control and benefits into the hands of local people. It involves local authorities working with key local institutions (anchor organisations) to deliver local strategies based on five key principles.

- Plural ownership of the economy
- Making financial power work for local places
- Fair employment and just labour markets
- Progressive procurement of goods and services
- Socially productive use of land and property

Based on these principles, the Lewisham Deal seeks to ensure local institutions build an economy that works for everyone in the borough. It is backed by an annual Social Impact Report which reports on outcomes with respect to Lewisham's key commitments of: apprenticeships, procurement, the London Living Wage, information and guidance, Black Asian and minority ethnic progression, and addressing the climate emergency.

In 2020 the Centre for Local Economic Strategies (CLES) undertook a diagnostic assessment⁵ to establish how Lewisham was currently delivering against the five strategic pillars of community wealth building: progressive procurement of goods and services; fair employment and labour practices; socially productive use of land and property; financing the economy; and plural ownership of the economy. Following their assessment they made a number of recommendations including:

⁴ <https://lewisham.gov.uk/mayorandcouncil/community-support/the-lewisham-deal>

⁵ [Community wealth building in Lewisham A CLES diagnostic report. 2020. CLES](#)

- Deepening the community wealth building approach by focussing on:
 - building a more socially, economically and environmentally just and resilient local economy, and
 - decarbonising Lewisham and responding to the climate emergency.
- Growing the community wealth building approach by:
 - focussing on land and property and how this might be managed to be more socially productive.

They identified that, as a significant land owner, Lewisham Council has the opportunity to use its land holdings in a socially virtuous way to build community wealth.

They also recommended that in order to facilitate a fundamental transfer in wealth and power to its local residents the Council should act to pluralise and democratise the ownership of the economy by supporting the development of more SMEs, and municipally owned companies and enterprises owned by workers, including co-operatives and mutually owned businesses.

Health and wellbeing

The Lewisham Health and Wellbeing Board has responsibility for the majority of health and care services in Lewisham. They bring together organisations across Lewisham to share expertise and local knowledge to deliver joined up and coordinated health and social care to all residents in the borough.

Their 2015 Health and Wellbeing Strategy, identified 'prevention and early intervention' as a key to addressing its priorities which include; achieving a healthy weight, and improving mental health and wellbeing. 'Communication and engagement with the public' was identified as an important approach to delivery of the strategy.

This was developed further in the 2018 refresh of the strategy which identified the need to "think differently about the root causes of health inequalities" and recognised that "health and wellbeing is affected by social and environmental factors as well by the choices and actions taken by individuals." It identified that achieving the objectives of preventing ill-health, maintaining good health, and keeping more people well and independent throughout their life course, would require a much greater focus on creating the conditions that make healthier lifestyle choices easier for individuals and families. A community-based approach was seen as critical.

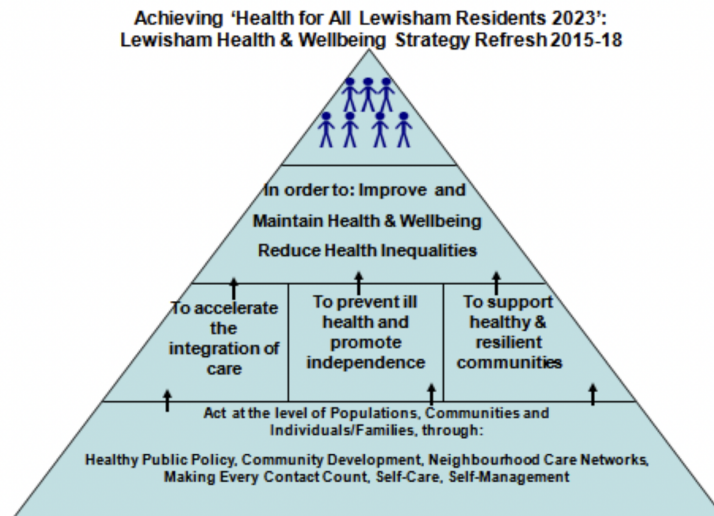


Figure 2: Achieving health and wellbeing in Lewisham

It also stated that, wherever possible, actions should operate on two or three priorities at the same time. These priorities included; preventing ill health and promoting independence, supporting healthy and resilient communities, and accelerating the integration of care.

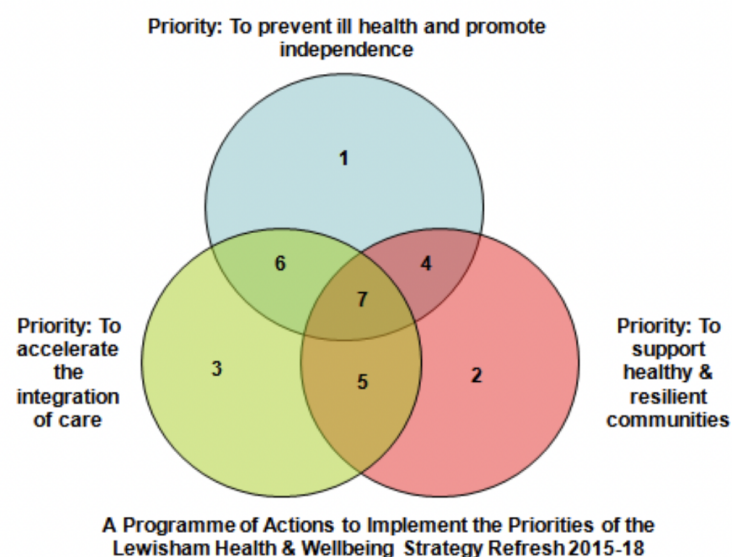


Figure 3: Lewisham health and wellbeing priorities

Integration of care was identified as “including building on the strong and active communities that already exist in Lewisham, to mobilise their efforts and support them to help each other to make changes in their daily lives, and empower them to take control over their health and wellbeing.”

The Birmingham and Lewisham African Caribbean Health Inequalities Review (BLACHIR)⁶ is a joint project between Lewisham Council and Birmingham City Council to understand and take action on long-standing health inequalities for people of Black African and Caribbean heritage. It found that the top three priorities of local residents were: structural racism and discrimination, mental health, and staying healthy as you age. Its 2022 report stated that; “poor housing, lack of green spaces, pollution, unemployment, food and fuel poverty, violence and crime and inadequate education all contribute to worse health and inequalities, and that these must be improved alongside action in health and social care services, otherwise the gaps will persist.”

Planning

Local Plan

Lewisham's Local Plan⁷ is currently being developed and aims to set out a shared vision for the future of the borough along with the planning and investment framework to deliver this vision through to 2040.

The currently available materials for the Local Plan shows that the overriding policy objective relating to public open green space is to ‘enhance and protect’ them.

There is very little in the Open Space Review and Draft Local Plan Policy – GR 2 (Open Space) – about how to use the land proactively and creatively to achieve desirable community wealth building and health and wellbeing outcomes, even though the plan documents acknowledge the capacity of public open space to achieve these.

The current process for completing the Local Plan process is as follows:

⁶ [The Birmingham and Lewisham African and Caribbean Health Inequalities Review, 2022](#)

⁷ [Lewisham Local Plan](#)

Completed

- January – April 2021: Consultation on the Main Issues and Preferred Approaches.
- September 2022: Council's consideration of revised draft Local Plan

Forward Programme

- Winter 2022: Publication of the Local Plan / consultation on the 'proposed submission document'
- Spring 2022/2023: Submission to the Secretary of State and Examination in Public
- Summer – Autumn 2023: Adoption by Council.

Neighbourhood Plans

There are a number of Neighbourhood Development Plans (NDPs) already in hand across Lewisham.

- Corbett Estate: is at an early stage and excludes Mountsfield Park immediately along the west side of the estate.
- Sydenham Hill Ridge: is at an early stage and contains a significant amount of public open space, including; Dulwich Wood, Sydenham Hill Wood, Sydenham Wells Park, Hillcrest Estate Woodland and a number of smaller spaces.
- Lee: has a published plan, with an emphasis on protection and enhancement / improvement, and extension of public open space.
- Crofton Park and Honor Oak Park: has a published plan, with an emphasis on protection and some extension of public open space.
- Grove Park: has an adopted plan, which emphasises the proactive relationship with its other objectives and policies for a sustainable healthy environment.

There are few overt references to health and wellbeing, community wealth building or climate change in published and adopted plans. There is a very strong 'protection' character to all the published or adopted plans, with some creative proposals for creating new spaces, better connections between spaces, new activities and enhancements relating to specific

spaces, and a clear relationship to health and wellbeing developments. Grove Park has the most rounded and integrated approach to the relationship between green space and health and wellbeing, both in optimising the uses of existing green space, and upping the quality of new development and non-green open spaces in which people spend much of their time.

Community Infrastructure Levy

A review of the Community Infrastructure Levy (CIL)⁸ was underway in 2018, but was then paused to be integrated into the new Local Plan programme. There is no publicly available information on what the new CIL will look like.

The Levelling Up & Regeneration Bill 2022 contains proposals for a new Infrastructure Levy that would also cover many but not all items now covered by Section 106 Agreements. The details of the new Levy, including what % if any will be available for use at community discretion, will be contained in new secondary legislation. Many think this will take some years to put into effect, with some local authorities needing transitional periods in which they move from the old to the new system. In the short term therefore, any health and wellbeing and community wealth building proposals will need to fall within the existing criteria for what CIL can be spent on. These include:

- State education facilities
- Public health care facilities
- Strategic transport enhancements
- Publicly accessible open space, allotments and biodiversity
- Strategic flood management infrastructure
- Publicly owned leisure facilities
- Local community facilities (including community centres and halls and libraries, but excluding places of worship)
- Public Emergency Services (this is intended to apply to physical projects by the police, fire or ambulance services)

Lewisham has pioneered allocating Neighbourhood CIL (NCIL)⁹, out of the main CIL receipt, on the basis of area deprivation indices. At the neighbourhood level, the Council has determined that communities may bid for funds for:

⁸ [Community Infrastructure Levy](#)

⁹ [Neighbourhood Infrastructure Levy](#), Lewisham Council

- Community facilities
- Parks and open spaces
- Transport improvements.

Planning Obligations Supplementary Planning Document (SPD)

The current Supplementary Planning Document (SPD)¹⁰ from 2015 is being reviewed as part of the Local Plan. Whilst obligations can arise in relation to: public realm, children's play space, environmental protection, and biodiversity, the council's priority requirements are "contributions for affordable housing and other mitigation measures that may be sought" e.g. flood and water management or offsetting carbon impacts of a development.

Parks and Open Spaces Strategy

Lewisham's Parks and Open Spaces Strategy 2020–2025¹¹ is a land use management plan for assets managed by the Council's Park's Team, and has informed the more recent Open Space Review 2022¹².

In the introduction to the strategy Councillor Sophie McGeevor (Cabinet Member for Environment and Transport) sets out the Council's ambitions, namely:

- To ensure that our green spaces are the heart and lungs for Lewisham, connecting active, healthy, and vibrant local communities'.
- That they create direct social value providing health and wellbeing for local residents by encouraging recreational opportunities and supporting active lifestyles.
- They improve the economic performance of the borough by supporting town centres, retaining employment, and attracting new businesses and skills; and by increasing the value of domestic and commercial properties.
- This will enable the whole community – residents, community organisations, voluntary and statutory agencies and businesses – to work in partnership to obtain

¹⁰ [Planning Obligations Supplementary Planning Document](#), Lewisham Council

¹¹ [Parks and Open Spaces Strategy 2020–2025](#), Lewisham Council

¹² [Lewisham Open Space Review, 2022](#), Lewisham Council

the maximum benefit from our open spaces.

- To involve both partners and the whole community in shaping the future of our open space.
- To provide sustainable management and community involvement of our open spaces to help to make Lewisham the best place to live, work and learn.

The strategy describes the Council's social, economic and environmental priorities and goals (pp 9–15) and delivery plan (pp 16–21) which are likely to be given priority in terms of time, programming and funding from any source (including Neighbourhood CIL), before considering new proposals.

These high level aspirations are broken down to each of five operational areas in the borough. Downham forms part of the Southern sub-area (see pp 52–54). The following extract of the Improvement Strategies recommended for existing and future projects indicate the relatively modest interventions currently envisaged for public open spaces in Downham:

- Parks of a 'fair' quality should be prioritised for improvement.
- To improve play provision for residents within the area of deficiency in access to Playspace, a 'pocket park' should be considered for inclusion within the area of deficiency.
- Improving walking and cycling access.
- Signage and other walking and cycling infrastructure are recommended for the spur of The Waterlink Way connecting The Waterlink Way to Beckenham Place Park.
- An additional bridge across the Catford Loop Railway Line between Beckenham Place Park and Summerhouse Fields should be considered.
- Access from the Areas of Deficiency in Access to Play in the east of the southern sub-area to the nearest play facilities at Durham Hill should be improved.

Assets



Photo credit: Timi Ajani drone footage

Green Spaces

Lewisham Council is a significant landowner with numerous registered land and asset holdings, including open spaces. The CLES community wealth building review found that between 2015 and 2017, Lewisham Council sold 5 spaces of public land and property assets, for a combined value of £1,999,480 but that there is now an appetite across the Council to ensure that these assets are harnessed in a socially virtuous way to build community wealth. However to date this has not been incorporated into the Council's community wealth building strategy and thinking.

According to the Lewisham Leisure and Open Space Study (2010)¹³ Downham has:

- 237.32 ha of all kinds of open space, 6.75% of the Borough total and the second highest after Grove Park Ward.
- 35 ha of green space, 10% of the Borough total.

¹³ [Lewisham Leisure and Open Space Study, 2010, Lewisham Council](#)

- 2.56 ha green space per 1000 population, making it the 3rd best served ward after Blackheath (5.13 ha) and Bellingham (6.6 ha) wards, with the majority of other wards having < 1 ha.
- 0.74 ha of allotment area, 3% of the Borough total and 0.05 ha per 1000 population.

These include:

Warren Avenue Park: situated in Bromley but owned by Lewisham, an under invested small park adjacent to Beckenham Place Park, but separated from it by a privately owned sports field.

Knights Academy School Playing Field: Used by Lewisham school and with potential to support a variety of uses such as football and horse riding school / provision of emotional support therapy with horses.

Shaftesbury Park / Downham Playing Fields: Potential linear open spaces leading down to Bromley road and into Beckenham Place Park, with good changing rooms but poor quality football pitches. The site is managed by One Life and gates are locked at dusk. It has potential to provide a safe bike route and sites for a Downham Decathlon.

Durham Hill: This underused and underinvested site behind the leisure centre offers panoramic views to rival any in London. It has potential for a wide range of uses including leisure and tourism.

Chinbrook Meadows: This park has a Green Flag Award and good facilities. Additional support and activities are required for local young people.

Green Chain Walk: This runs from the Lewisham border over the railway line and along Shaw road through Woodland Walk and alongside Nubia Way, New Woodlands School and White Foot Lane sports field. There is a community-led vision for integrated use of the woodland with the sports field to provide new activities and access to the sports field.

New Woodlands and White Foot Playing Fields: New Woodlands is the site of the first open air school in London and Nubia Way is the first social housing with grass roofs in London and Europe's largest black-led eco build. The sports field has a 15th century pond that needs restoration, and the changing rooms need redevelopment. The site is under utilised

and has great potential to host a wider range of activities and provide educational and recreational opportunities for local schools and residents.

Foster Memorial Park: Well resourced and well managed with an active Friends group.

Beckenham Place Park: In recent years the council has secured significant funding to regenerate the park. Whilst this has significantly improved the west side of the park and its amenities, and led to a 10 fold increase in visitors, there are concerns that the commercialisation of the amenities excludes many local residents. The redevelopment of the east (Downham) side of the park is currently underway and local residents fear that similar commercialisation will also exclude local people.

Mountsfield Park: This is Lewisham's central park which holds Lewisham's People's Day, south east London's longest-running free festival. Local feedback is that the play area is superbly used but needs renovation.

Grove Park Nature Reserve: A successful linear park close to Railway Children heritage site and currently subject to a master planning process to link a series of adjacent green spaces.

Drone footage of the area's green space assets can be seen here:

<https://vimeo.com/704578765/ca1b45a5f5>

Natural capital

According to the Vivid Economics Natural Capital account for London¹⁴ Lewisham is ranked as the 24th greenest out of the 33 London boroughs in terms of proportion of area under publicly accessible greenspace (514 Ha).

They calculated that Lewisham's green spaces provide a total value of £2.1 bn; including £215 million (£39 / person / year) in mental health savings and £371 million (£68 / person / year) in physical health savings¹⁵.

¹⁴ [Natural Capital Account for London, 2017, Greater London Authority](#)

¹⁵ [Natural Capital Account for London, Lewisham Borough Summary, 2017, Vivid Economics](#)

Total value

Total value: £2.1billion
Benefit-cost ratio: 25
Annual person value: £393

Assets	Public services	Household	Business	Value	%
Recreation		444		444	20
Mental health	43	110	62	215	10
Physical health	74	189	107	371	17
Property		1188		1188	53
Carbon				1	<1
Temperature		20		20	1
Value	117	1951	170	2238	100
%	5	87	8		

Note: All values are expressed in million £s.

Figure 4: Natural capital value for Lewisham

Health

Mental health savings
Total value: £215 million
Annual person savings: £39
Physical health savings
Total value: £371 million
Annual person savings: £68

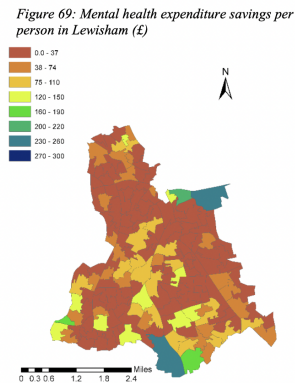
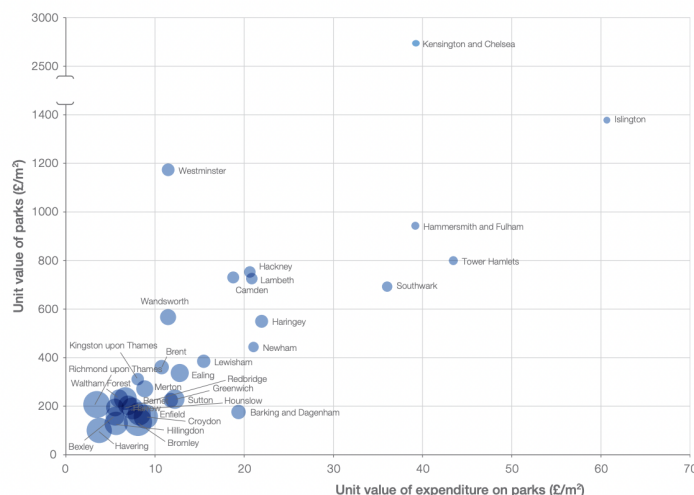


Figure 5: Natural capital mental and physical health savings for Lewisham

They also note that the value of parks per m² was positively correlated with how much the local authority spent on their parks per m² i.e. the greater the amount spent on parks and green spaces the greater the natural capital benefits¹⁶.

¹⁶ [Natural capital accounts for public green space in London, 2017, Vivid Economics](#)

Value and expenditure on parks are positively related across London's boroughs



Note: The City of London is excluded from this figure. This is due to expenditure data for the City of London including the amount spent on parks that are owned outside of the boundary of the local authority. Bubble size is proportional to the area of parks in a borough.
Source: Vivid Economics

Figure 6: Natural capital value vs expenditure in London

Institutions

The key landowners within the area are the Council and Phoenix Community Housing.

Both have core interests in supporting the health and wellbeing of residents, ensuring the creation of good jobs and training opportunities in a thriving local economy, and meeting net zero climate objectives, and in ensuring that the area's green spaces are able to support the delivery of these objectives. They also have significant staffing, organisational and financial resources to support the delivery of these objectives.

People and Networks

The people and diverse communities of Downham are its most valuable asset. Every individual has valuable experience, skills and connections to contribute to the well being of themselves, their family and the wider Downham community.

People and their community links are the social capital of Downham. In order to tackle intergenerational poverty we need to develop initiatives which alter people's self-perceptions from merely recipients of aid to active participants in the regeneration of their neighbourhood.

If people are assets then we need to move from consultation to supporting resident participation in the decision about the regeneration of their neighbourhood.

The social capital also includes the network of community organisations (many women-led), schools and businesses that are rooted in, and committed to, the well-being of Downham.

What others have done

Case Study 1: Parks for Health

In 2019, The London Boroughs of Camden and Islington were jointly awarded a two-year grant of £667,000 as part of the national Future Parks Accelerator (FPA) initiative, to make their parks and green spaces focal points for improving people's health and reducing health inequalities.

The project aimed to maximise the contribution of parks to prevention of ill health, early intervention and promotion of wellbeing, by prioritising five health impacts; improved social cohesion, reduced isolation, improved physical health, better mental health and wellbeing and reduced health inequalities.

Key objectives included; increasing and diversifying the use of parks by different groups, strengthening the case for investment in parks for community health and wellbeing benefit, and maximising local partnership—working between parks, NHS, social care, the VCSE sector and others to improve health and reduce health inequalities.

The councils have worked closely with Friends and Parks User Groups, voluntary and community sector organisations and GP practices, as well as other strategic partners including clinical commissioners and health and care providers, to understand the needs of residents and to create new opportunities for communities to use their local green spaces as places to improve their health and wellbeing and reduce health inequalities.



Figure 7: Community produced Parks for Health guides

The Parks for Health Strategy¹⁷ developed through this process has six main themes; investment, workforce development, working with the VCSE sector, working with health and social care partners, working with residents, and widening strategic partnerships.

Investment

So far they have successfully used their Strategic Business Case to protect budgets, secure an additional £120,000 per year for maintenance and improvements in Camden parks, securing £200,000 per year (ring fenced Public Health finance) for the Ranger Service and an additional £150,000 per year from Housing for a new community gardening team. The Parks for Health vision also informed successful funding bids including £200,000 Future Neighbourhoods 2030 funding (Somers Town) and £40,000 Grow Back Greener funding (Swiss Cottage).

In the future they are aiming to use the Healthy Parks framework to embed health outcomes in their Green Space Investment Plans, and to support the growth of partner-led funding of activities in parks, including co-ordination of bids by multiple community stakeholders.

Workforce development

To date they have conducted a service review in Camden to inform a new delivery model from April 2023, including embedding health promotion in the Green Space Partnership Officer role, whilst the Islington parks service has redesigned roles to achieve Parks for Health objectives. This includes becoming more outward-facing, strengthening relationships with other council departments, such as Estates and Highways, and working alongside

¹⁷ [Parks For Health Strategy 2022-2030, Camden and Islington](#)

voluntary and community sector organisations as equal partners, using mutual learning and coproduction approaches and encouraging and supporting more diverse use of parks.

In the future they are looking to transform the working culture so that joint working with council colleagues and local partners is the norm whether in policy, strategy or frontline services; and that co-production, collaboration and mutual learning with VCSE partners are standard practice.

Working with the VCSE sector

Work to date has included mapping health activities in green spaces and working with VCSE organisations to inform investment priorities to meet the needs of specific communities. The work has involved developing new relationships with organisations interested in expanding their work into parks settings providing training and support such as the Healthy Parks Creator initiative delivered by Shared Assets, which brought VCSE organisations and the parks workforce together to co-create resources for mutual learning.

Future work will include continued partnership working with local VCSE organisations to increase, diversify and improve the programme of health related activities in their parks, and connecting horticultural volunteering and apprenticeship roles in areas around parks.

Working with health and social care partners

To date they have developed new strategic relationships with the Integrated Care Partnership and Clinical Commissioning Groups, Primary Care Networks, Social Prescribing Link Workers, and GP practice. They have ensured green spaces are embedded in partner strategies and plans, collaborated on the development of parks-based green social prescribing, and secured joint national funding for Prevention and Promotion for Better Mental Health via targeted health and wellbeing activities in parks.

Over time they aim to develop high quality, accessible health and social care services – delivered in partnership with parks services. These will support independent living, and prevention and recovery, with health and social care partners utilising parks and green spaces year-round for activities which improve health, connect people and communities and help reduce health inequalities. They will support and encourage health and social care commissioners to integrate a parks and green spaces offer into mainstream services and

programmes, and commission and resource roles and programmes for prevention, self-management of health and care, and supporting independence.

Working with residents and strategic partners

They have developed a communications strategy to improve engagement with residents and disseminate targeted content to key audiences who do not currently use local parks, including women and girls, and people from ethnic minority backgrounds.

They have also worked with internal and external partners to ensure that Parks for Health principles are incorporated into other programmes including Camden's £1 billion Community Investment Programme, children's services in Islington, and Islington's Community Gardening and Food Growing Review. They have also begun discussions with potential funders in different sectors, including Islington Giving, to develop new funding sources for the work.

They intend to continue to work strategically with Planning teams to influence major developments and leverage developer investment for Parks For Health facilities. Housing teams will embed Parks for Health principles into housing design requirements, and climate change and biodiversity teams will help increase community resilience and wellbeing through environmental measures.

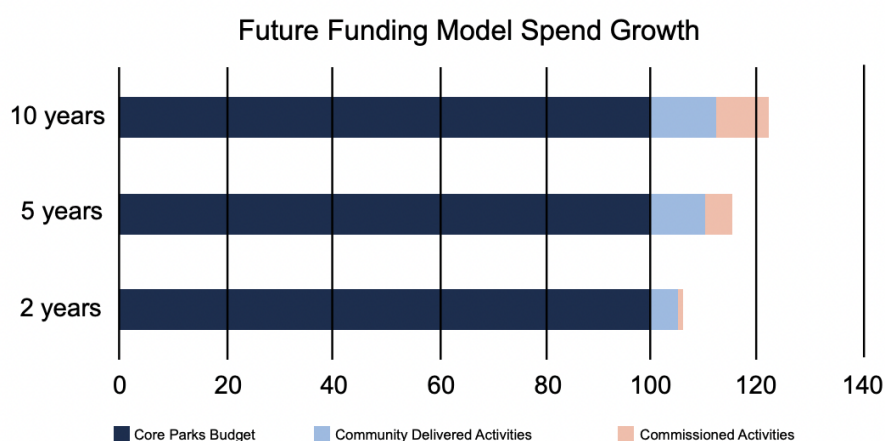


Figure 8: Future funding model for Camden and Islington parks

Case Study 2: Parks Foundations

Parks Foundations have arisen over recent years as a model to enhance the management of public parks by providing a collaborative platform dedicated to fundraising for capital improvement and enhancement for public parks and greenspaces to sit alongside existing local authority parks and greenspaces departments.

They are charitable organisations that are set up to work with existing parks stakeholders to generate income, provide volunteer opportunities, support community activities and promote the use of parks for health and wellbeing. They do not take ownership or the overall management responsibility of parks and greenspaces.

Parks Foundations are not Parks Trusts which typically own or manage parks and their associated assets (see below).

Examples of existing Parks Foundations in the UK include:

The Parks Foundation: established by Bournemouth Council in 2015 (as Bournemouth Parks Foundation) with the aim of raising funds and awareness for 160 public parks and greenspaces. The Foundation was established as a charitable company to work alongside the council to raise the capital improvement funds to enhance the facilities and equipment in parks and greenspaces for the benefit of the community, over and above what the council provides. The Foundation employs 10 members of staff to deliver all management functions, including finance, marketing, fundraising, volunteer management, trading activities and project management. It is governed by a board of seven Trustees and works closely with the Council to identify key funding challenges and projects which they can support. Two Council officers sit on the board of trustees. A Memorandum of Understanding defines the partnership between the local authority and the Foundation.

Since it was established in 2015, the annual income generated by The Parks Foundation has grown from £20,000 to £889,914 in 2020–21. Its total expenditure in 2020–21 was £496,162. It runs two community cafes which generated a revenue of £72,322 and surplus of £10,697 in 2020–21. It runs wellbeing activities, has installed play equipment in parks across the area, undertakes planting to improve wildlife and biodiversity, and delivers an events programme to engage, educate and inspire local communities.

In 2021 it rebranded as The Parks Foundation and widened its geographical area of operation to include Christchurch and Poole, reflecting a recent local authority reorganisation.

Income and expenditure

Data for financial year ending 31 March 2022

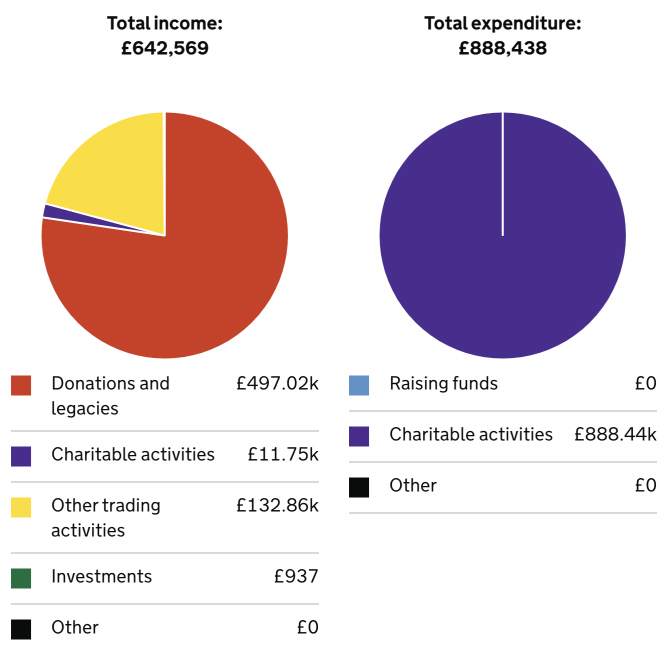


Figure 9: The Parks Foundation income and expenditure 2021-22

Bristol and Bath Parks Foundation: established as a Charitable Incorporated Organisation (CIO) in 2019 with the aim of supporting activities to take place in parks, enhancing biodiversity, raising additional income for parks and supporting volunteers. The Foundation has two paid staff and a volunteer coordinator for each city, funded by the local councils, who also pay for office space. It has recruited a skills-based board of trustees.

In 2020 its gross income was £129,560 with an expenditure of £88,940 and in 2021 its gross income was £167,778 (including £90,000 in grant income) with an expenditure of £172,497. It has used surpluses to fund local community groups to take action to improve their local parks, and to pay for new planting of wildflowers, trees and hedging.

Salford Parks Foundation (modelling)

In 2021 Shared Assets was commissioned by Greater Manchester Combined Authority to develop an options appraisal and financial model for a Parks Foundation for the city of Salford (population 254,000, and the 18th most deprived local authority area in England).

There is a range of legal vehicles available for a Parks Foundation to operate through¹⁸, but the options most appropriate for establishing a new legal vehicle for a Parks Foundation are: a Company with Charitable Status, a Charitable Incorporated Organisation (CIO), or Charitable Registered Society / Community Benefit Society. These legal forms are most likely to; provide access to a wide marketplace of funders (private, public and charitable, ensure its assets and profits are used for improving parks (and not used for private benefit), enable it to develop its own commercial income e.g. from sale of services or use of assets.

Whilst a Parks Foundation could undertake a wide range of functions the most fundamental ones identified were:

- A 'core' function providing leadership and undertaking coordination, business development, administrative and communications roles.
- A 'resourcing' function focused on traditional fundraising and potentially developing new social investment models.
- An 'animating' function focussed on creating new opportunities for the use of parks and parks assets, and potentially building the capacity of existing parks user groups.

In the case of Salford, financial modelling showed that if Core, Resourcing and Animating functions were developed the two largest potential sources of income for the Foundation are predicted to come from grants (31% over five years) and assets (38% over five years), providing an overall surplus over five years of £271,000. For this to be successful assets, including car parks and a small portfolio of parks buildings, would need to be secured on favourable terms and managed entrepreneurially to both generate income and create new facilities that enhance the amenity value of local parks.

¹⁸ [Simply Legal](#) pp 34

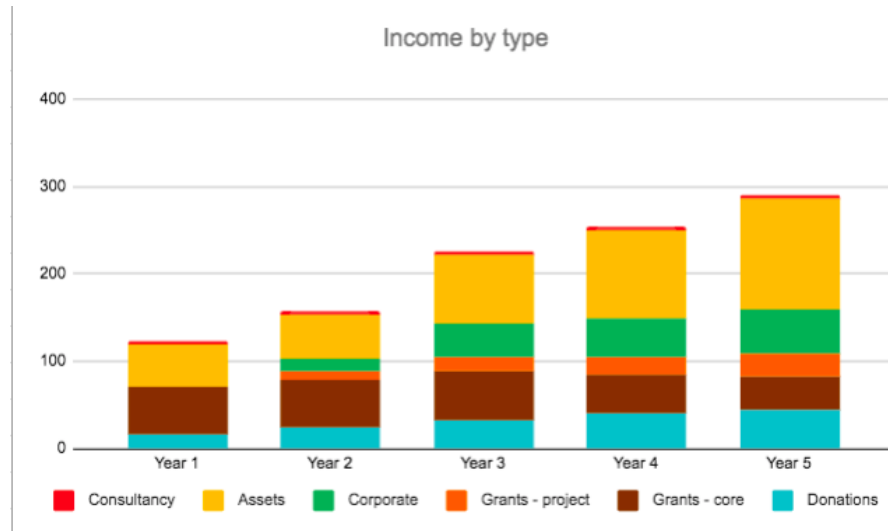


Figure 10: Projected 5 year income model for Salford Parks Foundation

Case Study 3: Parks Trusts

Parks Trusts which typically own the freehold (or have a very long leasehold) on parks and their associated assets which they manage for public benefit. This approach is often financed through an endowment, of cash or assets, to provide long-term funding for public parks and greenspace provisions, or through a long term grant or contract from the local authority which guarantees a base level of income.

They are typically charitable companies, often with trading subsidiaries which carry out more commercial activities (e.g. running commercial assets to generate a surplus) which then return profits to the charitable parent organisation.

Parks Trusts are a considerable change from the traditional models of public parks and greenspace management which can pose a challenge. They require the establishment of a charitable trust as well as the transfer of the leasehold or ownership of LA-owned public parks and greenspace, alongside a significant endowment. The endowment needs to be large enough for the return on investment to cover the ongoing management and maintenance costs of the assets the Trust is responsible for.

Parks Trusts generally own and manage a portfolio of assets. Examples include:

Milton Keynes Parks Trust:¹⁹ The Milton Keynes Parks Trust is one of the longest established Parks Trust in the UK and has financed the management and maintenance of Milton Keynes parks and greenspaces successfully for nearly 30 years. Its success is built on a legacy of support from the city founders and its unique financial position through the provision of a substantial endowment at the point of set up of £20m. As an independent charity, managed separately from the local authority, it manages all of Milton Keynes' public parks and greenspaces. It both delivers and curates a wide range of physical activities²⁰ with spaces also hosting social, cultural and educational events and activities to cater for a wide range of interests, cultures, ages, and tastes.

Since its initial endowment funding of £20m in 1992, the Parks Trust has developed an extensive investment portfolio of assets which are used to finance ongoing greenspace management. Their investment portfolio is split across commercial property, financial investment, operational income and farming income. The investment portfolio totals £143.6million, including £102.9 million directly invested commercial property and £40.7m in managed funds. The Parks Trusts commercial property portfolio is spread between retail, office, hotel and leisure, industrial and residential and managed by an in-house team. The managed fund portfolio totals £40.7m (2018: £40.0m) and is invested in a mix of stock market and other financial investments.

Income streams	2018	2019
Commercial property portfolio	£6.768m	£7.575m
Financial investments	£1.029m	£1.050m
Operational income	£395k	£494k
Farming income	£520k	£448k

Figure 11: Income streams for Milton Keynes Parks Trust

Urban Green Newcastle, Newcastle Parks and Allotment Trust: In 2017 Newcastle Council proposed that an independent charitable trust be set up to take on the management and funding of all the city's parks and allotments. Specifically, the council Cabinet agreed to set up a new charitable trust, to which it transferred the council's parks' and allotments' estate. Whilst the assets will remain under council ownership they were transferred under a 125 year lease. In April 2019, 33 of Newcastle's parks and 64 allotment sites and the staff that care for them were transferred to Newcastle Parks and Allotments Trust along with a 10-year funding package from the council. The transfer included approximately 409 hectares of

¹⁹ [Milton Keynes Parks Trust](#)

²⁰ <https://www.theparkstrust.com/activities/>

parks/greenspaces, 15.5% of the city's open spaces, including its principal parks, countryside parks, neighbourhood parks, playgrounds and allotments.

Whilst the council has invested significant resources to deliver the transfer, Heritage Lottery Fund provided significant start-up funding of £237,500 to support the transformation process through its Resilient Heritage Grant programme. National Trust supported the council to establish a charitable company with a trading subsidiary company. All profits generated by the trading subsidiary will be donated to the Trust. The structure also includes a separate Trust to hold any endowment with all income generated applied for the benefit of the Trust.

The council has pledged a revenue contribution to the Trust of £9.5m to support its first 10 years of operation to financial independence. The council chose to invest in the Trust as it is estimated that the Parks and Allotment Trust will deliver a long-term saving of over £110m for the council (after the initial 10-year period).

The finances for 2020–21 (see below) show that the organisation had an income of £2,744,255 and an expenditure of £2,320,642. Income included £1.7M revenue contribution from the council and £100,000 in grant income.²¹

The objects of the Trust include the advancement of health by promoting participation in sport and other outdoor recreation, providing recreation and leisure facilities, including allotments, and advancing education in the conservation, protection and improvement of the natural environment and the history, culture, heritage and traditions of the area. They support health wellbeing through the provision of allotments, supporting volunteering and collaborating with Newcastle City Council on the design, coordination and delivery of sport and physical activity programmes in parks.²²

²¹ [Charity Commission website](#)

²² [Urban Green Newcastle, 2021, Annual Report](#)

Income and expenditure

Data for financial year ending 31 March 2021

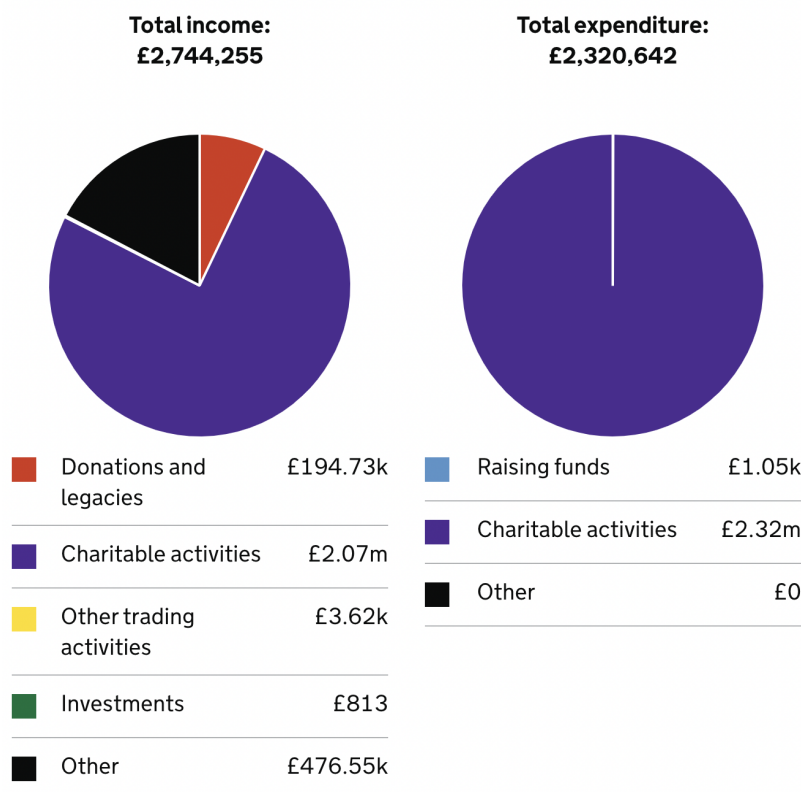


Figure 12: Urban Green Newcastle income and expenditure 2020-12

Smaller scale trusts: Park Trusts have also enabled local authorities to pass responsibility for the leasehold or freehold and management of single sites to local charitable organisations.

Potters Fields Park Management Trust²³: Potters Fields on the south bank of the Thames was redeveloped by Pool of London Partnership, More London and Southwark Council and management of the park transferred from Southwark Council to the Potter's Fields Park Management Trust on a 25-year lease. Potters Fields Park Management Trust is a not-for-profit organisation that manages and maintains Potters Fields Park and St. John's Churchyard. The board comprises representatives of the local organisations: Fair Community Housing Services, The Greater London Authority, More London Development

²³ <https://pottersfields.co.uk/>

Limited, Shad Thames Residents Association, Southwark Council, and Team London Bridge. The Trust offers a range of events as well as education in horticulture, arboriculture and wildlife to local and wider communities.

Jubilee Gardens Trust²⁴: The Trust was established to take on the leasehold ownership and management of land previously owned by the Southbank Centre in London. It has four classes of members Resident Members, Local Enterprise Members, Landowner Members and Associate Members, each of whom can appoint Trustees from their membership. The Board can also appoint additional Trustees for their specific expertise. The Trust is funded through subscriptions of landowner members, an annual payment from the Southbank Centre agreed through the lease, plus other donations, S106 contributions and concession and events income. Despite this there remain concerns that an additional annual income of £145,000 or a £3M endowment will be required to prevent future deficits arising.

Case study 4: Management organisations

In some cases rather than taking on a lease or freehold of a site (or number of sites), charitable or community benefit organisations are providing management services through contracts or partnership working arrangements.

Myatt's Fields Park Project²⁵: is a charity that has over time taken on increasing responsibility for the management of a park owned and managed by Lambeth Council. The charity was founded in 2002 and is adding value to the work done by the Council in management, usage and development of the Park. The Council continues to deliver basic maintenance functions. The charity manages park hires including the football pitch, pre-school, nature area, tennis courts, and a café. It also provides a range of activities and events including volunteering, food growing, horticultural volunteering, community dining and a weekly market. The organisation is governed by a board of Trustees with 3 subgroups responsible for; community engagement, fundraising & projects, and finance. It had a total income in 2020 of £230,000.

Bankside Open Spaces Trust²⁶: is a charity that manages a range of publicly and privately opened green spaces within London's SE1 district through a mixture of leases and management agreements. These include the Tate Modern Community Garden owned by the

²⁴ <https://jubileegardens.org.uk/>

²⁵ <https://www.myattsfieldspark.info/>

²⁶ <https://www.bost.org.uk/>

gallery and Winchester Palace Garden in the ruins of the Place of the Bishops of Winchester. On sites they lease they are able to generate income from the hire of sites and facilities.

Chiltern Rangers²⁷: is a Community Interest Company that was spun out of Wycombe District Council in 2012. It manages a portfolio of 14 woodland sites owned by the Council. The Council agreed an annual fee which declines over the first 10 years as the organisation develops alternative income streams. The woodlands are managed according to a management plan agreed between the organisation and the Council.

Emerging models

In addition to these established ways of working there is increasing interest in the development of more innovative, cooperative or commons-based, approaches to collaborative working between local authorities, community organisations and other public and private stakeholders.

Public commons partnerships

Public Commons Partnership (PCPs) are new proposal from the think tank Common Wealth²⁸ to enable councils and other public bodies to work with communities to design, manage, and expand urban infrastructure and landscapes. They propose that PCPs can provide a radically democratic institutional model that enables councils and other public bodies to work with communities to design, manage, and expand the commons²⁹.

Wards Corner Market, Haringey: is home to the Latin Village indoor market, one of the last remaining hubs for the Latin American diaspora in London. Both the building and the land it sits on has been owned by Transport for London (TfL) since 1973. In 2007, a development agreement was signed between Haringey Council and a developer, followed by the granting of planning permission for the developer's proposed redevelopment in 2012. These plans were opposed from the outset by many of the market traders, local businesses and community groups and an alternative 'community plan' for the site was developed.

²⁷ <https://chilternrangers.co.uk/>

²⁸ <https://www.common-wealth.co.uk/>

²⁹ [Public-Common Partnerships: Democratising ownership and urban development. 2021. Common Wealth](#)

A public commons partnership is proposed to establish the Wards Corner building as a community controlled asset that will function as the motor of a wider democratic revitalisation of the surrounding area. It is proposed that in order to take forward the community plan for the site TfL retain the freehold of the land and building and a new community benefit society (CBS) is established that takes the leasehold on the asset. A CBS is a cooperative legal structure that ensures democratic decision making between different stakeholders and where all profits must demonstrably be used for community benefit. The CBS membership will be made up of; TfL, the local Development Trust (a charity), the Market Tenants Association, investors, and community members (from within a defined geography).

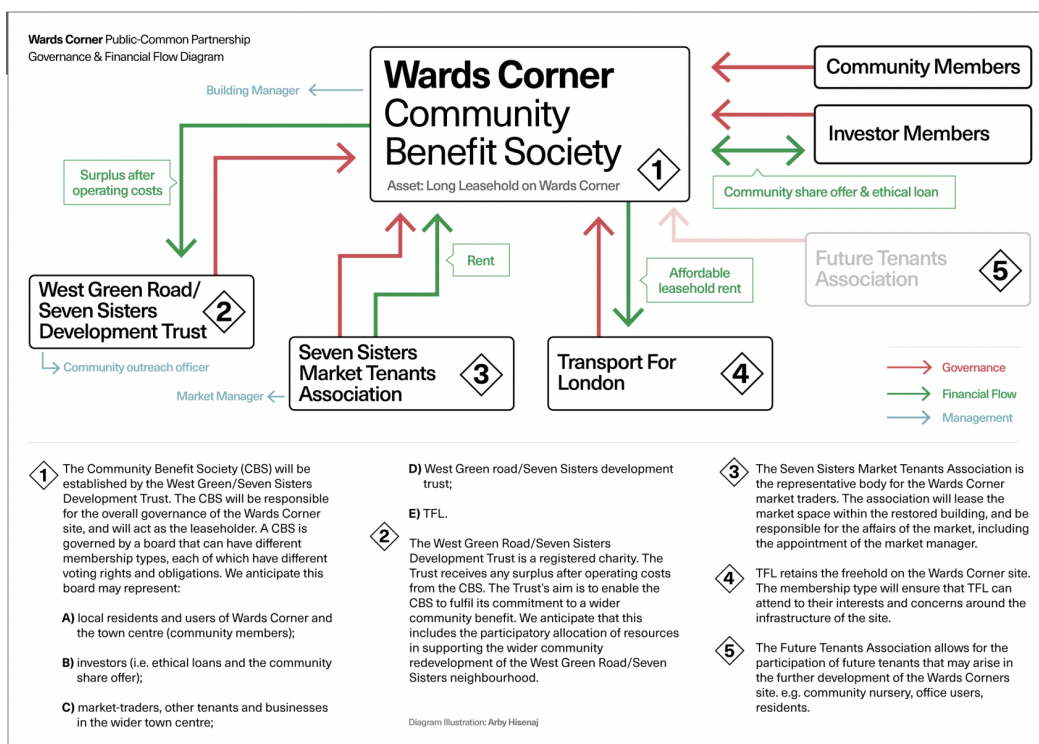


Figure 13: Public commons partnership model for Wards Corner

Redevelopment of the building is expected to cost £11.7 million. A CBS is able to issue community shares to raise capital and a community share offer is expected to raise between £750,000 and £1m. With grant funding expected to provide between 25–50% of the total cost, the remaining cost, between £4.8–8m, is to be raised through debt financed from pension funds and ethical banks. The public partner in the CBS, TfL, is able to act as guarantor on these loans, facilitating access to otherwise unobtainable debt financing. Whilst financial modelling suggests that it will take anywhere between 17–28 years to repay

the costs of redevelopment, this is inclusive of an internal rate of return that would generate a utilisable community fund from the third year onwards. All profits generated by the CBS will be transferred to the Development Trust to support its broader community and economic development aims.

Ecosystems services cooperatives

Ecosystem service cooperatives are a new proposal from the think tank Promoting Economic Pluralism³⁰. It is a model which aims to bring together multiple funding streams from different institutions with an interest in shared outcomes (stacking) in order to fund and coordinate a combination of different activities delivered by partners on the ground (bundling).

The model was developed in a more rural context to enable investors and land managers to work together to deliver ecosystem improvements. It may be possible to adapt the model to a more urban context.

Like the Public Commons Partnerships (above) a cooperative legal structure provides a democratic framework that enables a range of different stakeholders to work together to deliver shared objectives. Membership is split into:

- 'beneficiary members' who provide investment, and
- 'provider members' who deliver the work

In the case of an urban parks and wellbeing cooperative:

- the beneficiary members might include the council, NHS and housing association, who both own land, control significant budgets and have desired outcomes with respect to improvements in health, wellbeing, community wealth building and environmental outcomes, and
- the provider members might include local community organisations, the Primary Care Network, environmental organisations, sports clubs, social enterprises etc who are delivering services within the parks and open spaces which can help to meet those outcomes.

³⁰ <https://economicpluralism.org/>

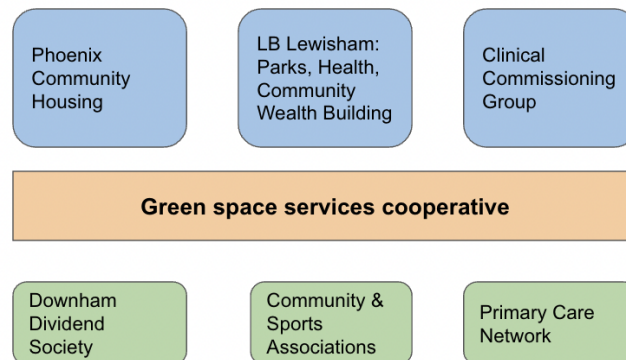


Figure 14: Potential green space services cooperative model
(adapted from Economic Pluralism's ecosystem service cooperative model)

Within the proposed model members agree:

- Types and levels of investment
- Activities for delivering multiple benefits
- Payment rates to provider members for standard activities
- Approaches to measuring and monitoring impact
- Distribution of any surpluses from provision of services to non-members

Funding Opportunities

Over recent years, as public funding for parks and open spaces has been squeezed, local authorities, parks foundations, parks trusts and other organisations responsible for managing and animating public spaces have diversified the range of income streams they are using to contribute to meeting their capital and revenue costs.

Grants from Trusts and Foundations

There is a strong marketplace of funders that can yield regular income for parks based projects, and health and wellbeing initiatives. These include National Lottery Heritage Fund,

National Lottery Community Fund, Esmee Fairbairn Foundation, Sports England and local Trusts and Foundations.

Many will only accept applications from charitable or not-for-profit organisations and are therefore not accessible by local authorities, public bodies or private companies.

We have split grant funding into 'Core' and 'Project' funding. Given many funders' current focus on environmental issues, wellbeing and addressing inequalities (including in health, education and access to green space) such activities are likely to be highly fundable, particularly for new initiatives building on existing relationships and skills.

Core funding: is typically for a total value of over £100,000–£200,000 spread over three to five years and to cover costs of core staff and overheads. Providers of core funding include the National Lottery Community Fund, Esmee Fairbairn Foundation, John Ellerman Foundation and Henry Smith Charity.

Project funding: is more likely to be shorter term (from several months to three years), for lower values (tens of thousands of pounds), and to deliver specific activities and outputs. Typical funders include the National Lottery Heritage Fund, Awards for All, Tudor Trust, the Coop Foundation, local trusts and foundations, and funders with a specific geographic, issue or demographic focus such as supporting activities for young people or asylum seekers and refugees.

A list of current relevant grant funders is provided in Appendix 1.

Assets

The transfer of income generated from fees and charges, and of the freehold or leasehold of underused parks buildings and facilities, from the council to any new vehicle seeking to add value to local parks and green spaces is one way that councils can support its establishment and long term sustainability, whilst benefiting from the additional capacity and entrepreneurialism it can bring to their management.

In the case of the Salford Parks Foundation model described above, income from assets had the potential to account for 30–40% of total income in the first five years of operation. This is a similar proportion to the income projected from grants (see above) making these the two largest contributors to income. This included:

Car parking: Car parking spaces, provided they have charging infrastructure installed, can provide a regular income with limited workload. In the case of the Salford Parks Foundation model we assumed that 90 car parking spaces at 50% occupancy for a fee of £2 and a 5% growth rate would provide an annual income of £32,850 in year 1 rising to nearly £40,000 in year 5.

Concessions: These include leasing sites for e.g. ice cream, snack or coffee vans. Whilst dependent on affordability, and sitting in areas where there is good footfall, the transfer of existing concessions income – or issuing of new licences – can provide a valuable guaranteed income. In the case of the Salford Parks Foundation model we assumed that concession income of £8,000 in year 1 rising to £16,800 in year 5.

Building and sports pitch hire: The transfer of underused parks buildings and sports pitches, either freehold or leasehold, has the potential to provide a commercial income whilst bringing new life to underused assets and increasing the animation of the surrounding parks by providing new facilities for parks users.

In the case of Salford Parks Foundation we assumed that each building was leased to third party businesses or social enterprises on commercial rates (rather than to e.g. a small social or sports group) and was able to generate a rental income of £5,000 per year based on an average lettable space of 200 m² and a commercial rent of £25 / m². A similar income could be achieved by for instance hiring out 1 training, meeting or therapy room at £10 / hour assuming 15 hours bookings a week for 35 weeks a year.

In developing a business model for Copthall Park in Barnet we calculated that annual income from grass football pitches and Multi Use Games Areas could be in the region of £10,000 per pitch / year and from tennis courts of £5,000 per pitch / year.

With car parking, buildings and sports facilities, infrastructure capital costs would need to be raised to bring the buildings up to commercial standards in order to achieve these income projections and annual costs of maintenance would be incurred. These capital costs might be subject to specific fundraising from trusts and foundations or potentially met by the Council as a loan or as part of a negotiated endowment to support the development of any new vehicle for improving the use and value of the area's open spaces. It should be noted that in order to secure grant funding for capital costs any new organisation would need to be able to demonstrate that it has a long term interest in the site e.g. through a lease of 25 years or longer.

Events: The use of parks for commercial events has the potential to generate income and increase engagement in local parks. Whilst community events might be hosted for no charge or a small administrative fee, small events (e.g. up to 100 people) might raise an income of £1,500 and medium sized events (up to 5,000) might raise an income of £5,000. In all cases our assumption is that any organisation would be licensing others to use the sites rather than delivering events itself.

Renewable energy generation

There is increasing interest in the potential for parks and open spaces to deliver renewable heat through the installation of ground source heat pumps. In England and Wales there is a target in place for 15–18% of heat to be generated from networks of this kind by 2050, and the Committee on Climate Change estimates that 19 million heat pumps will be required to meet our net zero targets³¹. Recent examples of installations include:

- Enfield³² (supplying 400 flats over 8 x 12 storey tower blocks)
- Croydon³³ (supplying 44 flats in a single block)
- Hackney (supplying a community space and cafe in the park)

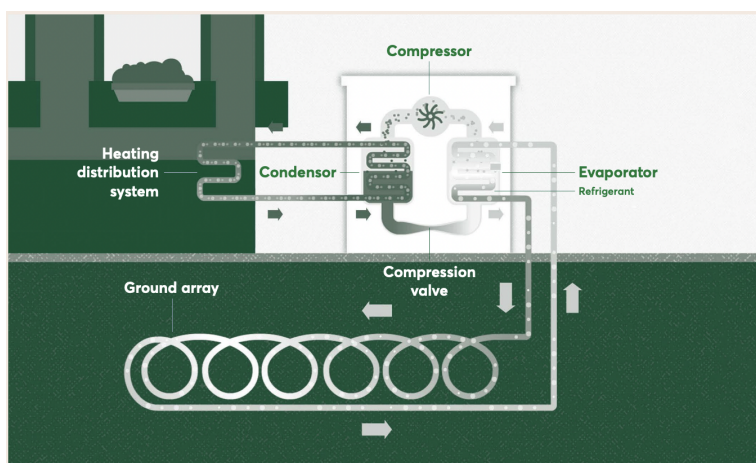


Figure 14: How does a heat pump work? From: Harnessing renewable energy in parks, Nesta³⁴

³¹ [Net Zero Technical report, 2019, Committee on Climate Change](#)

³² <https://www.kensacontracting.com/case-studies-enfield/>

³³

<https://www.kensacontracting.com/croydon-council-responds-to-climate-emergency-with-kensa-contracting-gshp-pilot-scheme/>

³⁴ [Harnessing renewable energy in parks, 2020, Nesta](#)

Nesta's Powering Parks³⁵ research brought together data from Ordnance Survey, the British Geological Society, the European Environment Agency, industry standards and academic papers to generate estimates of the total ground source heat potential in the parks of England, Scotland and Wales. They found that heat pumps could be one of the most effective and low cost technological solutions for decarbonising heat in urban areas.

They also broke these estimates down to the level of individual local authorities so that they could see which cities, districts and boroughs have the greatest untapped potential. Lewisham ranked 42nd (of 333 local authorities) with 193 Ha of suitable green space (including amenity land, playing fields, public parks and tennis courts) capable of generating 43 MW (equivalent to a CO² saving of over 12,000 tCO²e/yr). This places Lewisham in the top 15% of local authorities with the potential to develop significant ground source heat.

Whilst the energy market, supply and construction costs are all changing rapidly, the IGNITION project led by Greater Manchester Combined Authority states that renewable energy in parks, such as heat pumps, has the potential to generate a long-term income stream to sustain ongoing investment in other areas of greenspace management³⁶.

Corporate Income

Corporate giving is seen by businesses as a way of giving back to their communities whilst building their brand and reputation, with giving to support parks and green spaces being seen as a way of improving the attractiveness of a local area and enhancing employee wellbeing.

Team days: As well as providing additional volunteer labour to undertake planting and maintenance tasks, providing structured team day experiences for businesses can provide an additional income stream. Commercial team day providers such as Blue Hat and White Rhino charge between £1,200–£3,200 for a team of 20 people.

Sponsorship: Sponsorship of facilities, structures, flowerbeds, planting schemes etc can also provide income generation opportunities.

³⁵ [Powering Parks. 2019. Nesta](#)

³⁶ [Case studies on financing parks The IGNITION project](#)

Local authorities with corporate sponsorship programmes for public parks and greenspaces include Leeds, Bradford, Birmingham, Walsall. Nottingham City Council secures £100,000 annually towards its Nottingham in Bloom initiative.

In the case of Salford Parks Foundation we modelled sponsorship income as starting at around £13,000 annually in year 1 and rising to £16,000 in year 5.

Corporate social responsibility schemes: With increased focus on corporate sustainability, opportunities exist to develop larger packages of engagement with larger companies, including financial institutions, which might include sponsorship, team days, provision of in kind support and investment in the implementation of nature based solutions e.g. in order to improve water or air quality or sequester carbon dioxide through tree planting or soil improvements.

Corporate support is likely to be secured from high profile businesses with strong local connection such as long term historical connection, significant inward investment, major offices or headquarters, or an interest in nature based solutions e.g. to issues such as surface water flooding or air and water quality. In areas with high levels of development property investment companies might be willing to sponsor park improvements to contribute to place making and place improvement, over and above their S106 commitments.

Place based businesses such as shopping centre owners may also be willing to support parks close by to help regenerate and improve the quality of their surrounding environment.

Individual Donations

Individual giving to support parks through a range of methods including crowdfunding, legacies and direct general donations both large and small is being trialled in a number of locations.

A small donations trial started in 7 Salford parks in early 2022 and research from Leeds indicates that approximately 30% of local residents or visitors would consider making a small donation. 'Giving posts' in Bournemouth aim to generate small individual donations of £1-3 per month whilst a subscription scheme in Sheffield achieved 700 sign ups donating £10 per month. However it should also be noted that a key challenge to securing individual donations for parks is local disposable income, the existing quality of open spaces and the

perception that they are the councils responsibility and that they are already paid for through taxation³⁷.

Individual donations and legacies are often most easily secured where there is a personal and emotional connection to the park or parks or as part of a targeted fundraising campaign e.g. for specific capital improvement and restoration projects rather than for general expenditure. A recent Greater Manchester Parks Survey for instance found that respondents were most willing to support wildlife projects (72%), followed by planting of trees or woodlands (75%), projects to reduce the effects of climate change (57%) and community growing spaces (40%).

Large individual donations and legacies: These require a more focused and relational approach which may be facilitated through other activities such as membership and corporate support events. They are likely to be secured in relation to specific sites or improvements and include for instance memorial benches and plaques.

Crowdfunding: This comes in several forms including philanthropic, rewards based and investment or returns based crowdfunding. Investment based crowdfunding (e.g. community shares) is dependent on the legal vehicle (i.e. the ability to issue shares).

Key to crowdfunding is the ability to sell a story or narrative which requires communication skills and capacity in order to create these stories from the networks of contacts that already exist across the area's parks.

Other Potential Funding Mechanisms

There are a number of novel or emerging potential funding mechanisms that the Foundation could be well placed to develop and benefit but which are not yet fully developed and so are not included in the five year model presented as part of this business case.

Biodiversity Net Gain (BNG): This legislation is being brought in across the UK and there are opportunities to direct levies charged towards the improvement of local green spaces. It is currently understood that Local Authorities will have autonomy to determine where BDG

³⁷ [Charitable giving to parks and public spaces. Public and business opinion in Leeds. UK](#) (2019) Dr Anna Barker and Dr Jose Pina-Sánchez

levies are directed, and creating an early link (and policy) between this new legislation and any new projects or new organisation could establish a long term revenue stream.

Social Impact Bonds (SIBs): SIBs have been used for around 10 years and tend to target complex social problems such as social prescribing. Lewisham has been involved in SIBs related to HIV testing and supporting care leavers.

Usually there are four parties involved in a SIB:

- Commissioners, either central or local government bodies, responsible for the provision of public services.
- Service providers, who are responsible for implementing the commissioned public service. They are often non-profit organisations.
- (External) social investors, who cover the upfront running costs of the commissioned public service.
- Intermediaries, such as investment managers, who may be involved in securing contracts as well as public service development or delivery. Commissioners commit to repay investors their initial investment and a return, if pre-defined target outcomes are achieved (e.g. measurable improvements in health and wellbeing), so repayment depends on the success of the project.

Green Bonds: can provide debt finance for new capital projects that can deliver environmental benefits. The bond is not secured by revenue associated with the project but instead a general obligation. Green bonds are attracting non-traditional buyers, foreign investors, impact investors and younger, more socially conscious buyers. Guidelines provided by the Green Bonds Principles (GBP) indicate that 'green benefits' can include:

- Renewable energy (solar energy, wind power, hydroelectricity, geothermal energy)
- Sustainable resource use (recycled plastic to make playground equipment)
- Conservation (additional tree planting, relaxed mowing, wildflower growth and wildlife protection measures)
- Clean transportation (biofuels, electric vehicles and hybrid vehicles)
- Adaptation to climate change (flood resistance, temperature reduction through shade)
- Green buildings, which meet regional, national or internationally recognised standards

Current guidelines on what can be a 'green benefit' suggest that health, wellbeing and social outcomes are not directly 'green benefits'. However, generating income for green projects to benefit parks and open spaces will enhance and sustain existing health, wellbeing and social outcomes of these spaces.

Transport for London (TfL) issued a £400m green bond in April 2015 to help finance low carbon transport projects, such as low-emission buses, cycling improvements, and line upgrades. TfL's treasury team drove the process, getting buy-in from the Board, senior management, and other departments. Upon issue, the bond attracted global investors and was oversubscribed by 50%.

These financing mechanisms are often complex and linked to payment-by-results. They are usually associated with repayment of investment capital in some form (either debt or equity), and will generally need the support of a specialist adviser to establish them, and sophisticated financial skills to operate.

Whilst there are some Social Investment Bonds that have made use of parks, there are very few organisations leading on new social impact bond projects. Whilst the market for such bonds is underdeveloped there may be potential to build on the interest in increasing biodiversity, nature recovery and carbon offsetting, in order to create attractive investment proposition for both individual and corporate investors.

What Downham can do

Vision

Our vision is to maximise the opportunities for Downham residents to improve their health and wellbeing by engaging in sport and leisure activities in nature, whilst delivering on the area's community wealth building ambitions.

The ancient woodlands, 15th century pond, mesmerising views across south London, and stunning regeneration of the West side of Beckenham Place Park mean that the area has assets that are similar in scale to Hampstead Heath. However to maximise their contribution to community wealth building and the health and well being of Downham we need to have a unifying vision for their regeneration.

This includes supportive local planning policies, more collaborative project development and delivery, and the creation of an investment vehicle that can attract the significant funds available for long term low risk finance, stimulate local entrepreneurial activity and which maximises the involvement of the community alongside other stakeholders in their ownership, governance and management.

Outcomes

We want to work with the Lewisham Council and Phoenix Community Housing to develop ambitious collaborative initiatives that realise the potential of Downham's extensive green space assets to deliver on a range of local policy objectives including; community wealth building, health and wellbeing, the green space strategy, climate change and employment.

We believe that by working together we can realise the ambitions set out by Councillor Sophie McGeevor (Cabinet Member for Environment and Transport) in the introduction to the Council's green space strategy:

- To ensure that our green spaces are the heart and lungs for Lewisham, connecting active, healthy, and vibrant local communities'.
- That they create direct social value providing health and wellbeing for local residents by encouraging recreational opportunities and supporting active lifestyles.
- They improve the economic performance of the borough by supporting town centres, retaining employment, and attracting new businesses and skills; and by increasing the value of domestic and commercial properties.
- This will enable the whole community – residents, community organisations, voluntary and statutory agencies and businesses – to work in partnership to obtain the maximum benefit from our open spaces.
- To involve both partners and the whole community in shaping the future of our open space.
- To provide sustainable management and community involvement of our open spaces to help to make Lewisham the best place to live, work and learn.

Community Wealth Building

New approaches to the management, ownership and financing of Downham's green spaces have the potential to deliver on the key principles of community wealth building; plural ownership of the economy, making financial power work for local places, fair employment and just labour markets, progressive procurement of goods and services, and socially productive use of land and property.

They could also play significant role in meeting the recommendations of the 2020 CLES community wealth building report, namely:

- Deepening the community wealth building approach by focussing on building a more socially, economically and environmentally just and resilient local economy, and decarbonising Lewisham and responding to the climate emergency.
- Growing the community wealth building approach by focussing on land and property and how this might be managed to be more socially productive.

As a significant land owner, Lewisham Council has the opportunity to use its land holdings in a socially virtuous way to build community wealth, and to pluralise and democratise the ownership of the economy by supporting the development of more SMEs, and municipally owned companies and enterprises owned by workers, including co-operatives and mutually owned businesses.

Health and Wellbeing

Lewisham's green spaces provide a total value of £2.1 bn; including £215 million (£39 / person / year) in mental health savings and £371 million (£68 / person / year) in physical health savings. Increased investment, improvement and animation of those spaces has the potential to significantly increase the value they provide.

The Birmingham and Lewisham African Caribbean Health Inequalities Review (BLACHIR)³⁸ report identified that lack of good quality green space "contribute to worse health and inequalities, and that these must be improved alongside action in health and social care services, otherwise the gaps will persist", whilst the recent community health research

³⁸ [The Birmingham and Lewisham African and Caribbean Health Inequalities Review, 2022](#)
December 2022

pilot³⁹ identified that Parks are seen as good and affordable spaces for families and children and that residents would like to see better amenities in parks such as toilets, outdoor gym equipment and water fountains, and more community events whilst ensuring that they remain low cost and accessible.

A more collaborative approach to the management, ownership and financing of Downham's green spaces has the potential to support the delivery of Lewisham's health strategy which advocates for a community-based approach to creating the conditions that make healthier lifestyle choices easier for individuals and families, and and to meet local priorities which include; achieving a healthy weight, and improving mental health and wellbeing.

Green economy

Lewisham ranked 42nd (of 333 local authorities) with 193 Ha of suitable green space (including amenity land, playing fields, public parks and tennis courts) capable of generating 43 MW (equivalent to a CO² saving of over 12,000 tCO²e/yr). This places Lewisham in the top 15% of local authorities with the potential to develop significant ground source heat. The development of new sustainable district heating has the potential to help address issues of energy security and fuel poverty, provide green energy to new developments and could be linked to a wider programme to retrofit existing local properties to make them more energy efficient and affordable to heat.

New approaches to the ownership, management and financing of the area's green spaces also provides opportunities for new enterprises to be developed ranging from bike hire to sports and leisure activities such as archery and outdoor swimming to the potential to develop green tourism opportunities including accommodation, activities and walking and cycling routes, capitalising the area's extensive views and proximity to central London.

How we can make this happen

Who should be working together

There is already very effective joint working happening in Downham between Sevenfield Primary Care Network and Downham Dividend Society, most notably in the development

³⁹ [Downham community health research A pilot study. 2022. Social Life](#)

and delivery of this work and in the community health research pilot study undertaken with Social Life.

The Council and Phoenix Community Housing are also key stakeholders as the owners and managers of the area's significant green spaces.

Planning

Local Plan

Whilst current planning policy seeks to 'protect' and 'enhance' local green spaces it does not build detailed links between how local land use can help to deliver other council and community priorities such as health and wellbeing, community wealth building and climate change, although the council's Parks and Open Spaces Strategy 2020 – 2025 outlines some land use management strategies that aim to tackle those challenges

Nationally, and in some other local authorities, there is now some overdue recognition that there needs to be a policy framework that binds development planning and land use together, so that they both make complementary and integrated contributions to the achievement of public policy outcomes.

This challenge is being addressed by Defra, and is the subject of a House of Lords Committee inquiry into Land Use in England, which recently published its report calling for a multifunctional approach to the land, with multiple benefits being achieved in the same place⁴⁰. The government has also announced its intention to bring forward a national Land Use Framework, next year, within which local land use frameworks can be drawn up by landowners, councils and communities.

Both Southwark Council in London and Liverpool City Region⁴¹ have initiated local land commissions to explore how the ownership, governance and management of public land can support their wider objectives, with a particular focus on how public land can support community wealth building.

⁴⁰ [Making the most of England's Land, 2022, House of Lords Land Use in England Committee](#)

⁴¹ <https://cles.org.uk/tag/land-commission/>

Action: Local stakeholders in Downham should participate in and respond in writing to the Regulation 19 consultation on the Lewisham Local Plan this spring, and aim to make representations to the Planning Inspector at the Examination in Public on the final draft, and which will need to be grounded in any response to the Regulation 19 consultation. This should focus on the need for local planning policy to move beyond protection and enhancement and to set out detailed links between how local land use can help to deliver other council and community priorities such as health and wellbeing, community wealth building and climate change. e.g. through the development of a Supplementary Planning Document on parks and green spaces.

Neighbourhood Planning

There is scope to add Downham into the programme of Neighbourhood Development Plans, which the Council is committed to supporting, as the most constructive way of getting a firm grip on policy making and planning decisions.

However, the timescale and resources needed for an NDP are considerable, place responsibilities on communities that need to be well understood and accepted before starting, and can take up to 5 years to be adopted. Information, advice and support on developing a neighbourhood Plan can be found on the MyCommunity website⁴².

Action: Local stakeholders in Downham should explore the process and appetite for the development of local Neighbourhood Plan, in particular making links with other Neighbourhood Forums; e.g. Grove Park which has been identified as having the most rounded and integrated approach to the relationship between green space and health and wellbeing, both in optimising the uses of existing green space, and upping the quality of new development and non-green open spaces in which people spend much of their time.

Collaborative working

Recent community health research demonstrated that local residents value their local green spaces for their positive impact on physical health and wellbeing. Parks are seen as good and affordable spaces for families and children. Residents would like to see better amenities in parks such as toilets, outdoor gym equipment and water fountains, and more community

⁴² <https://mycommunity.org.uk/neighbourhood-planning>

events whilst ensuring that they remain low cost and accessible⁴³.

There is great appetite, creative thinking and energy in Downham to generate more social, environmental and economic value from the area's extensive, but under-managed, green spaces including; improving accessibility and variety of sporting and recreation facilities, developing renewable energy via district heating schemes, and establishing visitor facilities such as urban glamping to capitalise on the areas transport links and extensive views.

Currently there is a lack of investment in the green spaces in the area which is reflected in poor quality, in accessible and underused spaces which fail to deliver on their scale, situation and potential.

In particular there is a hunger for a joined up approach to the improvement of the areas green spaces and associated sporting and leisure assets that can contribute to the improvement of the physical and mental health and wellbeing of local people and to the community wealth building agenda by supporting the development of local community owned and run enterprises that can generate new opportunities for residents and contribute to the locally rooted regeneration of the area.

The case studies highlighted above indicate a range of potential routes to collaboration that could deliver on these objectives.

Collaboration to deliver projects

The Parks for Health project developed and delivered by Camden and Islington provides a model for collaboration between the local authority, health professionals and the voluntary and community sector.

It required the local authorities not only to commit to a co-production approach to the delivery of the project, but to make long term structural and strategic changes that recognised the need to change the culture and roles of council delivery teams and to influence other internal and external stakeholder to adopt a 'parks for health' framework to their own work programmes and budgets.

⁴³ [Downham community health research A pilot study. 2022. Social Life](#)

Such an approach could be funded by a mixture of internal local authority funds and external grant funding. Whilst not necessarily reducing the core delivery costs of the council they have the potential to engage local community networks in activities that add value and attract external funding, increasing the overall investment in the area's parks, and increasing their use in ways that support residents to improve their health and wellbeing.

Whilst supporting the delivery of health and wellbeing objectives this approach is unlikely to make a significant contribution to community wealth building as it only provides limited opportunities for enterprise development and does not place land or assets in the democratic control of communities. It is also unlikely to make a significant contribution to meeting climate change objectives.

Collaboration to add value

The development of Parks Foundation models demonstrate how local authorities can support the establishment of new organisations (or the development of existing local organisations) with a dual purpose of raising funds to increase investment in an area's parks and supporting local communities to develop more parks based activities.

Whilst Parks Foundations often focus on securing grants and donations they are likely to work most effectively and sustainably when assets are transferred to them (on a freehold or long leasehold basis) which can be used by them, or by third parties, to run activities and develop enterprising approaches to generating income.

Income generating assets and functions might include car parking, buildings, sports pitches and the right to issue concessions and licences for use and events.

If established with the specific purposes of supporting activities and investing in parks to create opportunities for improved health and wellbeing, addressing climate change, and supporting community wealth building through local enterprise development, the organisation would be capable of contributing effectively to all three agendas.

In this model, as with the project based approach above, the local authority would retain the overall responsibility for day to day management of the parks and open spaces. Any new organisation would add value through fundraising, investment, enterprising management of selected assets and animating the use of the parks by running its own activities and supporting the activities of others.

Collaborating to create new management and governance models

In both of the approaches above the local authority retains the ownership and day today management responsibilities for the parks and open spaces. Parks Trust models create an organisation which can take on the freehold or very long leasehold responsibility for the ownership and management of the spaces and their associated assets.

They generate income through a mixture of grants, donations and commercial income, and can involve local people and other key stakeholders in the governance and decision making relating to their use management and development.

If established with the specific purposes of supporting activities and investing in parks to create opportunities for improved health and wellbeing, addressing climate change, and supporting community wealth building through local enterprise development and local democratic control , the organisation would be capable of contributing effectively to all three agendas.

Freehold ownership, or long leasehold, opens up new opportunities for the Trust to raise finance through grants, loans and investment, and enables it to act more freely to maximise the value created by the assets in its stewardship, e.g. through the development of renewable energy generation or new leisure and tourism activities. It also provides the opportunity for a more joined up approach to securing investment in and the development and enhancement of the asset base.

Community ownership or cooperative models can ensure local democratic ownership is maintained and creates opportunities for enhanced community engagement in decision making.

A spectrum of different potential collaborative models is shown below.

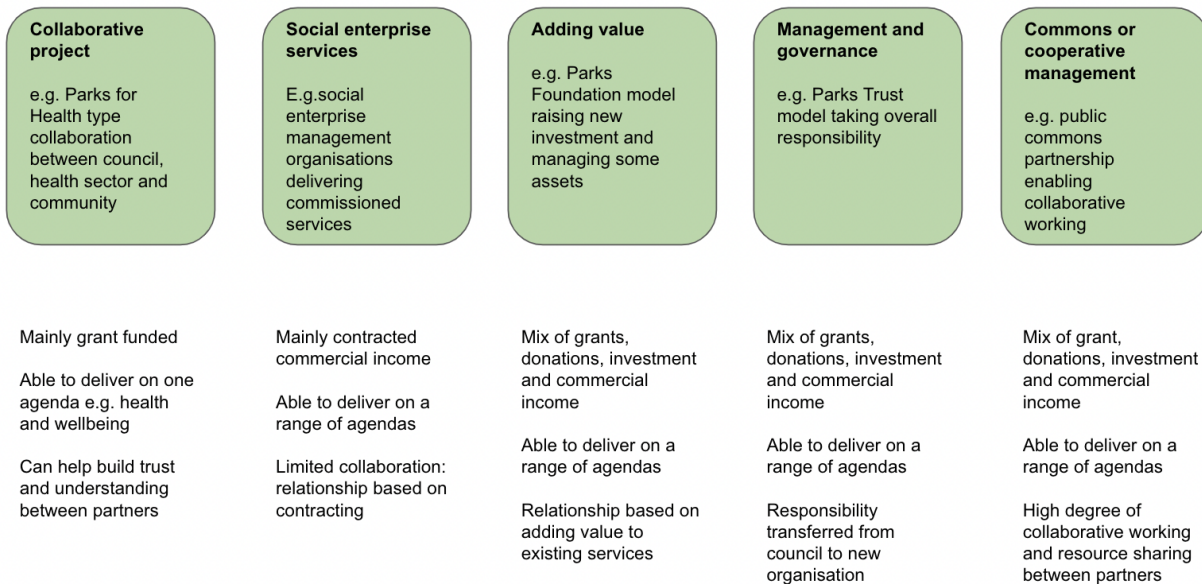


Figure 15: A spectrum of potential collaborative models for Downham / Lewisham

Action: Local stakeholders in Downham from the council, housing, health and community sectors should consider these different approaches to greater collaboration in order to bring about the improvement of Downham's green spaces to deliver inclusive and accessible health and wellbeing, climate change and community wealth building objectives. This should include consideration of their appetite, commitment and the opportunities and barriers for developing more collaborative approaches.

Legal structures

The delivery of more collaborative projects such as 'Parks for Health' type approaches would not require the establishment of any new legal structures to undertake the work.

Parks Foundations and Parks Trusts are most often established as charitable organisations, e.g. Company with Charitable Status, a Charitable Incorporated Organisation (CIO), or Charitable Registered Society / Community Benefit Society. Charitable status confers some tax advantages and opens a wider range of fundraising opportunities with respect to securing grants and donations, however they tend not to be highly democratic with power resting with the trustee board.

The Community Benefit Society legal structure provides a highly democratic structure where members must have a controlling vote in Annual General Meetings and the board, though other stakeholders (including investors) can be included in the governance. It is also a legal form which can issue community shares to raise capital.

Community Land Trusts (CLTs)⁴⁴, democratic, non profit organisations that own and develop land for the benefit of the community, are not a legal form but they are defined in law and must; benefit a defined local community, be not for profit, enable local people to join as members, and be controlled by its members. Whilst most associated in the UK with community led housing, CLTs can manage a wide range of assets including community gardens, civic buildings, pubs, shops, shared workspace, energy schemes and conservation landscapes. They most often adopt the Community Benefit Society legal form and may also be charitable.

When establishing any new organisation it is important to follow the principle that 'form follows function' so time should be spent agreeing the desired purpose and ways of working of the organisation before considering the most appropriate legal structure or structures.

In the case of the more innovative models outlined above (public commons partnerships and ecosystem or greenspace services cooperatives) these are likely to require new cooperative legal structures (such as Community Benefit Society or other Registered Society models). They provide the potential for multiple stakeholders to work effectively together for a shared purpose.

Action: Local stakeholders in Downham from the council, housing, health and community sectors should consider the potential for new ownership, stewardship and management models such as a Parks Trust. Any new model should enhance local democratic ownership and control of land and property. It should be capable of unlocking the potential of

⁴⁴ <https://www.communitylandtrusts.org.uk/>

Downham's green spaces by securing new investment and catalysing new economic activity focussed on meeting the needs of the local community, whilst delivering on the council's community wealth building, health and wellbeing and climate change ambitions.

Recommendations and actions

We believe that Downham's extensive green space assets have the untapped potential to deliver on a range of local policy objectives including; community wealth building, health and wellbeing, the green space strategy, climate change and employment.

However to maximise their contribution to community wealth building and the health and well being of Downham we need to have a unifying vision for their regeneration.

This includes supportive local planning policies, more collaborative project development and delivery, and the creation of an investment vehicle, such as a Parks Foundation or Parks Trust, that can attract the significant funds available for long term low risk finance, stimulate local entrepreneurial activity and which maximises the involvement of the community alongside other stakeholders in their ownership, governance and management.

Increased collaborative project development and delivery have the potential to enhance the delivery of local benefits such as improved use by local residents for health and wellbeing. However, transformative change and the delivery of community wealth building objectives are most likely to be delivered through the creation of a new investment and stewardship vehicle such as a Parks Trust. Whilst these traditionally use a charitable model there is potential to explore more democratic models such as the community benefit society or community land trust models, or emerging multi stakeholder models such as Public Commons Partnerships.

The following actions have been identified above.

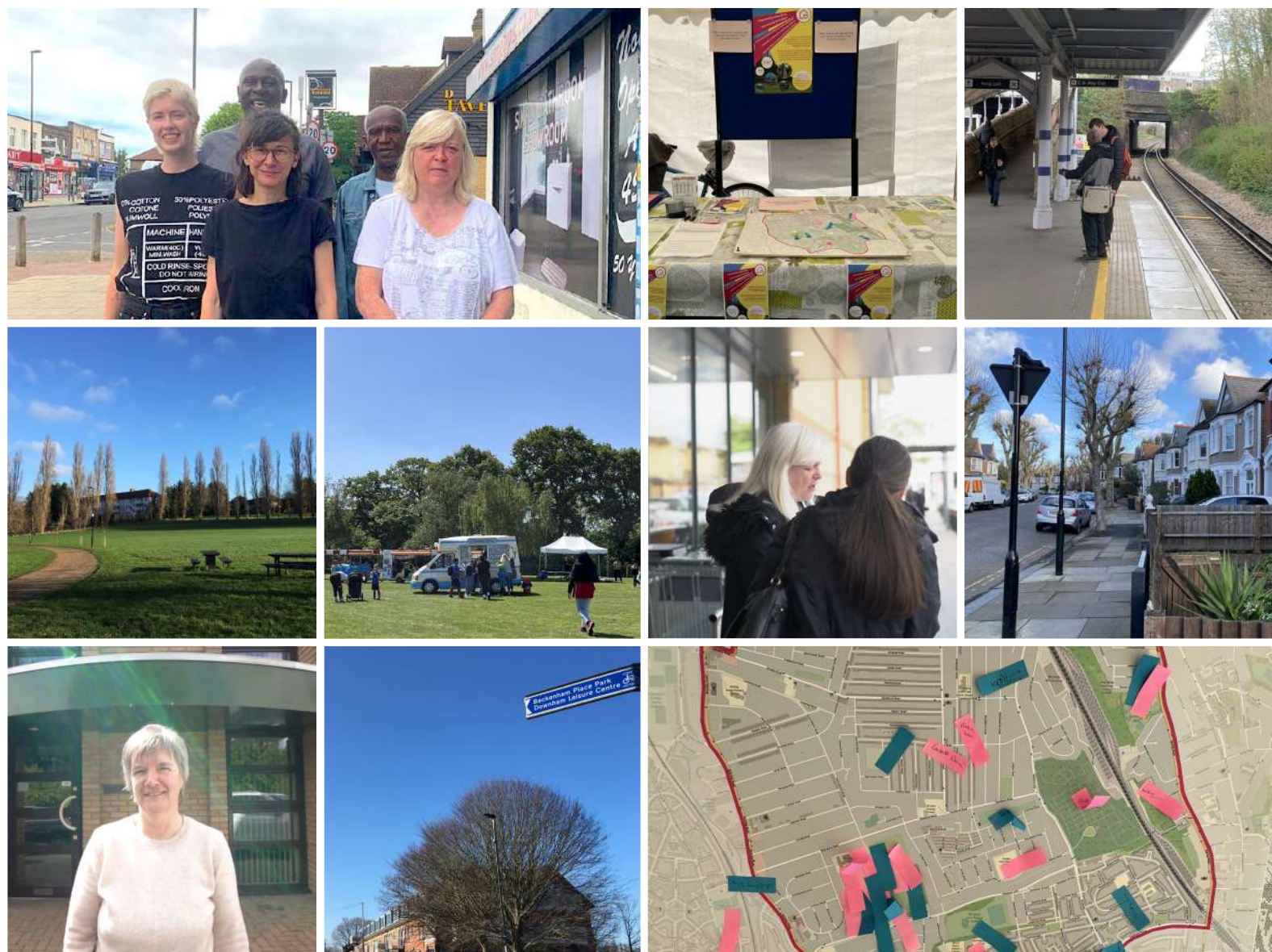
Action: Local stakeholders in Downham should participate in and respond in writing to the Regulation 19 consultation on the Lewisham Local Plan this spring, and aim to make representations to the Planning Inspector at the Examination in Public on the final draft, and which will need to be grounded in any response to the Regulation 19 consultation. This should focus on the need for local planning policy to move beyond protection and enhancement and to set out detailed links between how local land use can help to deliver other council and community priorities such as health and wellbeing, community wealth

building and climate change. e.g. through the development of a Supplementary Planning Document on parks and green spaces.

Action: Local stakeholders in Downham should explore the process and appetite for the development of local Neighbourhood Plan, in particular making links with other Neighbourhood Forums; e.g. Grove Park which has been identified as having the most rounded and integrated approach to the relationship between green space and health and wellbeing, both in optimising the uses of existing green space, and upping the quality of new development and non-green open spaces in which people spend much of their time.

Action: Local stakeholders in Downham from the council, housing, health and community sectors should consider the different approaches to greater collaboration set out in this report. This should include consideration of their appetite, commitment and the opportunities and barriers for developing more collaborative approaches in order to bring about the improvement of Downham's green spaces to deliver inclusive and accessible health and wellbeing, climate change and community wealth building objectives.

Action: Local stakeholders in Downham from the council, housing, health and community sectors should consider the potential for new ownership, stewardship and management models such as a Parks Trust. Any new model should enhance local democratic ownership and control of land and property. It should be capable of unlocking the potential of Downham's green spaces by securing new investment and catalysing new economic activity focussed on meeting the needs of the local community, whilst delivering on the council's community wealth building, health and wellbeing and climate change ambitions.



Downham community health research

A pilot study

September 2022



This report describes the findings of a community research project carried out by Social Life, Downham Dividend Society CLT and Downham residents between March and June 2022.

More about this research is on our website, http://www.social-life.co/project/downham_community_research/

We would like to thank the residents who shared their knowledge, hopes and concerns with us. We are grateful for their expertise and the time they put into this work and hope the report will help bring about the changes they would like to see in their local areas. The report was written by Olimpia Mosteanu with contributions from Nicola Bacon, Izzy Gibbin and the residents who shared their views about Downham with us.

Research team: Nicola Bacon, Tony Fairclough, Izzy Gibbin, Olimpia Mosteanu, Tim Oshodi, Janine Zapple.

Social Life was created by the Young Foundation in 2012, to become a specialist centre of research and innovation about the social life of communities. All our work is about the relationship between people and the places they live and understanding how change, through regeneration, new development or small improvements to public spaces, affects the social fabric, opportunities and wellbeing of local areas. We work in the UK and internationally.

[@SL_Cities](http://www.social-life.co)

Downham Dividend Society Community Land Trust was founded to continue the wider regeneration work of Fusions Jameen's Black-led community self-build schemes. It considers the Downham community as an asset and its social bonds of economic value. It promotes a community wealth building approach which seeks to maximise community-led regeneration strategies to tackle the intergenerational poverty and health inequalities which impact Downham.

<https://www.facebook.com/downhamhealththroughsport/>
<https://www.facebook.com/greenwomanoasisproject/>

Sevenfields Primary Care Network (PCN) is a group of six local General Practices working together to improve health and wellbeing for our patients. As well as providing the best medical care we can we aim to encourage health promotion and work with our community, the council and voluntary sector to establish and promote activities that themselves improve health hence commissioning this important report and installing four outdoor gyms in our local parks and greens.

<https://www.sevenfieldspcn.nhs.uk>

1 Research approach.....	3
1.1 About this community research project pilot.....	3
1.2 Methods	6
2 Main findings.....	8
2.1 Local assets	8
2.2 Social capital and networks of support.....	9
2.3 Local concerns and barriers	13
2.4 Supporting health and wellbeing in the future	15
3 Recommendations	16

1 Research approach

This report summarises the findings of the community research pilot carried out by Social Life and Downham Dividend Society Community Land Trust between March and June 2022. We worked with Downham residents to identify local strengths and needs. The research was commissioned by Sevenfields Primary Care Network.

1.1 About this community research project pilot

Downham is an area of Lewisham that is recognised as facing challenges, particularly long-term underfunding. Downham has a diverse population, but community relations have been complicated over the years. There is awareness among local activists that Downham has received less investment than parts of the borough to the north. Deprivation, measured by the Indices of Multiple Deprivation, is high in Downham, and the number of children living in poverty is high as well. Parts of Downham fall into the Bromley council area, deprivation here is less pressing than on the Lewisham side.

The community research had two main goals: to train and support residents to carry out research, and to understand what is supporting and undermining health and wellbeing in Downham. The lived experience of the residents who were trained as researchers made it easier to connect with communities and helped the team identify local issues that matter to people living in and around the area. Community researchers were involved in all the stages of the research. This helped researchers feel ownership over the research process, which helped their confidence and trust in their abilities as well as developing skills and wider social networks.

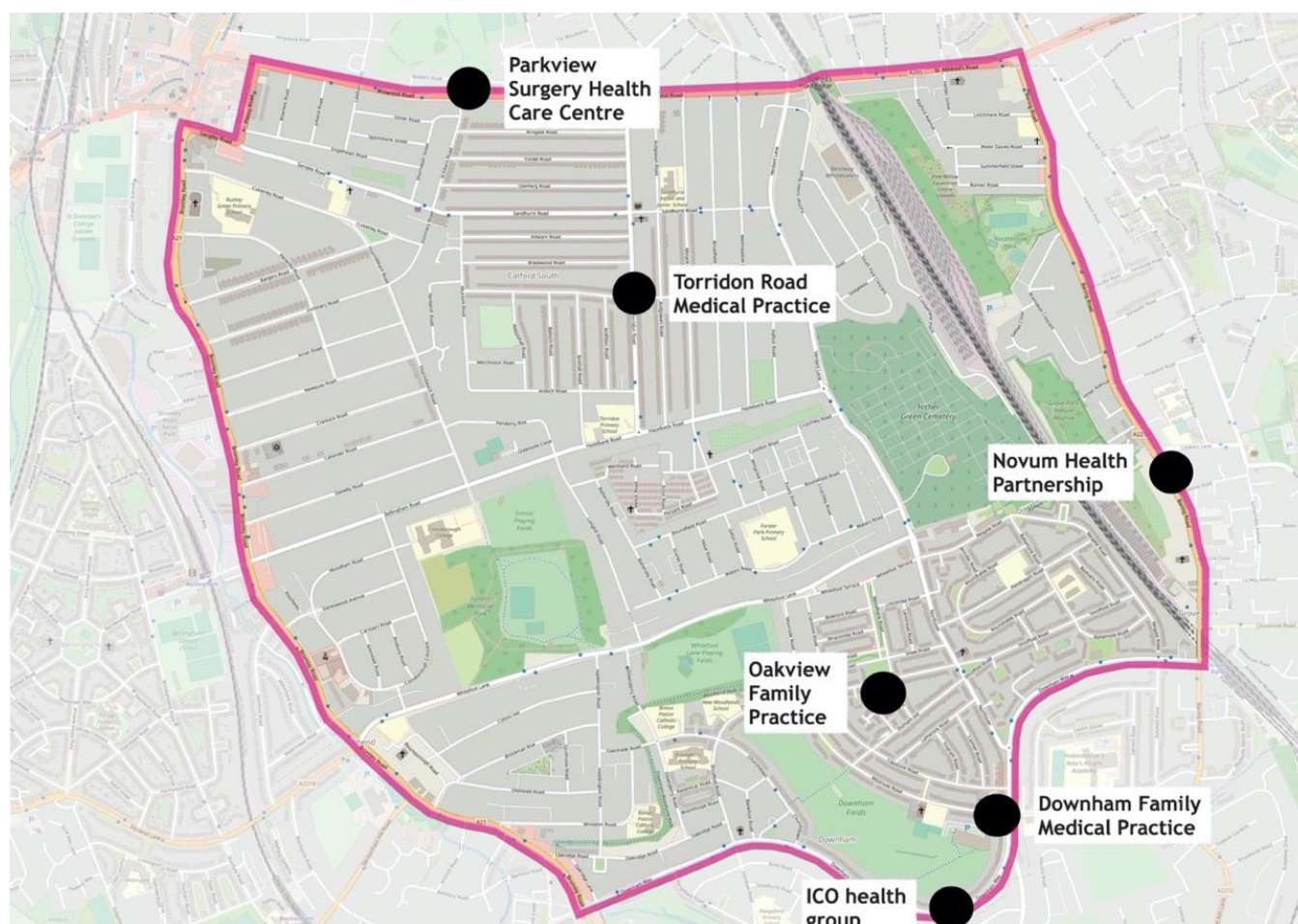
The community research pilot showed that

1. **Parks and green spaces are key local assets.** They are valued for their positive impact on physical health and wellbeing. Parks are seen as good and affordable spaces for families and children.
2. **Residents would like to see better amenities in parks** such as toilets, outdoor gym equipment and water fountains, and more community events.
3. **Local amenities and events need to be low-cost and, ideally, free for those who cannot afford the cost.** Amenities and events need to be accessible to people with different needs, and accommodate people with reduced mobility, those who need work-friendly hours or on-site childcare provision.
4. Many residents appreciated their relationships with neighbours, felt at home in their communities, and **valued their ties and connections across the local area.**
5. **More community activities and venues are needed.** Locals noted that some groups are particularly underserved at the moment, including children, young people, older people, and vulnerable groups (especially those experiencing mental issues).
6. **The lack of information about what is available in the area** is a key challenge for Downham residents.

Recently, the Lewisham African Caribbean Health Inequalities Review has set out a number of research and evidence gaps. It shows the need for more research “to help to address knowledge gaps across the themes and...help identify the most effective culturally sensitive interventions to address health inequalities affecting Black African and Black Caribbean populations”. The review identifies 39 opportunities for place-based action - from early years services to education, youth provision, and wellbeing. Successful implementation of these actions depends on a detailed understanding of local neighbourhoods, support ecosystems and relationships between various local groups.

Like the approach championed by the Lewisham African Caribbean Health Inequalities Review, this community research pilot recognised the importance of existing relationships and local partnerships, and it took a place-based approach. The trust built over time between Sevenfields Primary Care Network and Downham Dividend Society Community Land Trust ensured the success of this pilot. Working in partnership with residents to co-produce research tools and approaches to data collection that reflect place-based needs takes time and substantial effort¹. Existing working relationships, however, played a key role in making sure that the research could remain flexible and responsive to the challenges raised by the context in which our work took place. Even with these relationships in place, it took partners 18 months to put the project together. Place-based community research projects need time and commitment to build the partnerships needed to sustain them. Dr. Helen Tattersfield’s long-term commitment to Downham was key to this approach.

The community research took place close to local community centres and Sevenfields GPs



¹ This has been flagged by a range of community research projects, and it was well-documented by many of the peer / community researchers who participated in the [peer research conference](#) organised by the Young Foundation in March 2022.

Downham Dividend Society Community Land Trust played a key role in bridging between different groups locally and provided insight into existing networks of support. This way of working made sure that the community research pilot connected with people who were already working to improve their local communities. The approach has also tried to establish new partnerships between local mutual aid networks, researchers, and commissioners who are interested in supporting health and wellbeing.

The community research took place near community centres and GPs part of Sevenfields Primary Care Network. These included Parkview Surgery Health Care Centre, Torridon Road Medical Practice, Novum Health Partnership, Oakview Family Practice, Downham Family Medical Practice, and ICO Health Group.

Social Life and Downham Dividend Society Community Land Trust invited over 25 local people to take part in the research training sessions, which took place in March 2022. The goal was to work with people who were already active in their local communities as volunteers and activists, who were interested in learning more about social research. In February and March, we also worked with local social prescribing partners to recruit some of their users to become part of the research team. Because of outreach barriers such as lack of time and resources no social prescribing users were able to join the research training.

The Downham research team included three people, who were employed as researchers. They came from different backgrounds and brought their own lived experiences to the work. Sustained engagement was needed to build up their confidence and the skills needed to carry out research. This engagement work was integral to the project, and to meeting the goals set up for this community research pilot, including that of supporting people to become more aware of the value of their participation in local initiatives. Several other people were keen to be involved in the project but, in the end, could not join. For some this was because of lack of confidence, anxiety, lack of childcare, and the fast-paced project timescale. Poverty and lack of time were both key barriers to participation.

The training sessions allowed us to learn from each other and co-produce the research approach



1.2 Methods

The research used a combination of methods to make sure that people from a wide range of backgrounds took part. This allowed the researchers to gain a detailed understanding of what supports the health and wellbeing of Downham residents, and the challenges they are facing.

The mix of methods also allowed the team to build on the skills and interests of the residents who were trained to carry out the research. This pilot did not aim to gather data that would be representative of the Downham population. Instead, it tried to provide a detailed initial account of the factors that impact on health and wellbeing locally. This was done by identifying the themes that cut across individual experiences and the in-depth accounts we heard.

We hope future work will develop this pilot to capture an even wider range of local voices and further evidence the place-based health-related experiences of Downham residents.

Overview of the methods used



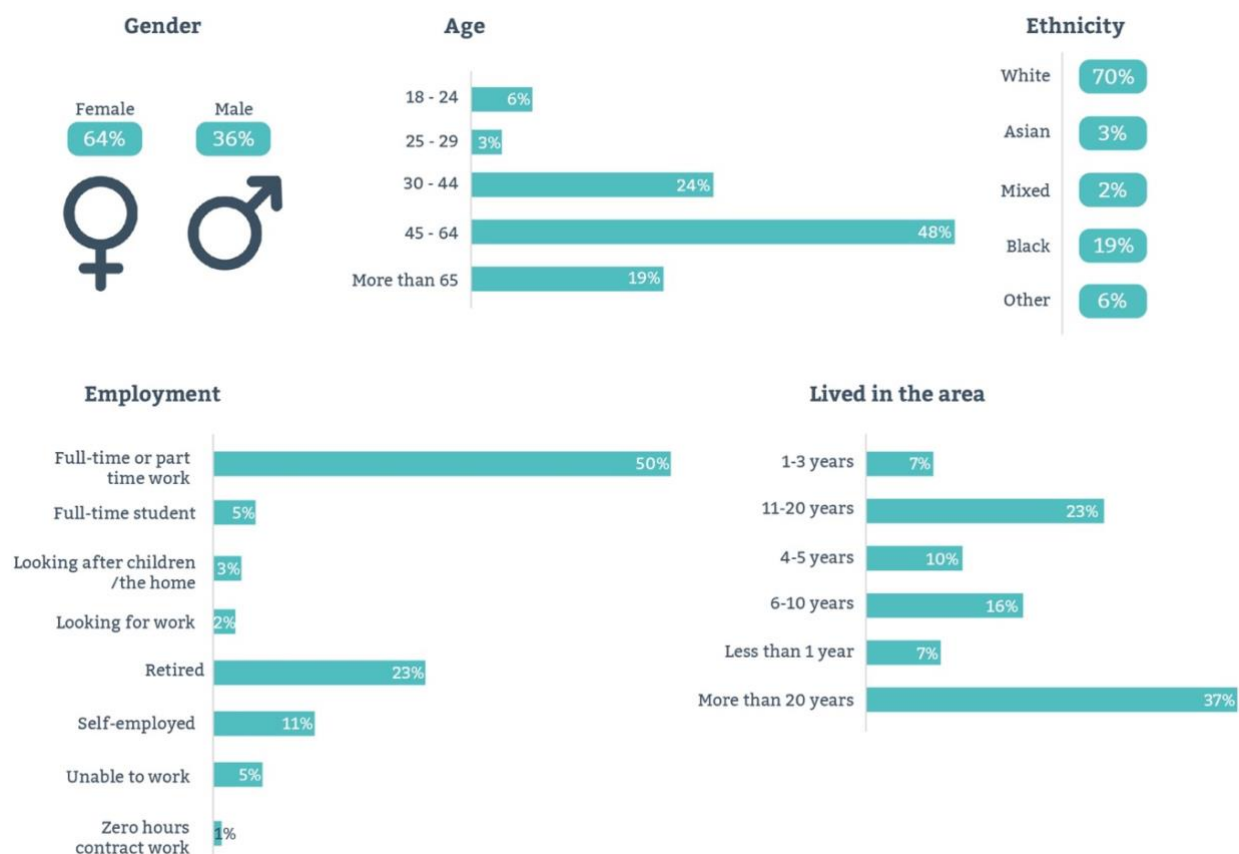
The research team carried out **137 street interviews** with residents. The street interviews captured snapshots of residents' experiences and their perceptions of daily life in Downham. Street interviews were carried out in busy places including in front of local shops, parks, train stations, community centres, and a COVID vaccination hub.

Six group discussions were also conducted, two with members of a local boxing club and some of the parents of younger users of the club. Two other group discussions took place with members of a local church, which was identified as an important community asset. The other two discussions involved a walking group and a group of social prescribing users.

We carried out **10 walking interviews**. We asked Downham residents about their connections to local places, and their thoughts on how these places support or undermine health and wellbeing locally. The majority of the walking interviews took place in or around local parks and green spaces.

The quotes used in this report have been edited for clarity.

Profiles of participants in street interviews (N=137)



Downham researchers carried out street interviews in April and May 2022



2 Main findings

2.1 Local assets

The research showed that parks and green spaces are important local assets. Downham residents see them as valuable resources that support their physical health and wellbeing. Locals said that green spaces and parks are affordable spaces for families and children, unlike other local amenities.

I like to go up to 'The green' sometimes. I've got a lovely space near the church on Downham Way there. 'The green' is a stop on the 181 route, a small patch of green that's above Shroffold. I also like Downham Fields, which is another place I'll head out to just for some thinking time. Organise my thoughts if I need some space from things.

Walking interview, June 2022

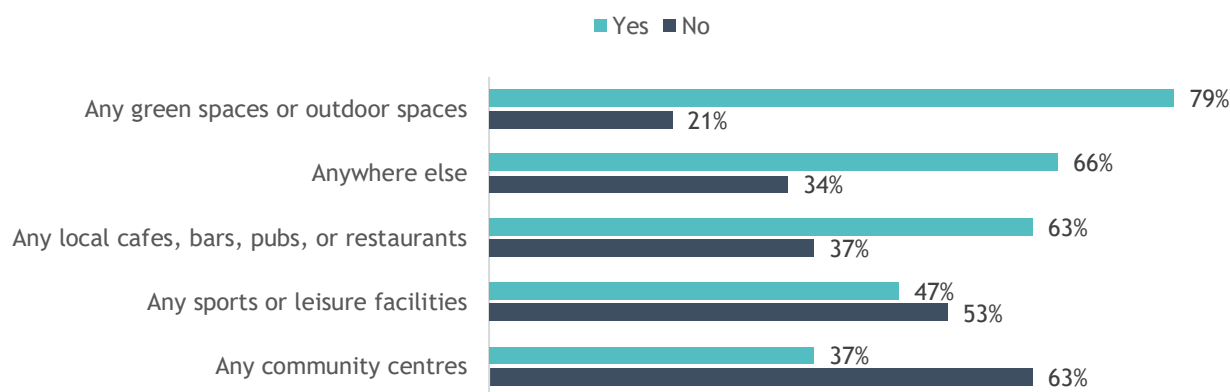
In the street interviews, 23 different green spaces were mentioned by people interviewed as places that they had visited over the last month. Forster Park, Beckenham Place Park and Mountsfield Park in Lewisham were the most popular. The spaciousness of Downham's parks is highly valued. Some people also mentioned the variety of wildlife, with opportunities to see animals and forage for food.

Green spaces are an important asset in Downham



When asked about the places in the local area they went to in the last months, far fewer Downham residents said they went to a community centre than to parks.

Places in Downham where people interviewed went to in the last month



(N=137, street interviews data, multiple choice question)²

Some of Downham's leisure and support facilities were also seen as local resources, though they were mentioned less often than parks and green spaces. The ones that were spoken about most often were Downham Leisure Centre, Abbotshall Healthy Lifestyle Centre, and Goldsmiths Community Centre.

"I think the local authority needs to invest more money. Not just in community centres but in Sure Start Centres that are closed down. I think that's short sighted because children need that early years support, mothers need that support. Closing those centres down just widen the gap."

Walking interview, June 2022

Thinking about what would make them use support and leisure spaces more, residents spoke about increasing accessibility, especially in terms of timings, price, or disabled access. Residents also reported that there needs to be more information about what is going on locally. We will discuss these issues in more detail in the next sections focused on local challenges and barriers.

2.2 Social capital and networks of support

Many Downham locals said they had good relationships with their neighbours, felt at home in their communities, and valued their ties and connections across the local area.

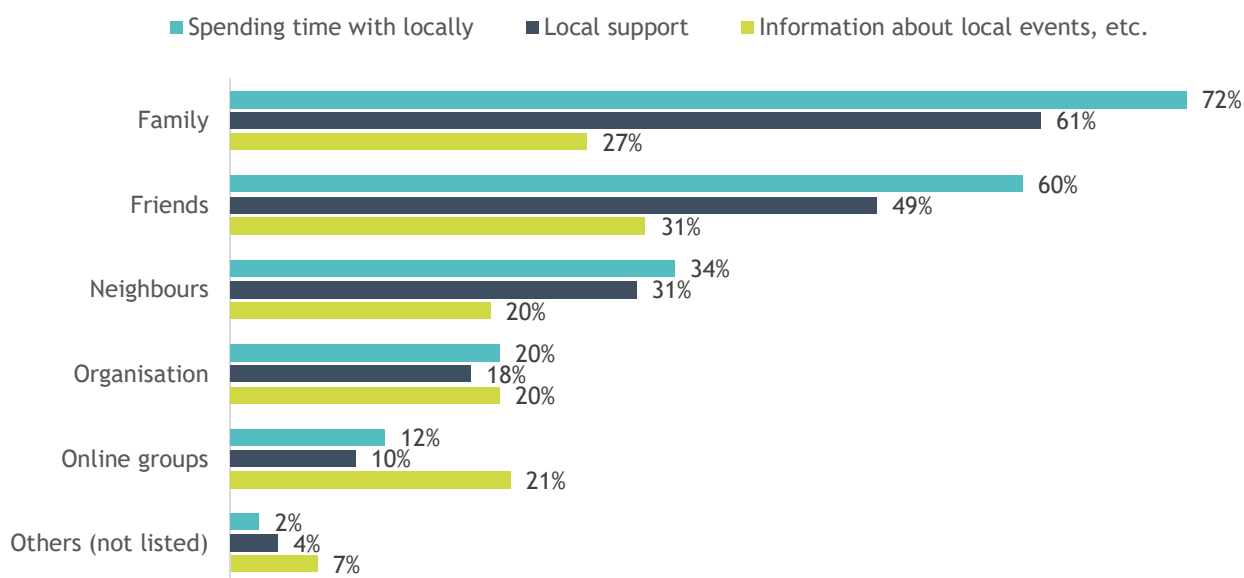
"I feel very at home here, that everybody knows me and I know everybody, I've got good support and made friends, so have the children. [...] Everything feels warm and welcoming living here. The people that live here, the shopkeepers, the small businesses, everyone knows everyone around here. Like a small Irish village, you can't leave your house without waving to people."

Walking interview, June 2022

² "What places in your local area have you been to in the last month?"

The street interviews revealed that family and friends are the most important local ties. Family and friends, and to a lesser extent neighbours and organisations, make up a complex ecosystem of local support for socialising, help or finding out information. The research shows that the weakness in this is that there are not enough people around who know what is going on in Downham. We will come back to this issue later in the report when we discuss local challenges and the changes that residents would like to see.

Social networks in Downham (N=137, street interviews data, multiple choice question)³



The walking interviews and group discussions helped us gain a better understanding of the places where locals gather to hang out with friends, family or meet their neighbours. These include parks and leisure centres, but also gyms, churches, cafes and the local libraries.

"[The gym I go to locally] is really cheap and it's got great classes and an amazing array of equipment. I like the vibe, it's super friendly and welcoming. I don't feel self-conscious there at all and there's many friendly faces I see every day. There's a nice social element linked to it and I believe all those people are local. [...] You're able to stop and have a chat, check in with how people are doing, it feels like every time you go there, you'll recognise the same faces, gives you a feeling of community, networking, the same people are coming together at the same time. And classes as well I see the same faces.

Walking interview, June 2022

³ The questions were asked in the street interviews to gain insight into social networks: "Who are the people you spend time with in your local area?", "Who do you turn to for support in your local area?", and "Do you know someone in your local area who is a useful source of information and who always knows what is going on locally?"



The map displays the Bromley area with 63 numbered locations. A pink shaded region highlights a central area, likely the focus of the study. The locations are numbered 1 through 63, with some numbers appearing multiple times. The map includes various landmarks such as hospitals, schools, and parks.

Green spaces or other outdoor places

- 1 Forster Memorial Park
- 2 Beckenham Place Park
- 3 Mountsfield Park
- 4 Downham Fields
- 5 Abbotshall Healthy Lifestyle Centre
- 6 Ladywell Fields
- 7 Manor House Gardens
- 8 Woodland Walk
- 9 Chinbrook Meadows
- 10 Durham Hill
- 11 Hither Green Cemetery
- 12 Blackheath
- 13 Shaftesbury park

Community centres

- 14 Abbotshall
- 15 Downham Leisure Centre
- 16 Goldsmiths Community Centre
- 17 Corbett Library
- 18 Elim Pentecostal Church
- 19 Grove Park Community Group
- 20 Wavelength Lewisham
- 21 Ten Em Bee
- 22 Dumps Adventure Playground
- 23 Donderry Children's Centre
- 24 Burnt Ash Children and Family Centre
- 25 Greenwich Community Centre
- 26 Salvation Army
- 27 Scouts
- 28 Bromley and Downham Youth Club
- 29 King's Church

 Boundary of Research Area

 Frequency of mentions

Local cafes, bars, pubs, or restaurants*

- 30 Kings Diner
- 31 Le Delice
- 32 Resta Coffee
- 33 Mountfield Park cafe
- 34 The Summerfield Pub
- 35 Abbotshall
- 36 George's Bromley
- 37 Downham Tavern
- 38 Caffè Tesoro
- 39 Wanderlust Eatery
- 40 Manor House Gardens Cafe
- 41 McDonald's
- 42 Kelsey House Bar and Kitchen
- 43 Bridge Bar
- 44 Debenhams (permanently closed)
- 45 Keikik Kitchen
- 46 Pizza Express
- 47 Arloe and Moe
- 48 Dolly Donuts
- 49 Costa
- 50 Havet
- 51 Caffè Cinos
- 52 Good Food
- 53 Sparrow
- 54 Lewisham Heights
- 55 The Greyhound
- 56 Homestead Cafe
- 57 Lagos Bar
- 58 Luciano's
- 59 Greggs
- 60 La Pizzeria Italiana
- 61 Cafe Treat Bromley

* Locations not mapped due to not having correct postcode:

Food Bank (2%)

Uncertain locations (9%)

Sports and exercise facilities**

- 62 Downham Leisure Centre
- 63 Bellingham Leisure and Lifestyle Centre

** Locations not mapped due to not having correct postcode:

Uncertain locations (25%)

Some residents also spoke about the benefits of building a tighter community that brings residents, businesses and community organisations closer together. They described the positive impact this could have on health and wellbeing by strengthening social networks, increasing access to peer support, access to information, and sense of control.

"[Community groups and businesses and the residents themselves] are not working together here. I think there might be the lack of perhaps...time and skills? Or willingness to do it. And I think to be honest with you, the residents themselves might not have an interest or sensibility. I think people have really hard lives, it's a deprived area. Many people here. They might be working antisocial hours, have children, are single parents, or have health issues. Whatever it is. And they're just not able to participate because they have too much on their minds, especially now with the cost of living crisis, the last thing they're going to be worried about is a community project when they need to think about what to eat today.

Walking interview, June 2022

2.3 Local concerns and barriers

An important local concern is about affordability. People interviewed said that local amenities and events need to be low-cost and, ideally, free for those who cannot afford to pay. Amenities and events need to be accessible to people with different needs, including people with reduced mobility, people who have to work or who need on-site childcare provision.

Littering, fly-tipping, and maintenance of green spaces and parks were also mentioned. Residents also spoke about the negative impact of car use and the need for a better cycling routes that would increase connections within the community and help people be more active.

There's a lot of litter. Just the attitude I think of shoving litter into people's hedges on the way down the road. I've found multiple articles in my hedge, a random shoe [...]. We need to group together a lot more to know how it is affecting each other. If we all knew each other a bit more we'd feel a lot more ashamed about messing up those people's areas, even if it's far from your own house.

Walking interview, June 2022

Car dominance and poor cycling infrastructure are local challenges



A significant challenge experienced by local people is knowing what is available locally. Access to regular information was highlighted as a key barrier to people making use of local facilities more widely.

Downham residents wondered who should be responsible for making sure that people have access to this information, and some suggested that local GPs could take on a bigger role in providing it.

"[Knowing] what's available [is needed]. People come in and don't even know we're here. People don't know what their options are. How do we communicate that? Do we flyer, is it Facebook? [...] people don't go to noticeboards anymore. This Corbett Community library is incredible for letting people know what's going on."

Walking interview, June 2022

Maintenance of overgrown green spaces is a local concern



Perceptions of local safety were mixed. About half of those we spoke with described the area as feeling generally safe. Other people talked about avoiding certain areas; some said they did not go out in the evening (especially older people). We also spoke to people who described having been the victim of a crime or have seen antisocial behaviour.

I would not walk down the woodland walk of a late evening. [...] Just because I've witnessed some activity that I wasn't sure about...people standing and waiting and having covert conversations and parting ways quickly. Honestly, I am guessing that there was some kind of drug deal going on. And it's a real shame because that is a lovely little area to walk through. But that is the only time I've felt insecure.

Walking interview, June 2022

Locals seemed to agree that better maintenance and security measures, such as quick responses to fly-tipping or better street lighting, would improve safety in the area.

2.4 Supporting health and wellbeing in the future

Downham residents would like to see better amenities in parks such as toilets, outdoor gym equipment and water fountains, and more community events.

The majority of people interviewed pointed out that there was not enough investment in provision for children and young people. Toddler paddling pools, playgrounds and hanging bars were given as examples of what is needed.

Thinking about how accessible things are is important. [...] Yoga, tai chi, sitting pilates for older people who struggle with mobility and feel they can't exercise. What else...evenings are great. But you also need the childcare if you're a parent. There's a creche but you have to pay for it and it's only open until a certain time. I think practical classes, macrame, crafts. [...] It doesn't have to be every week, but doing a couple of classes so people get started on that journey. Building that community. [There's] a high percentage of mental health issues. Those people are mainly helped by getting outside, into the community. Those things are important to invest in.

Walking interview, June 2022

The need for more community activities and venues was also highlighted by the research. There was agreement that certain groups are particularly underserved at the moment, including children, young people, older people, and vulnerable groups, especially those experiencing mental health challenges.

Service delivery and community outreach was another important issue brought up by residents. The in-depth interviews highlighted that people living in Downham would like to see more local people in charge of delivering activities and running activities or events. Shared lived experience and trusting relationships between service providers and users were singled out as important things to consider when allocating funds to local providers.

The outreach isn't right. A lot of the things are run by professional people that...a lot of them don't have the experience that the rest of us have. Or if they do, they keep it quiet. So, people don't want to ask them because they think 'you have no idea what I'm going through'. Whereas when you see people in the community setting these things up, a lot of people have already been through it and they know what they're talking about. They're not going in blind, they've had depression, had anxiety. If you're going to do stuff like that it needs to be either community-led or community-led with the support of other people. It's the community that will connect with the community. Not outside people, especially here. I've lived here my whole life; you're not going to talk to someone from another area if you can get help on your doorstep. People here are like a big family. They can help you more than anyone from another area.

Walking interview, May 2022

3 Recommendations

The research provides nuanced insight into a range of factors that impact on health and wellbeing in and around Downham, highlighting local barriers and also the valuable assets that support individuals and communities. A set of recommendations emerged from the barriers identified by this community research. These recommendations are aimed at the council and other large agencies active within the community.

1. **Invest in community research approaches** that build on the expertise of local people, help them develop skills, work with them to become more aware of and involved in local initiatives, and that help preserve the legacy of research in the local community⁴.
2. **Recognise the value of existing local partnerships** and allocate the time and resources needed to involve them in place-based decision making related to research, planning or investment locally.
3. **Fund community-based activities and events** that are tailored to different groups of people and needs.
4. **Increase provision of amenities in parks and playgrounds** for young children and older people.
5. **Subsidise community amenities and activities** to ensure that they are accessible to people on a low income.
6. **Create and support a community-based role** to provide information about local activities and events. This should use a range of methods, including leafleting to bridge the digital and data divides.
7. **Raise awareness of what social prescribing is** and how it could benefit people living in Downham.
8. **Streamline social prescribing funding** to ensure that existing assets (clubs, community-based groups and organisations) can apply for it, as they are already embedded in the community.
9. **Increase funding for street cleanliness and public space maintenance in the local area** to tackle fly-tipping, litter and general upkeep of parks. Help individuals who struggle to maintain their own green spaces, including older people and people with reduced mobility who cannot take care of their gardens.

⁴ This type of participatory work builds on the models of empowerment developed by Paolo Friere, Amílcar Cabral and Augusto Boal. Other useful resources are found in the work of sociologists and anthropologists on transformative research (Mertens, 2009), research justice (Jolivet, 2015), and engaged inquiry (Kuntz, 2015). Freire, P. (2020). *Pedagogy of the oppressed*. In *Toward a Sociology of Education* (pp. 374-386). Routledge; Jolivet, A. (Ed.). (2015). *Research justice: Methodologies for social change*. Bristol: Policy Press; Kuntz, A. M. (2015). *The responsible methodologist: Inquiry, truth-telling, and social justice*. New York: Routledge; Mertens, D. M. (2008). *Transformative research and evaluation*. London: Guilford Press.

Social Life was created by the Young Foundation in 2012, to become a specialist centre of research and innovation about the social life of communities. All our work is about the relationship between people and the places they live and understanding how change, through regeneration, new development or small improvements to public spaces, affects the social fabric, opportunities and wellbeing of local areas. We work in the UK and internationally.

www.social-life.co @SL_Cities

Downham Dividend Society Community Land Trust was founded to continue the wider regeneration work of Fusions Jameen's Black-led community self-build schemes. It considers the Downham community as an asset and its social bonds of economic value. It promotes a community wealth building approach which seeks to maximise community-led regeneration strategies to tackle the intergenerational poverty and health inequalities which impact Downham.

<https://www.facebook.com/downhamhealththroughsport/>
<https://www.facebook.com/greenwomanoasisproject/>

Sevenfields Primary Care Network (PCN) is a group of six local General Practices working together to improve health and wellbeing for our patients. As well as providing the best medical care we can we aim to encourage health promotion and work with our community, the council and voluntary sector to establish and promote activities that themselves improve health hence commissioning this important report and installing four outdoor gyms in our local parks and greens.

<https://www.sevenfieldspcn.nhs.uk>

Report commissioned by Sevenfields Primary Care Network.



Class walls

Gated communities may be growing in number but they are nothing new, as Michael Nelson knows from personal experience.

Recently I investigated the site of the 'class wall' that stood near the house where I lived as a child. In 1926 residents of Alexandra Crescent, a private road in Bromley, Kent, about a third of a mile from my family's house, built a seven-foot wall, capped with broken glass, across the road. The wall was constructed to stop the working classes from the Downham estate, like our family, entering the streets of the adjoining middle-class estate. The Downham estate had been built by the London County Council (LCC) to house people displaced by the slum clearances in the East End of London. That prewar class wall brought to mind the striking rise in gated communities, barrier-walls and the adoption of private security for affluent communities.

On February 16th, 1926 Albert Frampton, the developer of Alexander Crescent, applied to Bromley Council to erect the wall. The application was the result of pressure exerted by residents on Frampton's estate, who objected to 'vulgar people' using their road as a short cut to Bromley town centre. The council declined to take a decision, but the wall went up anyway. Later there seems to have been some confusion about responsibilities because the LCC made its objections to the wall known to Lewisham Council, who decided it was not in a position to remove it.

Disputes about the Downham wall raged for nearly a quarter of a century and it was not taken down, by Bromley Council, until 1950.

In 2009 an old Downham resident recalled on a local history website: 'My Gran was taken ill on a visit and my father had to climb the wall to get to the doctor, Dr Bellingham, who lived in Alexander Crescent. Needless to say, he cut his hand.'

I recalled from my time as an undergraduate at Oxford University that two similar class walls were built in 1934 in Oxford between the council housing estate at Cutteslowe and the middle-class Urban Housing estate. These walls were over seven feet high and topped with spikes rather than glass. In 1936 Abe Lazarus, a Communist politician,



and his supporters marched on the walls with pickaxes. The police barred their way and the attempt to dismantle them failed. The Oxford city authorities eventually demolished the wall with steamrollers in a secret night-time operation on June 7th, 1938, their powers derived from the Private Streets Act of 1892. The Urban Housing Company sued the city council and a judge severely criticised the council, forcing it to re-erect the barrier.

In 1953 councils were given powers of compulsory purchase and Oxford City Council bought the strips of land on which the walls stood. They were finally taken down on March 9th, 1959. On March 9th, 2006 a blue plaque commemorating the destruction of the hated walls was unveiled on a former council house near where a part of the wall once stood.

Gated communities are not new. Loudwater on the fringes of Rickmansworth, Hertfordshire, St George's Hill in Weybridge and Burwood Park in Walton-on-Thames (both in Surrey) have existed for up to a century. The walls separating Catholic and Protestant communities in Northern Ireland have increased since the ceasefire. But at the turn of this century the Labour government was so concerned about the social implications of the growth in gated communities that the office of the deputy prime minister, John Prescott, commissioned a study into them from Glasgow University, which appeared in 2003. It found that there were 1,000 such gated communities in England and 50 more in the pipeline.

Gated communities have implications for the raising of local taxes. In

The wall across Valeswood Road at its junction with Alexandra Crescent prevented 'vulgar' people from the Downham estate using it as a shortcut to Bromley town centre.

recent court cases in the US several groups of residents in gated communities have challenged their obligations to pay local taxes. There is now a growth in private security patrols in affluent streets in London. It can cost a participating resident £2,000 a year. The patrols are addressed more to stopping muggings than burglary. Will members of gated communities begin to object to paying for the police? Gated communities, it seems, were not conducive then and are not conducive now to a 'Big Society'.

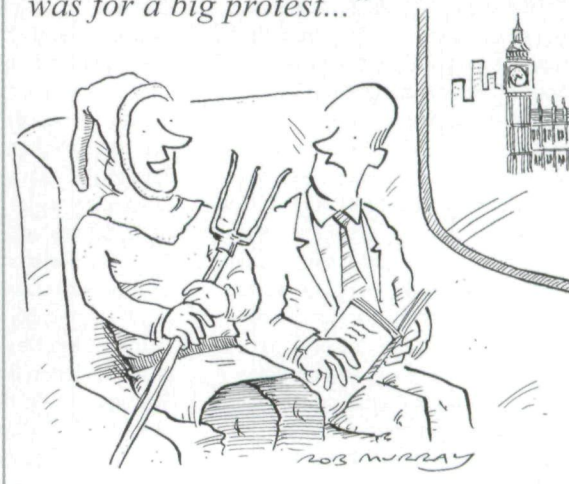
Michael Nelson's memoir, *Castro and Stockmaster: A Life in Reuters*, will be published by Matador in December.

For further articles on this subject, visit: www.historytoday.com/social-classes

Alternative Histories

by Rob Murray

"My last trip up to London was for a big protest..."



Copyright of History Today is the property of History Today Ltd. and its content may not be copied or emailed to multiple sites or posted to a listserv without the copyright holder's express written permission. However, users may print, download, or email articles for individual use.

Email from Jaki Rance

I wholly reject the plan to demolish the Albany and build on its green spaces.

I am concerned that the current artistic director of the Albany hopes to benefit personally from the development.

Where will the people of Deptford be able to make a noise if every inch of land is a residential development.

The best outcome for the creative of Lewisham is a new management at the Albany, who don't turn a deaf ear to the needs of the community.

Yours sincerely,

Jaki Rance

Redacted

Email from Jane Ford

hi,

I am writing to comment on Lewisham's local plan.

The value of mature trees is being underestimated. The benefits to residents of all ages is substantial. With increasing heat waves, it is more difficult for younger trees to get established. Designing around existing trees would allow future generations to enjoy them.

The potential for net loss of green space is a concern as densification becomes the focus of development. Green spaces are needed for people's physical and mental health and they must be protected. During the pandemic, the value of these spaces was very clear and it is sad to see them being eroded. Lewisham's provision of green space per person is poor and parks are especially important for those without a garden. Prioritising parks sends the right message about these essential community assets, which suffer from under-investment.

Provision for quality street level amenities is important and can be easily forgotten. The experience of pedestrians at ground level is a key part of planning and provision should be made to protect and create pleasant spaces. Some focus and thoughtful design can transform the feel of an area for pedestrians. Otherwise developers are able to create grey, desolate wind tunnels without challenge. Simply adding a retail unit at the base of a tower block is insufficient. Lewisham needs to be more aspirational about the public realm, rather than it being an after thought.

There are plenty of examples where urban space has been designed well, and it is unclear what Lewisham is trying to emulate with this plan.

Kind regards,

Jane Ford

Redacted

Email from Jonathan Mann

Redacted

I write to express concerns regarding the draft Lewisham Local Plan and specifically the Bell Green and Stanton Square areas, which are local to me.

Section QD4 proposes a 16 storey limit around Bell Green and a 12 storey limit around Stanton Square (Figure 5.9). These heights are excessive, and the supporting evidence base is flawed, because it relies on incorrect assumptions in the evidence base. There is no confirmation that the Bakerloo Line will extend within the life of the Local Plan, and there is not yet a masterplan for this area, but the evidence base relies on both to form guidance on the height limit. The heights proposed are unsound and should be reviewed.

With regards to building heights generally (not just the areas mentioned above, the area around Lower Sydenham and in fact all areas set out under QD4), Lewisham Council has declared a Climate Emergency (2019) and has set out ambitions to be carbon neutral by 2030. New development zones should therefore, I would argue, be set constraints that drive low carbon development; the market will tend to build out the full possible extent of a site, so it is crucial that planning steers decisions towards sustainable outcomes. A limit of say 6-10 storeys would promote raft foundations rather than piling, and limit the stiffening required in the structural frame generally, greatly reducing the quantity of embodied carbon within each building. Lowering height limits further, to

11-18m, would promote the use of timber construction, rather than concrete. Can the height limits, or the associated wording, be changed to genuinely drive sustainable urbanism?

Kind regards,

Jonathan Mann

Redacted

Email from Kate Richardson

Please see my comments on the proposed changes re regulation 19 specifically on the A21 corridor and the Ravensbourne retail Park

Re Regulation 19 Comments

I am addressing my comments on the proposed development around the A21 corridor and the Ravensbourne Retail Park taken from the document

It is good to see there is an emphasis in the Development requirements that it needs to be designed to improve the ecological quality, carbon storage, flood storage and public amenity value of the River Ravensbourne, and seek to re-naturalise the river where feasible, taking into account the River Corridor Improvement Plan SPD. There are still concerns over flood management (see later comment)

The A21 corridor is a key route that effects residents in the CGRA of which I am a member Concern has been expressed about the height of buildings proposed along the corridor especially when it comes to the proposed development in the retail park. At present it is low rise and the retail offered there is popular and well used. This is reflected in the growing amount of usage in the retail park Something that was not seen pre pandemic

The Proposal for the retail park is to have 367 residential units. This is very intensive and is not clear whether important social infrastructure will be part of the plan, or indeed whether the general service infrastructure will cope. The area already has a chronic shortage of doctor's surgeries and young persons' facilities (youth clubs etc) If you are building for the

future, it is important that these are built in . Could the plan not firm up on this? This was previously pointed out by residents in the prior consultation. As mentioned in the document it is close to the conservation area which is Edwardian in nature and low rise. It is important that any new building development does not detract from the Conservation area at present density appears to be the overriding consideration, which is a little worrying especially without firm infrastructures in place.

In Development requirements the plan states

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.

The plan does not commit to an upper limit and there is unease as to what height these taller elements would be. Anything over 9 storeys would be unacceptable.

The plan proposes in the Development guidelines

. 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

It would have been helpful to see how this is going to be achieved. At present it is quite a busy junction with the traffic police using it

Whilst the document states that

Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network.

However, given the amount of press coverage on sewerage discharge would it not be better for the future to ensure this is managed in a way that is future proofed and for the plan to state this? The area is prone to flooding, drains already fill up quickly and large puddles of water already occur after heavy rain

Finally on a note on the submission document itself which I gave up on the first hurdle! Hence the email submission .You do need to have a planning degree to get through that! It is dense incomprehensible and not user friendly. If you want to engage with residents this is not the way to do it.

Email from Kevin Connell

Can you explain what Regulation 19 is in simple terms (prior explanations made zero sense in layman's terms) and what disadvantages will arise to use residents if the council gets this through like those LTN schemes restricting our freedom? Appreciate an honest explanation of what is trying to get passed here and what it means.

Many many thanks.

Email from: xxxxxxxxxx

Subject: Lewisham local plan - consultation comments

Dear all,

I wish to make comments on the Lewisham local plan. I live at

Redacted.

I have read the proposed site allocations for the redevelopment of the following sites in the West Area: 4, 5, 6, 7, 9, 10, 11, 12.

I strongly endorse all these proposals listed above. We strongly need additional housing supply, including for private sale and including for small families (ie 1-2 bedroom). This is the only way to alleviate pressure across the entire housing ecosystem. It is not acceptable for these sites to remain empty or heavily underutilised as eg locked yards, particularly given their close proximity to the overground network. I would strongly welcome their development in the near future. My only additional comment is that the council should be more ambitious in bringing these sites on-stream on a shorter timescale than the 10+ years envisaged.

Best wishes

Email from: Nicholas Blythe

Subject: Local Plan Regulation 19 Consultation

Dear Sirs,

We write to support the following Regulation 19 draft local plan policy:

Section EC5 (d) states:

1. The reconfiguration of the Surrey Canal Road SIL is facilitated through the Local Plan. Land at the Bermondsey Dive-Under is designated SIL to provide substitute industrial capacity for the release of SIL at Apollo Business Centre, Trundleys Road and Evelyn Court. These sites released from SIL are re-designated as LSIS where the co-location of employment and other compatible uses will be supported in line with Policy EC6 (Locally Significant Industrial Sites) and relevant site allocation policies.

The proposed reconfiguration of these sites as LSIS (locally significant industrial sites), which allows inclusion of 'other compatible uses' (e.g. residential), responds both to satisfying housing need whilst retaining local employment opportunities, and by offering a more flexible approach to development makes it more likely that the land will be beneficially developed and by allowing an element of cross subsidy increases the likelihood of satisfying both the desired employment opportunities and housing need.

For the above reasons we support the above policy as sound.

Regards,

N. Blythe

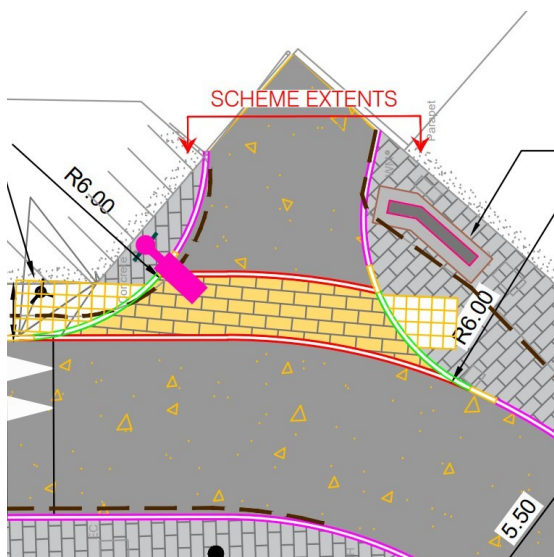
Creekside Planning Proposal – Objection.


To: Lewisham Planning Dept.

From: Paul Malone

Dated 17/04/2023

Reference and detail:



Title			
CONSULTATION PHASE 2 SHEET 5 OF 5			
Client			
LONDON BOROUGH OF LEWISHAM			
			
Crown House 2 - 8 Gloucester Road Redhill Surrey RH1 1FH t 01342 893800 f 03333 444 501 mail@watermangroup.com www.watermangroup.com			
Status			
PRELIMINARY			
Designed By	UF	Checked By	DG
Drawn By	UF	Date	FEB 2020
Project - Originator - Volume - Level - Type - Role - Number		Revision	
14728-126-WIE-ZZ-XX-DR-C-90045		P02	

My objection to this proposal is related specifically to the area adjacent to my studio (denoted by the text 'R6.00' on the left of the diagram) and in general to the reconfiguration of Creekside as it affects the operation of the studio block / gallery in which I have my art practice.

1) The extension of the pavement and positioning of a granite seating.

Because of the configuration of the Yard within the gates, vehicles have to reverse parallel to the existing kerb (black dotted lines). Often deliveries and pick-up from the studios are by large lorries (including articulated). The proposed configuration will severely restrict these movements.

The seating is not needed and will add to these problems. See the blue arrows for the access track, existing white dotted track lines and the green arrow showing a 40cms kerb *inside* the gate. The seating would restrict APT artists in the extension (welding shed) access along this pavement to the Yard for i.e. loading.

Redacted

2) Signage pollution.

The waymarking sign is not needed (most people have maps on phones) and is visually intrusive. The kerb has been extended just to accommodate the sign but then the presence of the sign undoes this benefit especially for wheelchair users and buggies.

3) Road table

As you can see on the map, my studio is right next to the gate and in a direct trajectory with the eastbound section of Creekside. After the existing road hump was installed (besides No2 Creekside) there have been 3 collisions between vehicles and my studio. The last time was with a heavy lorry which caused structural damage to the steel frame of the building. Thankfully no pedestrians were involved. What appears to be happening is that vehicles with suspension problems impact with the road hump, the wheel collapses into the wheel arch and, when it comes to turn the bend in the road it is not able to do so. This would be made worse by moving the ramp of the hump nearer to my studio and so giving drivers less time to respond. The current on-street parking arrangements restrict speed already without any cost to the ratepayer (see below).

4) Parking

Currently there is free on-street parking for about 20 vehicles in our vicinity. This is beneficial both for delivery / pickup and for visitors to the gallery and education events. The proposed scheme is for a severe restriction down to one loading bay and 3 disabled bays. This is not what was proposed in the original Plan which stated that there would be no change to the current parking quotas in Creekside. I would expect to see this implemented.

4 Sub-points

- i) Many of our artists and visitors are usually carrying heavy or bulky materials - i.e. photographic equipment, artworks, construction.
- ii) As we are seeing at the moment with the strikes, public transport can often be unreliable. This will only get worse as the economy deteriorates.
- iii) The Mayor speculated that traffic pollution kills 4000 Londoners a year. This has now been disproved.
- iv) Arrhenius' climate change theory was de-bunked in 1909 by the chemist Robert Wood. It was only resurrected in 1971 by the Club of Rome for globalist political purposes. It has no place as a determining factor in local planning issues.

5) The Function of Creekside

Creekside has often been called 'London's most creative street'. This has been due to the affordable and flexible nature of its properties and also its independently minded culture. Its origins are in productive industrial activity dating back to the 1500's ship building and continuing until the 1980's. Creative individuals in this area have regenerated the function of the street often at their own expense and hard work. This is what has given the street its own unique character. Andrew Carmichael – one of APTs founders - once said in the 1990's that Creekside "Could be a creative powerhouse... or it could be a dormitory". The 'look' being proposed here is best described as 'corporate vernacular', perhaps one of the more unfortunate aspects of our time.

Paul Malone 17/04/2023

From: Richard Senior [REDACTED]
Sent: 02 April 2023 17:00
To: LocalPlan
Cc: Warner, Cllr Luke; De Ryk, Cllr Amanda; Campbell, Cllr Juliet
Subject: Lewisham Local Plan: Commets from a resident

A lot of work has obviously gone into this, but it is hard for me to comment:

- There is a vast number of documents, and even if I narrow it down to the ones which concern me more than others it would take a huge amount of time to analyse properly - time I do not have.
- At the time of writing, there are comments on only 5 of the 19 "proposals", and these comments add up to a grand total of 11. That is no surprise. John Montagu wrote: "If any man will draw up his case, and put his name at the foot of the first page, I will give him an immediate reply. Where he compels me to turn over the sheet, he must wait my leisure."
- There are some weird questions such as whether things are 'legally compliant'. Compliant with what? In any event, I am not any sort of lawyer, so how could I know the answer to this?
- The language used is stilted and likely to alienate some people. A random example: "The successful delivery of the spatial strategy

will require that new developments optimise the capacity of sites". Is this trying to say that new building should make best use of space? This sort of pompous prose is not good. Or how about "Development proposals must demonstrate an understanding of the site context". One of my teachers taught that, if the opposite of a statement makes no sense, the statement itself is fatuous and of no value. The opposite here is; "Development proposals must NOT demonstrate an understanding of the site context". Go figure, as our US cousins say.

It is obvious that a lot of people have done considerable work on this, but if you really want comments from local citizens, you have to make it simpler and clearer.

Richard Senior

From: annabel mclaren [REDACTED]
Sent: 25 April 2023 12:23
To: LocalPlan
Cc: Best, Cllr Chris; Curran, Cllr Liam; Lavery, Cllr Jack
Subject: Sydenham Society's comments

RE the Key Spatial Objectives for Lewisham's South Area (p640):

The Sydenham Society supports the objective of making the Bell Green and Lower Sydenham area a London Plan Opportunity area in a future update of the London Plan. However we would also like to see an emphasis on Bell Green/Lower Sydenham becoming a 'Cultural Quarter' as in Forest Hill. The Livesey Hall has long been a venue for music, dance and theatre and in recent years has hosted a number of events staged during the Sydenham Arts Festival (notably Spontaneous Productions' *When The Boys Come Home* - tracing the lives of those gasworkers who saw active service in the First World War and *The Colours of India* - an evening of Indian classical music and dance).

Whirled Art Studios have recently taken space at 500-505 Southend Lane SE26 5BL, and the arts organisation V22 run Sydenham Community Library where they rent out space for studios. In discussions about the future of Sydenham Library they have said that they could let out more studio space if they could obtain it. In addition My Aerial Home is based at Unit 2 on the Bell Green Retail Park where, in addition to providing classes teaching circus skills, artists are also based - they've expressed a wish to take part in the 2023 Sydenham Artists Trail.

In the view of the Sydenham Society, the designation of Bell Green and Lower Sydenham as a Cultural Quarter would increase employment opportunities in the area. The need for more studio space is evidenced by the existing demand in Forest Hill and Stansted Road.

p 802, Table 21.1 LEWISHAM LOCAL VIEWS

The view from Sydenham Hill Ridge towards the City of London is missing from the tables of London Strategic Views and Lewisham Local Landmarks. This view is as important as the Horniman Gardens view and should be reinstated

p 803, Table 21.2 CONSERVATION AREAS

Sydenham Thorpes is missing from the schedule of Conservation Areas, as is the Thorpes Extension which takes in the commercial terraces of Sydenham Road and was designated in 2007.

p 805, AREAS OF SPECIAL LOCAL CHARACTER

Longton Avenue and Lawrie Park are missing from the schedule of Areas of Special Local Character

p 832 TALL BUILDINGS SUITABILITY ZONES

The Sydenham Society disagrees with the maximum heights of buildings at the southern corner of the Bell Green gasworks site being set at 16 storeys; similarly the

Worsley Bridge Road site at 12 storeys. These heights bear no relationship to their surroundings which, in the case of Bell Green, consist of Edwardian and inter-war terraces rarely exceeding two storeys (eg the streets leading off Perry Hill to the south and east).

Kind regards,

Annabel McLaren
Sydenham Society



Visit www.sydenhamsociety.com
for news & events in SE26

Email From Alex Taylor

Good Evening,

I wish to express my objection to the current Lewisham Local Plan with specific reference to Bell Green.

There is various reference to the Bell Green Masterplan, with recommendations that developers should be led by this proposal. However this Masterplan appears brief at best and wholly inadequate to provide objective guidance and reference to developers. Moreover, consultation with local residents has been nonexistent. As a local resident, I have spoken to many neighbours and they are equally perplexed by a Masterplan which we have not been consulted on in anyway. Therefore, how Lewisham can make any claim that it will serve local residents, without consulting any such residents is at best incompetent.

A similar view I take with regards to the Tall Building addendum report. It is clear that Lewisham has given no consideration to the general area in a wider context. The areas designated are located incredibly close to and will be overbearing to the traditional terrace housing which is extensively found to all sides of the site, particularly the north and west. The only other areas where buildings of this height can be found are in central Bromley and Lewisham. How similar building heights can be deemed appropriate for the Bell Green area given the wider context of housing, is inexplicable and completely unjustified.

The local residents have lost such trust with Lewisham and this is yet another example of Bell Green residents being faced with a constant onslaught of excessive proposals with no reasonable or well communicated community engagement, which results in a damning verdict on the manner in which Lewisham run local council and care for their community.

I look forward and would welcome further proposals for engagement with local residents before making any further proposals with regards to Bell Green.

Regards

Alex Taylor

Email from Anna Stern

Dear Sirs,

I am a resident of Perry Hill, SE6 4HE, this is my response to the r19 consultation on the draft Lewisham Local Plan.

yours faithfully,

Anna Stern

Response to Policy LSA1: South Area place principle.

This policy is not sound in relation to policy LSA1a, which cites the Open Lewisham strategic objective (OL1), in the absence of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve. The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to start this as soon as possible. We are told that the neighbourhood will be 'focused around a new local centre', but without a masterplan, we don't know where the focal point will be. Deciding on the eventual position of the new station and bus interchange would allow the central area to be planned around it.

Good growth opportunities for Bell Green are blocked by waiting for the Bakerloo Line. For decades, this has delayed any decision on relocating the current station which is isolated, connecting with only one bus, from Bell Green to Bromley. The Bakerloo extension 2 is unlikely to happen within the lifespan of this Local Plan, and alternative strategies exist to enable positive development. If the current station was moved, it would

immediately improve PTAL rating, even if it weren't possible to convert the line for underground or overground services.

None of the active travel connectivity can be delivered in the absence of a Bell Green Masterplan, as developers cannot deliver any such connectivity on a single plot. Once the desired routes are set out in the Masterplan, developers have something to work on. (Policy LSA I) Sydenham Green Health Centre (SA5) is already grossly overstretched due to new housing developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. This is classed as urgent, but has not been actioned, and there is no evidence of any plans in place. Any new developments will overwhelm the Health Centre's capacity, so this vital infrastructure needs expanding whether the N4 hub project is confirmed or not. This should be included in the Bell Green Masterplan.

Response to Policy LSA2 South Area place principle.

This policy is not sound in relation to policy LSA2b, due to the lack of a Bell Green Masterplan, robust data about the existing and projected future capacity needed in social infrastructure, and other vital supporting evidence. The lack of these guidelines makes the policy ineffective in what it sets out to achieve. The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to get started without delay.

Significant transport accessibility improvements, active travel routes, and the transformation of the retail park into a new mixed-use neighbourhood cannot happen without a masterplan (LSA2b). Waiting for the Bakerloo

campaign is delaying good growth in Bell Green. Move the station, and either the mainline service or Overground would improve connectivity and accessibility. It could be used by the Bakerloo line when that arrives. Whatever the future of the line, the new station is vital. This needs to be specified in the proposed Bell Green Masterplan.

Bell Green is proposed as a regeneration node, in a Strategic Area for Regeneration. However, its proposed status has been downgraded from a proposed new Town Centre to a Local Centre. * The sites' indicative growth potential is shown for a town centre. The scope of brownfield development at Bell Green will create far more than a small cluster of shops for convenience retail, and a community anchor. It has far more than that already. The LLP seems conflicted about Bell Green's future, and it needs to be clarified before the GLA will consider designating it as an Opportunity Area.

*"Commented [NE791]: Latest Retail Impact Assessment and Town Centre Trends Study indicates scope for Local Centre is appropriate – this is reflected in amended policy point C.c above."

Response to Policy LSA3 Bell Green and Lower Sydenham

This policy is not sound in relation to Policy LSA3c, due to the lack of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve.

We need a Masterplan before the GLA will even consider designating Bell Green as an Opportunity Area. (LSA3 A). Lewisham has not started on a Masterplan (LSA3 B), despite having rejected the designation of a community Neighbourhood Forum that wished to create one. The aspiring Bell Green Neighbourhood Forum, refused designation by Lewisham, started work in 2019, and has had an extraordinarily hostile

response from Lewisham, who have refused to have any discussions with us. We have a membership of 80, and despite an overwhelmingly positive local consultation response, Lewisham rejected our Area boundary, and so our Forum. They have since also refused to recognise us as an amenity society, having changed their definition of such groups to being based on the boundary of a single conservation area. This gives us little confidence in the delivery of such consultation.

The missing Masterplan undermines the aspirations expressed in Policy LSA3c; redevelopment of SA1, the Livesey Memorial Hall and gasworks site, is already underway in the planning process; local residents' aspirations for the Masterplan, such as a reconfiguration of the roads and pedestrian access (LSA3 Ce) are being blocked. LSA3 Cg: infrastructure. Provision of sports facilities is of huge concern, given the closure of the Bridge Leisure Centre, and the imminent threat to the sports grounds at the Livesey Memorial Hall (SA1). Sport England, in their r18 response, stress the absence of a robust database. They say that this should include a revised Playing Pitch Strategy, and the Physical Activity and Healthy Lifestyles Strategy. Neither of these documents are published, and the current documents state that the Bridge as a functioning sports hall with swimming pools. We cannot assess Bell Green's sports provision need for new developments without a robust database; this information should have been included for the consultation process. An officer's report made in April 2023 says that '3.1. We are in the process of arranging a steering group meeting to ensure the PPS is still fit for purpose/relevant. This is in relation to changes in the way sport and physical activity are viewed post pandemic.' The Local Plan has been progressed before the necessary documents have been gathered.

Sydenham Green Health Centre (SA5) is another piece of community infrastructure already grossly overstretched by recent residential developments. It is proposed to be upgraded for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. Classed as urgent, but has not been actioned, despite being oversubscribed, and incapable of serving the impending new housing developments.

Currently there are extreme problems with the electricity grid at Bell Green retail park, with units powered entirely by diesel generators. There are frequent power cuts at the supermarkets, shutting off the fridges and freezers. Existing landowners and developers must cooperate to address the problem in advance of development.

Policy LSA3 Dd urges developers to respond positively to heritage assets and their setting, including the Livesey Hall War Memorial and gardens. This should read the (grade II listed) Livesey Memorial Hall, the Livesey Hall War Memorial, the Livesey Hall's Front Wall, and sportsgrounds. NOT gardens. This aspiration is being undermined by the lack of a Masterplan, which is allowing developers to push for tall buildings in close proximity with the Hall, threatening its viability as our Asset of Community Value. It is also undermining the Agent of Change protection of this important community hall, whose existing use of music, live performance and events for the local community is to be undermined by intensive residential development in close proximity. This will lead to conflict between the existing use and the new residents' quality of life.

Site Allocations

SA1: Former Bell Green Gas Holders and Livesey Memorial Hall

SA1's boundary is problematic; two interlocking sites with separate landowners, both currently in the planning system (Apex and Barratt London), plus a third landowner (SGN), currently withholding its land

from development. This site allocation policy is not sound, as the omission of the gas pressure station prevents the creation of a coherent street pattern.

The southeast corner is designated as an Appropriate Location For Tall Buildings, despite its proximity to the listed structures of the Livesey Memorial Hall, the most sensitive and heritage-rich section of Bell Green. This proposed designation derives from the site-ownership-based boundaries shown at r18. The poor-quality mapping provided for the Tall Buildings zones, shown in opaque orange, obscured this block's isolation from the rest of the Tall Building zone by the Spine Road, which is a public highway, and a major access road. The relevant section of public highway is included in the r19 site boundary, though it cannot be developed. This isolated block has been overlooked by all but the most intense scrutiny.

SGN provided Lewisham with a plan, offering their gas pressure station area for development, yet their current public stance is that this area cannot be developed for safety reasons. This causes huge difficulties for the adjoining developments, as cooperation between developers to create a coherent streetscape is non-existent. This piecemeal approach won't build a positive community.

The Apex (Livesey Memorial Hall) site includes a strip of land adjoining the 'British Gas Exclusion Zone' SINC extension, which was assessed as being identical habitat to the SINC and designated in the Parks and Open Spaces strategy 2020-2025 (2020) as natural greenspace (not publicly accessible). Allowing Apex to redevelop this precious natural habitat within a toxic, barren landscape seems inexplicable. The site gradients make the proposed green pathway impossible. The SINC sites were assessed in 2016 and have not been reviewed since. Even in 2016, no site visit was made, and it may have been classified by satellite

photography. The report states: "Access to privately-owned sites was not always possible. This was due to a number of reasons including: Dense vegetation next to waterbodies at River Ravensbourneand Pool River Linear Park; combination of field survey, aerial photography and professional judgement was used to determine what habitats are likely to be present in areas not accessible by foot. However, in most cases surveying was possible from publicly accessible vantage points (such as from bridges or adjacent roads or open space." (p.38). Given that best practice is that environmental surveys should be renewed after c. 2 years, the status of the SINC extension, or at least the natural greenspace within the Apex site should be reviewed.

Agent of Change. Policy QD7 Cd. of the LLP says that new noise-sensitive development is situated away from existing noise-generating uses and activities, or, where this is not possible, providing adequate separation and acoustic design measures. The Livesey is a community hall whose existing uses include live performance, music, and events, which generates a great deal of noise. This is not a problem currently, and the arrival of housing close by will create a great deal of ongoing friction. The site boundary doesn't include the necessary no-build zone to protect the existing use of the Livesey.

Agent of Change Policy QD7 Cf. says that development must not prejudice the use of playing fields. The Bowls Green of the Livesey Memorial Hall is currently used as an exercise area for the boxing club, including the youth provision of Knives Down, Gloves Up sessions. It has also been used by Brent Knoll school, a nearby special school with very little outside space, none of which is green. Both these schemes, along with other activities for children and young people, will be threatened by child protection concerns with overlooking from housing blocks.

Conclusion:

In order to make this site allocation sound, its Tall Buildings suitability zone needs reviewing, and robust justification given for its designation. There needs to be clarity over the SGN pressure station's future. It must be included in the design for the site layout, so a coherent street layout can be made. There needs to be a fresh assessment of the British Gas Site Buffer Zone greenspace, and of the greenspace within SA1, omitted from the SINC. The Agent of change aspects of redevelopment must be assessed thoroughly and included in the proposed Bell Green Masterplan.

SA3: Sainsbury's Bell Green

The proposed Bell Green Masterplan is needed to address the pedestrian safety issues of traffic bypassing the gyratory system, running through Sainsbury's carpark. Improvements in connectivity need to be made immediately to pedestrian access routes, which are currently being poorly served.

SA4: Stanton Square Locally Significant Industrial Site

SA4: This site allocation policy is not sound, as its boundary has not been justified robustly. It includes the local heritage asset of the Old Bathhouse, next to the Bell public house. This is a heritage asset which deserves local listing. Built as public slipper baths by Lewisham Council in the end of the 19th century, it survives with much of its interior intact. It is unthinkable that this should be redeveloped, and no justification is given for its inclusion. There is also no acknowledgement in this allocation of the extent of contamination of the Coventry Scaffolding site, and the wider area from the original gasworks, dating from c. 1850. The safety practices at this date were considerably worse than later, and it continued in gasworks use for many decades.

SA5: Sydenham Green Group Practice

Sydenham Green Health Centre (SA5) is already grossly overstretched due to new developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. Classed as urgent, but not actioned, despite being oversubscribed, and the impending housing developments. [Infrastructure Delivery plan].

SA8: Land at Pool Court

Policy SA8 is unsound, as it is ineffective in what it sets out to achieve. The site is unsuitable, being unfit for human habitation due to high risk of regular flooding at the confluence of two rivers. The quality of life is further degraded by being closely bordered by two railway lines. This site allocation fails to address Lewisham's duty to provide a travellers site; what is needed is rather a stopping site. Travellers have crossed the area for at least four hundred years, still do so several times a year, and need somewhere to stop enroute. A tiny residential site doesn't address this need.

EC18 Culture, creative industries and the night-time economy

The Bell Green Neighbourhood Group supports the application being made for a Bell Green Cultural Quarter. The Livesey Memorial Hall has a proud history of live performance, music, and community events, along with art exhibitions and cultural activities. Sydenham Library hosts art studios, exhibitions, and workshops. It is the base for Spontaneous Productions shows being shown in Home Park, next door. Whirled Art Studios has set up a complex of studios on Stanton Island, which were rented out immediately. My Aerial Home is a distinguished studio and school for aerial circus disciplines, based on the Trade City retail park, and Glenlyn Academy is a dance and performance school based on the Home Park Estate. Given the EC18 policy for growing the creative

industries as a source of employment in Lewisham, further studios would be a positive use of the heavily contaminated land of the Coventry Scaffolding yard. Site of the earliest phase of the Bell Green gasworks, the contamination is likely to be very bad, and would be prohibitively expensive to remediate it to the level acceptable for residential use.

Schedule 1.

Table 21.1 Livesey Memorial Hall should be added to the list of Local Landmarks.

Schedule 2.

Table 21.2 Missing from Conservation Area list - The Thorpes

Conservation Area.

Table 21.2 London Squares – Taymount Rise is missing from the list. Fambridge close is NOT the substitute for the designated Stanton Square. Stanton Square was redeveloped without substitution, and restitution attempts are in process.

Schedule 5

Table 21.5 No mention of any retail existing at Bell Green, or on Perry Hill/Catford Hill.

Schedule 6

Table 21.6 Cultural Quarters. Please add Bell Green.

Schedule 11

Table 21.11 Growth corridor - Perry Hill- Catford Hill not listed but shown on Policies Map.

Conclusions on the LLP consultations for the attention of the Planning Inspector:

Consultation on the Lewisham Local Plan has been deeply flawed. Regulation 18 was conducted during the pandemic, with limited communication available. Anyone with difficulty accessing online material was excluded from involvement in the consultation. Regulation

19 consultation has taken place simultaneously with one on the Statement of Community Involvement, and constitutional changes to Lewisham Council's planning arrangements have already been approved by the full council, in advance of the SCI consultation's conclusions. Taking all of this into account, further formal consultation is needed to achieve a common understanding of all the plans and changes proposed. Therefore, the Bell Green Neighbourhood Group concludes that this consultation is not sound, as the draft Lewisham Local Plan is neither robustly justified nor evidence led. The lack of supporting evidence (including the Bell Green Masterplan, the Playing Pitch Strategy and the Physical Activity and Healthy Lifestyles Strategy) means that it cannot be effective in what it sets out to achieve.

Please find attached the Bell Green Neighbourhood Group's response to the r19 LLP consultation.

Julia Webb

Response to Policy LSA1: South Area place principle.

This policy is not sound in relation to policy LSA1a, which cites the Open Lewisham strategic objective (OL1), in the absence of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve.

The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to start this as soon as possible. We are told that the neighbourhood will be 'focused around a new local centre', but without a masterplan, we don't know where the focal point will be. Deciding on the eventual position of the new station and bus interchange would allow the central area to be planned around it.

Good growth opportunities for Bell Green are blocked by waiting for the Bakerloo Line. For decades, this has delayed any decision on relocating the current station which is isolated, connecting with only one bus, from Bell Green to Bromley. The Bakerloo extension 2 is unlikely to happen within the lifespan of this Local Plan, and alternative strategies exist to enable positive development. If the current station was moved, it would

immediately improve PTAL rating, even if it weren't possible to convert the line for underground or overground services.

None of the active travel connectivity can be delivered in the absence of a Bell Green Masterplan, as developers cannot deliver any such connectivity on a single plot. Once the desired routes are set out in the Masterplan, developers have something to work on. (Policy LSA 1)

Sydenham Green Health Centre (SA5) is already grossly overstretched due to new housing developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. This is classed as urgent, but has not been actioned, and there is no evidence of any plans in place. Any new developments will overwhelm the Health Centre's capacity, so this vital infrastructure needs expanding whether the N4 hub project is confirmed or not. This should be included in the Bell Green Masterplan.

Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Response to Policy LSA2 South Area place principle.

This policy is not sound in relation to policy LSA2b, due to the lack of a Bell Green Masterplan, robust data about the existing and projected future capacity needed in social infrastructure, and other vital supporting evidence. The lack of these guidelines makes the policy ineffective in what it sets out to achieve. The LLP says that developers must follow the Bell

Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to get started without delay.

Significant transport accessibility improvements, active travel routes, and the transformation of the retail park into a new mixed-use neighbourhood cannot happen without a masterplan (LSA2b). Waiting for the Bakerloo campaign is delaying good growth in Bell Green. Move the station, and either the mainline service or Overground would improve connectivity and accessibility. It could be used by the Bakerloo line when that arrives. Whatever the future of the line, the new station is vital. This needs to be specified in the proposed Bell Green Masterplan.

Bell Green is proposed as a regeneration node, in a Strategic Area for Regeneration. However, its proposed status has been downgraded from a proposed new Town Centre to a Local Centre. * The sites' indicative growth potential is shown for a town centre. The scope of brownfield development at Bell Green will create far more than a small cluster of shops for convenience retail, and a community anchor. It has far more than that already. The LLP seems conflicted about Bell Green's future, and it needs to be clarified before the GLA will consider designating it as an Opportunity Area.

*"Commented [NE791]: Latest Retail Impact Assessment and Town Centre Trends Study indicates scope for Local Centre is appropriate – this is reflected in amended policy point C.c above."

Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Response to Policy LSA3 Bell Green and Lower Sydenham

This policy is not sound in relation to Policy LSA3c, due to the lack of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve.

We need a Masterplan before the GLA will even consider designating Bell Green as an Opportunity Area. (LSA3 A). Lewisham has not started on a Masterplan (LSA3 B), despite having rejected the designation of a community Neighbourhood Forum that wished to create one. The aspiring Bell Green Neighbourhood Forum, refused designation by Lewisham, started work in 2019, and has had an extraordinarily hostile response from Lewisham, who have refused to have any discussions with us. We have a membership of 80, and despite an overwhelmingly positive local consultation response, Lewisham rejected our Area boundary, and so our Forum. They have since also refused to recognise us as an amenity society, having changed their definition of such groups to being based on the boundary of a single conservation area. This gives us little confidence in the delivery of such consultation.

The missing Masterplan undermines the aspirations expressed in Policy LSA3c; redevelopment of SA1, the Livesey Memorial Hall and gasworks

site, is already underway in the planning process; local residents' aspirations for the Masterplan, such as a reconfiguration of the roads and pedestrian access (LSA3 Ce) are being blocked. LSA3 Cg: infrastructure. Provision of sports facilities is of huge concern, given the closure of the Bridge Leisure Centre, and the imminent threat to the sports grounds at the Livesey Memorial Hall (SA1). Sport England, in their r18 response, stress the absence of a robust database. They say that this should include a revised Playing Pitch Strategy, and the Physical Activity and Healthy Lifestyles Strategy. Neither of these documents are published, and the current documents state that the Bridge as a functioning sports hall with swimming pools. We cannot assess Bell Green's sports provision need for new developments without a robust database; this information should have been included for the consultation process. An officer's report made in April 2023 says that '3.1. We are in the process of arranging a steering group meeting to ensure the PPS is still fit for purpose/relevant. This is in relation to changes in the way sport and physical activity are viewed post pandemic.' The Local Plan has been progressed before the necessary documents have been gathered.

Sydenham Green Health Centre (SA5) is another piece of community infrastructure already grossly overstretched by recent residential developments. It is proposed to be upgraded for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. Classed as urgent, but has not been actioned, despite being oversubscribed, and incapable of serving the impending new housing developments.

Currently there are extreme problems with the electricity grid at Bell Green retail park, with units powered entirely by diesel generators. There are frequent power cuts at the supermarkets, shutting off the fridges and freezers. Existing landowners and developers must cooperate to address the problem in advance of development.

Policy LSA3 Dd urges developers to respond positively to heritage assets and their setting, including the Livesey Hall War Memorial and gardens. This should read the (grade II listed) Livesey Memorial Hall, the Livesey Hall War Memorial, the Livesey Hall's Front Wall, and sportsgrounds. NOT gardens. This aspiration is being undermined by the lack of a Masterplan, which is allowing developers to push for tall buildings in close proximity with the Hall, threatening its viability as our Asset of Community Value. It is also undermining the Agent of Change protection of this important community hall, whose existing use of music, live performance and events for the local community is to be undermined by intensive residential development in close proximity. This will lead to conflict between the existing use and the new residents' quality of life. Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Site Allocations

SA1: Former Bell Green Gas Holders and Livesey Memorial Hall

SA1's boundary is problematic; two interlocking sites with separate landowners, both currently in the planning system (Apex and Barratt

London), plus a third landowner (SGN), currently withholding its land from development. This site allocation policy is not sound, as the omission of the gas pressure station prevents the creation of a coherent street pattern.

The southeast corner is designated as an **Appropriate Location For Tall Buildings**, despite its proximity to the listed structures of the Livesey Memorial Hall, the most sensitive and heritage-rich section of Bell Green. This proposed designation derives from the site-ownership-based boundaries shown at r18. The poor-quality mapping provided for the Tall Buildings zones, shown in opaque orange, obscured this block's isolation from the rest of the Tall Building zone by the Spine Road, which is a public highway, and a major access road. The relevant section of public highway is included in the r19 site boundary, though it cannot be developed. This isolated block has been overlooked by all but the most intense scrutiny.

SGN provided Lewisham with a plan, offering their gas pressure station area for development, yet their current public stance is that this area cannot be developed for safety reasons. This causes huge difficulties for the adjoining developments, as cooperation between developers to create a coherent streetscape is non-existent. This piecemeal approach won't build a positive community.

The Apex (Livesey Memorial Hall) site includes a strip of land adjoining the 'British Gas Exclusion Zone' SINC extension, which was assessed as being identical habitat to the SINC and designated in the Parks and Open Spaces strategy 2020-2025 (2020) as natural greenspace (not publicly accessible). Allowing Apex to redevelop this precious natural habitat within a toxic, barren landscape seems inexplicable. The site gradients make the

proposed green pathway impossible. The SINC sites were assessed in 2016 and have not been reviewed since. Even in 2016, no site visit was made, and it may have been classified by satellite photography. The report states: "Access to privately-owned sites was not always possible. This was due to a number of reasons including: Dense vegetation next to waterbodies at River Ravensbourneand Pool River Linear Park; combination of field survey, aerial photography and professional judgement was used to determine what habitats are likely to be present in areas not accessible by foot. However, in most cases surveying was possible from publicly accessible vantage points (such as from bridges or adjacent roads or open space." (p.38). Given that best practice is that environmental surveys should be renewed after c. 2 years, the status of the SINC extension, or at least the natural greenspace within the Apex site should be reviewed.

Agent of Change. Policy QD7 Cd. of the LLP says that new noise-sensitive development is situated away from existing noise-generating uses and activities, or, where this is not possible, providing adequate separation and acoustic design measures. The Livesey is a community hall whose existing uses include live performance, music, and events, which generates a great deal of noise. This is not a problem currently, and the arrival of housing close by will create a great deal of ongoing friction. The site boundary doesn't include the necessary no-build zone to protect the existing use of the Livesey. **Agent of Change**_Policy QD7 Cf. says that development must not prejudice the use of playing fields. The Bowls Green of the Livesey Memorial Hall is currently used as an exercise area for the boxing club, including the youth provision of Knives Down, Gloves Up

sessions. It has also been used by Brent Knoll school, a nearby special school with very little outside space, none of which is green. Both these schemes, along with other activities for children and young people, will be threatened by child protection concerns with overlooking from housing blocks.

Conclusion:

In order to make this site allocation sound, its Tall Buildings suitability zone needs reviewing, and robust justification given for its designation. There needs to be clarity over the SGN pressure station's future. It must be included in the design for the site layout, so a coherent street layout can be made. There needs to be a fresh assessment of the British Gas Site Buffer Zone greenspace, and of the greenspace within SA1, omitted from the SINC. The Agent of change aspects of redevelopment must be assessed thoroughly and included in the proposed Bell Green Masterplan.

The Bell Green Neighbourhood Group wishes to participate in examination hearing sessions, as site allocation issues have not been addressed by Lewisham, and they continue to refuse to engage with our community group.

SA3: Sainsbury's Bell Green

The proposed Bell Green Masterplan is needed to address the pedestrian safety issues of traffic bypassing the gyratory system, rat running through Sainsbury's carpark. Improvements in connectivity need to be made immediately to pedestrian access routes, which are currently being poorly served.

SA4: Stanton Square Locally Significant Industrial Site

SA4: This site allocation policy is not sound, as its boundary has not been justified robustly. It includes the local heritage asset of the Old Bathhouse, next to the Bell public house. This is a heritage asset which deserves local listing. Built as public slipper baths by Lewisham Council in the end of the 19th century, it survives with much of its interior intact. It is unthinkable that this should be redeveloped, and no justification is given for its inclusion. There is also no acknowledgement in this allocation of the extent of contamination of the Coventry Scaffolding site, and the wider area from the original gasworks, dating from c. 1850. The safety practices at this date were considerably worse than later, and it continued in gasworks use for many decades.

SA5: Sydenham Green Group Practice

Sydenham Green Health Centre (SA5) is already grossly overstretched due to new developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. Classed as urgent, but not actioned, despite being oversubscribed, and the impending housing developments. [Infrastructure Delivery plan].

SA8: Land at Pool Court

Policy SA8 is unsound, as it is ineffective in what it sets out to achieve. The site is unsuitable, being unfit for human habitation due to high risk of regular flooding at the confluence of two rivers. The quality of life is further degraded by being closely bordered by two railway lines. This site allocation fails to address Lewisham's duty to provide a travellers site; what is needed is rather a stopping site. Travellers have crossed the area for at

least four hundred years, still do so several times a year, and need somewhere to stop enroute. A tiny residential site doesn't address this need.

EC18 Culture, creative industries and the night-time economy

The Bell Green Neighbourhood Group supports the application being made for a Bell Green Cultural Quarter. The Livesey Memorial Hall has a proud history of live performance, music, and community events, along with art exhibitions and cultural activities. Sydenham Library hosts art studios, exhibitions, and workshops. It is the base for Spontaneous Productions shows being shown in Home Park, next door. Whirled Art Studios has set up a complex of studios on Stanton Island, which were rented out immediately. My Aerial Home is a distinguished studio and school for aerial circus disciplines, based on the Trade City retail park, and Glenlyn Academy is a dance and performance school based on the Home Park Estate. Given the EC18 policy for growing the creative industries as a source of employment in Lewisham, further studios would be a positive use of the heavily contaminated land of the Coventry Scaffolding yard. Site of the earliest phase of the Bell Green gasworks, the contamination is likely to be very bad, and would be prohibitively expensive to remediate it to the level acceptable for residential use. The Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions on this matter, as it is vital to the development of employment opportunities in Bell Green.

Schedule 1.

Table 21.1 Livesey Memorial Hall should be added to the list of Local Landmarks.

Schedule 2.

Table 21.2 Missing from Conservation Area list - The Thorpes Conservation Area.

Table 21.2 London Squares – Taymount Rise is missing from the list. Fambridge close is NOT the substitute for the designated Stanton Square. Stanton Square was redeveloped without substitution, and restitution attempts are in process.

Schedule 5

Table 21.5 No mention of any retail existing at Bell Green, or on Perry Hill/Catford Hill.

Schedule 6

Table 21.6 Cultural Quarters. Please add Bell Green.

Schedule 11

Table 21.11 Growth corridor - Perry Hill- Catford Hill not listed but shown on Policies Map.

Conclusions on the LLP consultations for the attention of the Planning Inspector:

Consultation on the Lewisham Local Plan has been deeply flawed. Regulation 18 was conducted during the pandemic, with limited communication available. Anyone with difficulty accessing online material was excluded from involvement in the consultation. Regulation 19 consultation has taken place simultaneously with one on the Statement of Community Involvement, and constitutional changes to Lewisham Council's planning arrangements have already been approved by the full council, in advance of the SCI consultation's conclusions. Taking all of this into account, further formal consultation is needed to achieve a common understanding of all the plans and changes proposed. Therefore, the Bell Green Neighbourhood Group concludes that this consultation is not sound, as the draft Lewisham Local Plan is neither robustly justified nor evidenced. The lack of supporting evidence (including the Bell Green Masterplan, the Playing Pitch Strategy and the Physical Activity and Healthy Lifestyles Strategy) means that it cannot be effective in what it sets out to achieve.

In light of these facts, it is clear that the Lewisham Local Plan needs substantial modifications, and the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Email from Councillor Liam Curran, Sydenham Ward

Dear Friends,

I am writing to endorse and support the attached submission by the Bell Green Neighbourhood Forum to the Lewisham Local Plan consultation. I am a member of the Bell Green Neighbourhood Forum.

Please also accept this as my submission to the Local Plan. I may also wish to make representations as a ward councillor at the examination.

Kind regards

Liam

Response to Policy LSA1: South Area place principle.

This policy is not sound in relation to policy LSA1a, which cites the Open Lewisham strategic objective (OL1), in the absence of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve.

The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to start this as soon as possible. We are told that the neighbourhood will be 'focused around a new local centre', but without a masterplan, we don't know where the focal point will be. Deciding on the eventual position of the new station and bus interchange would allow the central area to be planned around it.

Good growth opportunities for Bell Green are blocked by waiting for the Bakerloo Line. For decades, this has delayed any decision on relocating the current station which is isolated, connecting with only one bus, from Bell Green to Bromley. The Bakerloo extension 2 is unlikely to happen within the lifespan of this Local Plan, and alternative strategies exist to enable positive development. If the current station was moved, it would immediately improve PTAL rating, even if it weren't possible to convert the line for underground or overground services.

None of the active travel connectivity can be delivered in the absence of a Bell Green Masterplan, as developers cannot deliver any such connectivity on a single plot. Once the desired routes are set out in the Masterplan, developers have something to work on. (Policy LSA I)

Sydenham Green Health Centre (SA5) is already grossly overstretched due to new housing developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. This is classed as urgent, but has not been actioned, and there is no evidence of any plans in place. Any new developments will overwhelm the Health Centre's capacity, so this vital infrastructure needs expanding whether the N4 hub project is confirmed or not. This should be included in the Bell Green Masterplan.

Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Response to Policy LSA2 South Area place principle.

This policy is not sound in relation to policy LSA2b, due to the lack of a Bell Green Masterplan, robust data about the existing and projected future capacity needed in social infrastructure, and other vital supporting evidence. The lack of these guidelines makes the policy ineffective in what it sets out to achieve. The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to get started without delay.

Significant transport accessibility improvements, active travel routes, and the transformation of the retail park into a new mixed-use neighbourhood cannot happen without a masterplan (LSA2b). Waiting for the Bakerloo campaign is delaying good growth in Bell Green. Move the station, and either the mainline service or Overground would improve connectivity and accessibility. It could be used by the Bakerloo line when that arrives. Whatever the future of the line, the new station is vital. This needs to be specified in the proposed Bell Green Masterplan.

Bell Green is proposed as a regeneration node, in a Strategic Area for Regeneration. However, its proposed status has been downgraded from a proposed new Town Centre to a Local Centre. * The sites' indicative growth potential is shown for a town centre. The scope of brownfield development at Bell Green will create far more than a small cluster of shops for convenience retail, and a community anchor. It has far more than that already. The LLP seems conflicted about Bell Green's future, and it needs

to be clarified before the GLA will consider designating it as an Opportunity Area.

*“Commented [NE791]: Latest Retail Impact Assessment and Town Centre Trends Study indicates scope for Local Centre is appropriate – this is reflected in amended policy point C.c above.”

Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Response to Policy LSA3 Bell Green and Lower Sydenham

This policy is not sound in relation to Policy LSA3c, due to the lack of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve.

We need a Masterplan before the GLA will even consider designating Bell Green as an Opportunity Area. (LSA3 A). Lewisham has not started on a Masterplan (LSA3 B), despite having rejected the designation of a community Neighbourhood Forum that wished to create one. The aspiring Bell Green Neighbourhood Forum, refused designation by Lewisham, started work in 2019, and has had an extraordinarily hostile response from Lewisham, who have refused to have any discussions with us. We have a membership of 80, and despite an overwhelmingly positive local consultation response, Lewisham rejected our Area boundary, and so our Forum. They have since also refused to recognise us as an amenity society, having changed their definition of such groups to being based on

the boundary of a single conservation area. This gives us little confidence in the delivery of such consultation.

The missing Masterplan undermines the aspirations expressed in Policy LSA3c; redevelopment of SA1, the Livesey Memorial Hall and gasworks site, is already underway in the planning process; local residents' aspirations for the Masterplan, such as a reconfiguration of the roads and pedestrian access (LSA3 Ce) are being blocked. LSA3 Cg: infrastructure. Provision of sports facilities is of huge concern, given the closure of the Bridge Leisure Centre, and the imminent threat to the sports grounds at the Livesey Memorial Hall (SA1). Sport England, in their r18 response, stress the absence of a robust database. They say that this should include a revised Playing Pitch Strategy, and the Physical Activity and Healthy Lifestyles Strategy. Neither of these documents are published, and the current documents state that the Bridge as a functioning sports hall with swimming pools. We cannot assess Bell Green's sports provision need for new developments without a robust database; this information should have been included for the consultation process. An officer's report made in April 2023 says that '3.1. We are in the process of arranging a steering group meeting to ensure the PPS is still fit for purpose/relevant. This is in relation to changes in the way sport and physical activity are viewed post pandemic.' The Local Plan has been progressed before the necessary documents have been gathered.

Sydenham Green Health Centre (SA5) is another piece of community infrastructure already grossly overstretched by recent residential developments. It is proposed to be upgraded for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of

Lewisham. Classed as urgent, but has not been actioned, despite being oversubscribed, and incapable of serving the impending new housing developments.

Currently there are extreme problems with the electricity grid at Bell Green retail park, with units powered entirely by diesel generators. There are frequent power cuts at the supermarkets, shutting off the fridges and freezers. Existing landowners and developers must cooperate to address the problem in advance of development.

Policy LSA3 Dd urges developers to respond positively to heritage assets and their setting, including the Livesey Hall War Memorial and gardens. This should read the (grade II listed) Livesey Memorial Hall, the Livesey Hall War Memorial, the Livesey Hall's Front Wall, and sportsgrounds. NOT gardens. This aspiration is being undermined by the lack of a Masterplan, which is allowing developers to push for tall buildings in close proximity with the Hall, threatening its viability as our Asset of Community Value. It is also undermining the Agent of Change protection of this important community hall, whose existing use of music, live performance and events for the local community is to be undermined by intensive residential development in close proximity. This will lead to conflict between the existing use and the new residents' quality of life. Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Site Allocations

SA1: Former Bell Green Gas Holders and Livesey Memorial Hall

SA1's boundary is problematic; two interlocking sites with separate landowners, both currently in the planning system (Apex and Barratt London), plus a third landowner (SGN), currently withholding its land from development. This site allocation policy is not sound, as the omission of the gas pressure station prevents the creation of a coherent street pattern.

The southeast corner is designated as an **Appropriate Location For Tall Buildings**, despite its proximity to the listed structures of the Livesey Memorial Hall, the most sensitive and heritage-rich section of Bell Green. This proposed designation derives from the site-ownership-based boundaries shown at r18. The poor-quality mapping provided for the Tall Buildings zones, shown in opaque orange, obscured this block's isolation from the rest of the Tall Building zone by the Spine Road, which is a public highway, and a major access road. The relevant section of public highway is included in the r19 site boundary, though it cannot be developed. This isolated block has been overlooked by all but the most intense scrutiny.

SGN provided Lewisham with a plan, offering their gas pressure station area for development, yet their current public stance is that this area cannot be developed for safety reasons. This causes huge difficulties for the adjoining developments, as cooperation between developers to create a coherent streetscape is non-existent. This piecemeal approach won't build a positive community.

The Apex (Livesey Memorial Hall) site includes a strip of land adjoining the 'British Gas Exclusion Zone' SINC extension, which was assessed as being identical habitat to the SINC and designated in the Parks and Open Spaces

strategy 2020-2025 (2020) as natural greenspace (not publicly accessible). Allowing Apex to redevelop this precious natural habitat within a toxic, barren landscape seems inexplicable. The site gradients make the proposed green pathway impossible. The SINC sites were assessed in 2016 and have not been reviewed since. Even in 2016, no site visit was made, and it may have been classified by satellite photography. The report states: "Access to privately-owned sites was not always possible. This was due to a number of reasons including: Dense vegetation next to waterbodies at River Ravensbourneand Pool River Linear Park; combination of field survey, aerial photography and professional judgement was used to determine what habitats are likely to be present in areas not accessible by foot. However, in most cases surveying was possible from publicly accessible vantage points (such as from bridges or adjacent roads or open space." (p.38). Given that best practice is that environmental surveys should be renewed after c. 2 years, the status of the SINC extension, or at least the natural greenspace within the Apex site should be reviewed.

Agent of Change. Policy QD7 Cd. of the LLP says that new noise-sensitive development is situated away from existing noise-generating uses and activities, or, where this is not possible, providing adequate separation and acoustic design measures. The Livesey is a community hall whose existing uses include live performance, music, and events, which generates a great deal of noise. This is not a problem currently, and the arrival of housing close by will create a great deal of ongoing friction. The site boundary doesn't include the necessary no-build zone to protect the existing use of the Livesey. **Agent of Change** Policy QD7 Cf. says that

development must not prejudice the use of playing fields. The Bowls Green of the Livesey Memorial Hall is currently used as an exercise area for the boxing club, including the youth provision of Knives Down, Gloves Up sessions. It has also been used by Brent Knoll school, a nearby special school with very little outside space, none of which is green. Both these schemes, along with other activities for children and young people, will be threatened by child protection concerns with overlooking from housing blocks.

Conclusion:

In order to make this site allocation sound, its Tall Buildings suitability zone needs reviewing, and robust justification given for its designation. There needs to be clarity over the SGN pressure station's future. It must be included in the design for the site layout, so a coherent street layout can be made. There needs to be a fresh assessment of the British Gas Site Buffer Zone greenspace, and of the greenspace within SA1, omitted from the SINC. The Agent of change aspects of redevelopment must be assessed thoroughly and included in the proposed Bell Green Masterplan.

The Bell Green Neighbourhood Group wishes to participate in examination hearing sessions, as site allocation issues have not been addressed by Lewisham, and they continue to refuse to engage with our community group.

SA3: Sainsbury's Bell Green

The proposed Bell Green Masterplan is needed to address the pedestrian safety issues of traffic bypassing the gyratory system, rat running through

Sainsbury's carpark. Improvements in connectivity need to be made immediately to pedestrian access routes, which are currently being poorly served.

SA4: Stanton Square Locally Significant Industrial Site

SA4: This site allocation policy is not sound, as its boundary has not been justified robustly. It includes the local heritage asset of the Old Bathhouse, next to the Bell public house. This is a heritage asset which deserves local listing. Built as public slipper baths by Lewisham Council in the end of the 19th century, it survives with much of its interior intact. It is unthinkable that this should be redeveloped, and no justification is given for its inclusion. There is also no acknowledgement in this allocation of the extent of contamination of the Coventry Scaffolding site, and the wider area from the original gasworks, dating from c. 1850. The safety practices at this date were considerably worse than later, and it continued in gasworks use for many decades.

SA5: Sydenham Green Group Practice

Sydenham Green Health Centre (SA5) is already grossly overstretched due to new developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. Classed as urgent, but not actioned, despite being oversubscribed, and the impending housing developments. [Infrastructure Delivery plan].

SA8: Land at Pool Court

Policy SA8 is unsound, as it is ineffective in what it sets out to achieve. The site is unsuitable, being unfit for human habitation due to high risk of regular flooding at the confluence of two rivers. The quality of life is further

degraded by being closely bordered by two railway lines. This site allocation fails to address Lewisham's duty to provide a travellers site; what is needed is rather a stopping site. Travellers have crossed the area for at least four hundred years, still do so several times a year, and need somewhere to stop enroute. A tiny residential site doesn't address this need.

EC18 Culture, creative industries and the night-time economy

The Bell Green Neighbourhood Group supports the application being made for a Bell Green Cultural Quarter. The Livesey Memorial Hall has a proud history of live performance, music, and community events, along with art exhibitions and cultural activities. Sydenham Library hosts art studios, exhibitions, and workshops. It is the base for Spontaneous Productions shows being shown in Home Park, next door. Whirled Art Studios has set up a complex of studios on Stanton Island, which were rented out immediately. My Aerial Home is a distinguished studio and school for aerial circus disciplines, based on the Trade City retail park, and Glenlyn Academy is a dance and performance school based on the Home Park Estate. Given the EC18 policy for growing the creative industries as a source of employment in Lewisham, further studios would be a positive use of the heavily contaminated land of the Coventry Scaffolding yard. Site of the earliest phase of the Bell Green gasworks, the contamination is likely to be very bad, and would be prohibitively expensive to remediate it to the level acceptable for residential use. The Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing

sessions on this matter, as it is vital to the development of employment opportunities in Bell Green.

Schedule 1.

Table 21.1 Livesey Memorial Hall should be added to the list of Local Landmarks.

Schedule 2.

Table 21.2 Missing from Conservation Area list - The Thorpes Conservation Area.

Table 21.2 London Squares – Taymount Rise is missing from the list. Fambridge close is NOT the substitute for the designated Stanton Square. Stanton Square was redeveloped without substitution, and restitution attempts are in process.

Schedule 5

Table 21.5 No mention of any retail existing at Bell Green, or on Perry Hill/Catford Hill.

Schedule 6

Table 21.6 Cultural Quarters. Please add Bell Green.

Schedule 11

Table 21.11 Growth corridor - Perry Hill- Catford Hill not listed but shown on Policies Map.

Conclusions on the LLP consultations for the attention of the Planning Inspector:

Consultation on the Lewisham Local Plan has been deeply flawed. Regulation 18 was conducted during the pandemic, with limited communication available. Anyone with difficulty accessing online material was excluded from involvement in the consultation. Regulation 19 consultation has taken place simultaneously with one on the Statement of Community Involvement, and constitutional changes to Lewisham Council's planning arrangements have already been approved by the full council, in advance of the SCI consultation's conclusions. Taking all of this into account, further formal consultation is needed to achieve a common understanding of all the plans and changes proposed. Therefore, the Bell Green Neighbourhood Group concludes that this consultation is not sound, as the draft Lewisham Local Plan is neither robustly justified nor evidenced. The lack of supporting evidence (including the Bell Green Masterplan, the Playing Pitch Strategy and the Physical Activity and Healthy Lifestyles Strategy) means that it cannot be effective in what it sets out to achieve.

In light of these facts, it is clear that the Lewisham Local Plan needs substantial modifications, and the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Email from Deone Costley

Hi

As part of the consultation I would like to raise a few concerns with the "soundness" of the plan.

- There is no proposed Air Quality Focus Area proposed for the Bell Green area although it sits along a corridor of Air Quality Management (Ribbon) - see SD6
- There is no mention of a proposed Bell Green station (whether it be part of national rail or London Underground / TfL) - see TR1.
- There is no mention of the removal of the Bell Green Gyratory - See TR1.
- There is no explicit mention of the above points with regards to LSA3 nor the re-wilding of the Pool River in Southend Park.

Regards

Deone

Email from Edward Stern

To: Christopher Frazer,
Lewisham Planning Service,
For the attention of the Planning Inspector:

Dear Sirs,

I am a local resident, living just up Perry Hill from the proposed development. I strongly agree with the Bell Green Neighbourhood Group's response to r19 LLP and consider the criticism to the plans entirely valid.

The LLP refers to developers following the Bell Green masterplan, which does not exist. It appears to be based on baseless assumptions about the Bakerloo Line expansion. It lacks the most basic data about sports facilities and public transport. Critically it lacks justification for building such high-density high-rise development in an area that is and will continue to be so poorly served by public transport, let alone building a 15 storey tower block right next to the Livesy Memorial Hall. It does not justify its case, and does not appear legally sound. I urge you to reject the plan as it stands and require the developers to do the work required of them. Frankly their proposal appears shoddy, and reflects poorly on them and on any authority which would wave through such a plan. I'm not at all opposed to development of the site - there's a genuine need for more housing, and a great deal of potential improvement for the area. But the plan as it stands just isn't good enough.

Yours faithfully,
Edward Stern

BGNG response is as follows:

Response to Policy LSA1: South Area place principle.

This policy is not sound in relation to policy LSA1a, which cites the Open Lewisham strategic objective (OL1), in the absence of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve. The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to start this as soon as possible. We are told that the neighbourhood will be 'focused around a new local centre', but without a masterplan, we don't know where the focal point will be. Deciding on the eventual position of the new station and bus interchange would allow the central area to be planned around it.

Good growth opportunities for Bell Green are blocked by waiting for the Bakerloo Line. For decades, this has delayed any decision on relocating the current station which is isolated, connecting with only one bus, from Bell Green to Bromley. The Bakerloo extension 2 is unlikely to happen within the lifespan of this Local Plan, and alternative strategies exist to enable positive development. If the current station was moved, it would immediately improve PTAL rating, even if it weren't possible to convert the line for underground or overground services.

None of the active travel connectivity can be delivered in the absence of a Bell Green Masterplan, as developers cannot deliver any such connectivity on a single plot. Once the desired routes are set out in the Masterplan, developers have something to work on. (Policy LSA I)
Sydenham Green Health Centre (SA5) is already grossly overstretched

due to new housing developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. This is classed as urgent, but has not been actioned, and there is no evidence of any plans in place. Any new developments will overwhelm the Health Centre's capacity, so this vital infrastructure needs expanding whether the N4 hub project is confirmed or not. This should be included in the Bell Green Masterplan.

Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Response to Policy LSA2 South Area place principle.

This policy is not sound in relation to policy LSA2b, due to the lack of a Bell Green Masterplan, robust data about the existing and projected future capacity needed in social infrastructure, and other vital supporting evidence. The lack of these guidelines makes the policy ineffective in what it sets out to achieve. The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to get started without delay.

Significant transport accessibility improvements, active travel routes, and the transformation of the retail park into a new mixed-use neighbourhood cannot happen without a masterplan (LSA2b). Waiting for the Bakerloo campaign is delaying good growth in Bell Green. Move the station, and either the mainline service or Overground would improve connectivity and accessibility. It could be used by the Bakerloo line when that arrives.

Whatever the future of the line, the new station is vital. This needs to be specified in the proposed Bell Green Masterplan.

Bell Green is proposed as a regeneration node, in a Strategic Area for Regeneration. However, its proposed status has been downgraded from a proposed new Town Centre to a Local Centre. * The sites' indicative growth potential is shown for a town centre. The scope of brownfield development at Bell Green will create far more than a small cluster of shops for convenience retail, and a community anchor. It has far more than that already. The LLP seems conflicted about Bell Green's future, and it needs to be clarified before the GLA will consider designating it as an Opportunity Area.

*"Commented [NE791]: Latest Retail Impact Assessment and Town Centre Trends Study indicates scope for Local Centre is appropriate – this is reflected in amended policy point C.c above."

Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Response to Policy LSA3 Bell Green and Lower Sydenham

This policy is not sound in relation to Policy LSA3c, due to the lack of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve.

We need a Masterplan before the GLA will even consider designating Bell Green as an Opportunity Area. (LSA3 A). Lewisham has not started on a Masterplan (LSA3 B), despite having rejected the designation of a community Neighbourhood Forum that wished to create one. The aspiring Bell Green Neighbourhood Forum, refused designation by

Lewisham, started work in 2019, and has had an extraordinarily hostile response from Lewisham, who have refused to have any discussions with us. We have a membership of 80, and despite an overwhelmingly positive local consultation response, Lewisham rejected our Area boundary, and so our Forum. They have since also refused to recognise us as an amenity society, having changed their definition of such groups to being based on the boundary of a single conservation area. This gives us little confidence in the delivery of such consultation.

The missing Masterplan undermines the aspirations expressed in Policy LSA3c; redevelopment of SA1, the Livesey Memorial Hall and gasworks site, is already underway in the planning process; local residents' aspirations for the Masterplan, such as a reconfiguration of the roads and pedestrian access (LSA3 Ce) are being blocked. LSA3 Cg: infrastructure. Provision of sports facilities is of huge concern, given the closure of the Bridge Leisure Centre, and the imminent threat to the sports grounds at the Livesey Memorial Hall (SA1). Sport England, in their r18 response, stress the absence of a robust database. They say that this should include a revised Playing Pitch Strategy, and the Physical Activity and Healthy Lifestyles Strategy. Neither of these documents are published, and the current documents state that the Bridge as a functioning sports hall with swimming pools. We cannot assess Bell Green's sports provision need for new developments without a robust database; this information should have been included for the consultation process. An officer's report made in April 2023 says that '3.1. We are in the process of arranging a steering group meeting to ensure the PPS is still fit for purpose/relevant. This is in relation to changes in the way sport and physical activity are viewed post pandemic.' The Local Plan has been progressed before the necessary documents have been gathered.

Sydenham Green Health Centre (SA5) is another piece of community infrastructure already grossly overstretched by recent residential developments. It is proposed to be upgraded for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. Classed as urgent, but has not been actioned, despite being oversubscribed, and incapable of serving the impending new housing developments.

Currently there are extreme problems with the electricity grid at Bell Green retail park, with units powered entirely by diesel generators. There are frequent power cuts at the supermarkets, shutting off the fridges and freezers. Existing landowners and developers must cooperate to address the problem in advance of development.

Policy LSA3 Dd urges developers to respond positively to heritage assets and their setting, including the Livesey Hall War Memorial and gardens. This should read the (grade II listed) Livesey Memorial Hall, the Livesey Hall War Memorial, the Livesey Hall's Front Wall, and sportsgrounds. NOT gardens. This aspiration is being undermined by the lack of a Masterplan, which is allowing developers to push for tall buildings in close proximity with the Hall, threatening its viability as our Asset of Community Value. It is also undermining the Agent of Change protection of this important community hall, whose existing use of music, live performance and events for the local community is to be undermined by intensive residential development in close proximity. This will lead to conflict between the existing use and the new residents' quality of life. Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Site Allocations

SA1: Former Bell Green Gas Holders and Livesey Memorial Hall

SA1's boundary is problematic; two interlocking sites with separate landowners, both currently in the planning system (Apex and Barratt London), plus a third landowner (SGN), currently withholding its land from development. This site allocation policy is not sound, as the omission of the gas pressure station prevents the creation of a coherent street pattern.

The southeast corner is designated as an Appropriate Location For Tall Buildings, despite its proximity to the listed structures of the Livesey Memorial Hall, the most sensitive and heritage-rich section of Bell Green. This proposed designation derives from the site-ownership-based boundaries shown at r18. The poor-quality mapping provided for the Tall Buildings zones, shown in opaque orange, obscured this block's isolation from the rest of the Tall Building zone by the Spine Road, which is a public highway, and a major access road. The relevant section of public highway is included in the r19 site boundary, though it cannot be developed. This isolated block has been overlooked by all but the most intense scrutiny.

SGN provided Lewisham with a plan, offering their gas pressure station area for development, yet their current public stance is that this area cannot be developed for safety reasons. This causes huge difficulties for the adjoining developments, as cooperation between developers to create a coherent streetscape is non-existent. This piecemeal approach won't build a positive community.

The Apex (Livesey Memorial Hall) site includes a strip of land adjoining the 'British Gas Exclusion Zone' SINC extension, which was assessed

as being identical habitat to the SINC and designated in the Parks and Open Spaces strategy 2020-2025 (2020) as natural greenspace (not publicly accessible). Allowing Apex to redevelop this precious natural habitat within a toxic, barren landscape seems inexplicable. The site gradients make the proposed green pathway impossible. The SINC sites were assessed in 2016 and have not been reviewed since. Even in 2016, no site visit was made, and it may have been classified by satellite photography. The report states: "Access to privately-owned sites was not always possible. This was due to a number of reasons including: Dense vegetation next to waterbodies at River Ravensbourneand Pool River Linear Park; combination of field survey, aerial photography and professional judgement was used to determine what habitats are likely to be present in areas not accessible by foot. However, in most cases surveying was possible from publicly accessible vantage points (such as from bridges or adjacent roads or open space." (p.38). Given that best practice is that environmental surveys should be renewed after c. 2 years, the status of the SINC extension, or at least the natural greenspace within the Apex site should be reviewed.

Agent of Change. Policy QD7 Cd. of the LLP says that new noise-sensitive development is situated away from existing noise-generating uses and activities, or, where this is not possible, providing adequate separation and acoustic design measures. The Livesey is a community hall whose existing uses include live performance, music, and events, which generates a great deal of noise. This is not a problem currently, and the arrival of housing close by will create a great deal of ongoing friction. The site boundary doesn't include the necessary no-build zone to protect the existing use of the Livesey. Agent of Change Policy QD7 Cf. says that development must not prejudice the use of playing fields.

The Bowls Green of the Livesey Memorial Hall is currently used as an exercise area for the boxing club, including the youth provision of Knives Down, Gloves Up sessions. It has also been used by Brent Knoll school, a nearby special school with very little outside space, none of which is green. Both these schemes, along with other activities for children and young people, will be threatened by child protection concerns with overlooking from housing blocks.

Conclusion:

In order to make this site allocation sound, its Tall Buildings suitability zone needs reviewing, and robust justification given for its designation. There needs to be clarity over the SGN pressure station's future. It must be included in the design for the site layout, so a coherent street layout can be made. There needs to be a fresh assessment of the British Gas Site Buffer Zone greenspace, and of the greenspace within SA1, omitted from the SINC. The Agent of change aspects of redevelopment must be assessed thoroughly and included in the proposed Bell Green Masterplan.

The Bell Green Neighbourhood Group wishes to participate in examination hearing sessions, as site allocation issues have not been addressed by Lewisham, and they continue to refuse to engage with our community group.

SA3: Sainsbury's Bell Green

The proposed Bell Green Masterplan is needed to address the pedestrian safety issues of traffic bypassing the gyratory system, rat running through Sainsbury's carpark. Improvements in connectivity need to be made immediately to pedestrian access routes, which are currently being poorly served.

SA4: Stanton Square Locally Significant Industrial Site

SA4: This site allocation policy is not sound, as its boundary has not been justified robustly. It includes the local heritage asset of the Old Bathhouse, next to the Bell public house. This is a heritage asset which deserves local listing. Built as public slipper baths by Lewisham Council in the end of the 19th century, it survives with much of its interior intact. It is unthinkable that this should be redeveloped, and no justification is given for its inclusion. There is also no acknowledgement in this allocation of the extent of contamination of the Coventry Scaffolding site, and the wider area from the original gasworks, dating from c. 1850. The safety practices at this date were considerably worse than later, and it continued in gasworks use for many decades.

SA5: Sydenham Green Group Practice

Sydenham Green Health Centre (SA5) is already grossly overstretched due to new developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. Classed as urgent, but not actioned, despite being oversubscribed, and the impending housing developments. [Infrastructure Delivery plan].

SA8: Land at Pool Court

Policy SA8 is unsound, as it is ineffective in what it sets out to achieve. The site is unsuitable, being unfit for human habitation due to high risk of regular flooding at the confluence of two rivers. The quality of life is further degraded by being closely bordered by two railway lines. This site allocation fails to address Lewisham's duty to provide a travellers site; what is needed is rather a stopping site. Travellers have crossed

the area for at least four hundred years, still do so several times a year, and need somewhere to stop enroute. A tiny residential site doesn't address this need.

EC18 Culture, creative industries and the night-time economy

The Bell Green Neighbourhood Group supports the application being made for a Bell Green Cultural Quarter. The Livesey Memorial Hall has a proud history of live performance, music, and community events, along with art exhibitions and cultural activities. Sydenham Library hosts art studios, exhibitions, and workshops. It is the base for Spontaneous Productions shows being shown in Home Park, next door. Whirled Art Studios has set up a complex of studios on Stanton Island, which were rented out immediately. My Aerial Home is a distinguished studio and school for aerial circus disciplines, based on the Trade City retail park, and Glenlyn Academy is a dance and performance school based on the Home Park Estate. Given the EC18 policy for growing the creative industries as a source of employment in Lewisham, further studios would be a positive use of the heavily contaminated land of the Coventry Scaffolding yard. Site of the earliest phase of the Bell Green gasworks, the contamination is likely to be very bad, and would be prohibitively expensive to remediate it to the level acceptable for residential use. The Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions on this matter, as it is vital to the development of employment opportunities in Bell Green.

Schedule 1.

Table 21.1 Livesey Memorial Hall should be added to the list of Local Landmarks.

Schedule 2.

Table 21.2 Missing from Conservation Area list - The Thorpes Conservation Area.

Table 21.2 London Squares – Taymount Rise is missing from the list. Fambridge close is NOT the substitute for the designated Stanton Square. Stanton Square was redeveloped without substitution, and restitution attempts are in process.

Schedule 5

Table 21.5 No mention of any retail existing at Bell Green, or on Perry Hill/Catford Hill.

Schedule 6

Table 21.6 Cultural Quarters. Please add Bell Green.

Schedule 11

Table 21.11 Growth corridor - Perry Hill- Catford Hill not listed but shown on Policies Map.

Conclusions on the LLP consultations for the attention of the Planning Inspector:

Consultation on the Lewisham Local Plan has been deeply flawed. Regulation 18 was conducted during the pandemic, with limited communication available. Anyone with difficulty accessing online material was excluded from involvement in the consultation. Regulation 19 consultation has taken place simultaneously with one on the Statement of Community Involvement, and constitutional changes to Lewisham Council's planning arrangements have already been approved by the full council, in advance of the SCI consultation's

conclusions. Taking all of this into account, further formal consultation is needed to achieve a common understanding of all the plans and changes proposed. Therefore, the Bell Green Neighbourhood Group concludes that this consultation is not sound, as the draft Lewisham Local Plan is neither robustly justified nor evidence led. The lack of supporting evidence (including the Bell Green Masterplan, the Playing Pitch Strategy and the Physical Activity and Healthy Lifestyles Strategy) means that it cannot be effective in what it sets out to achieve.

In light of these facts, it is clear that the Lewisham Local Plan needs substantial modifications, and the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Email from Elizabeth Carlisle

Dear Sir

The proposed high rise development of Bell Green is poorly thought out. This area does not have the infrastructure to sustain such a development. It is well known that high rise living does, not make a community I think the planners need to look at the housing needs no profit

Yours Faithfully

Elizabeth Carlisle (a resident in Sydenham for 40 years)

Email from Julia Webb

Dear ***Redacted***,

Please find attached this response to the r19 draft LLP consultation, which I endorse, and wish to submit as my own personal response.

Best wishes.

Julia

Response to Policy LSA1: South Area place principle.

This policy is not sound in relation to policy LSA1a, which cites the Open Lewisham strategic objective (OL1), in the absence of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve.

The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to start this as soon as possible. We are told that the neighbourhood will be 'focused around a new local centre', but without a masterplan, we don't know where the focal point will be. Deciding on the eventual position of the new station and bus interchange would allow the central area to be planned around it.

Good growth opportunities for Bell Green are blocked by waiting for the Bakerloo Line. For decades, this has delayed any decision on relocating the current station which is isolated, connecting with only one bus, from Bell Green to Bromley. The Bakerloo extension 2 is unlikely to happen within the lifespan of this Local Plan, and alternative strategies exist to enable positive development. If the current station was moved, it would immediately improve PTAL rating, even if it weren't possible to convert the line for underground or overground services.

None of the active travel connectivity can be delivered in the absence of a Bell Green Masterplan, as developers cannot deliver any such connectivity on a single plot. Once the desired routes are set out in the Masterplan, developers have something to work on. (Policy LSA I)

Sydenham Green Health Centre (SA5) is already grossly overstretched due to new housing developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. This is classed as urgent, but has not been actioned, and there is no evidence of any plans in place. Any new developments will overwhelm the Health Centre's capacity, so this vital infrastructure needs expanding whether the N4 hub project is confirmed or not. This should be included in the Bell Green Masterplan.

Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Response to Policy LSA2 South Area place principle.

This policy is not sound in relation to policy LSA2b, due to the lack of a Bell Green Masterplan, robust data about the existing and projected future capacity needed in social infrastructure, and other vital supporting evidence. The lack of these guidelines makes the policy ineffective in what it sets out to achieve. The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to get started without delay.

Significant transport accessibility improvements, active travel routes, and the transformation of the retail park into a new mixed-use neighbourhood cannot happen without a masterplan (LSA2b). Waiting for the Bakerloo campaign is delaying good growth in Bell Green. Move the station, and either the mainline service or Overground would improve connectivity and accessibility. It could be used by the Bakerloo line when that arrives. Whatever the future of the line, the new station is vital. This needs to be specified in the proposed Bell Green Masterplan.

Bell Green is proposed as a regeneration node, in a Strategic Area for Regeneration. However, its proposed status has been downgraded from a proposed new Town Centre to a Local Centre. * The sites' indicative growth potential is shown for a town centre. The scope of brownfield development at Bell Green will create far more than a small cluster of shops for convenience retail, and a community anchor. It has far more than that already. The LLP seems conflicted about Bell Green's future,

and it needs to be clarified before the GLA will consider designating it as an Opportunity Area.

*“Commented [NE791]: Latest Retail Impact Assessment and Town Centre Trends Study indicates scope for Local Centre is appropriate – this is reflected in amended policy point C.c above.”

Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Response to Policy LSA3 Bell Green and Lower Sydenham

This policy is not sound in relation to Policy LSA3c, due to the lack of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve.

We need a Masterplan before the GLA will even consider designating Bell Green as an Opportunity Area. (LSA3 A). Lewisham has not started on a Masterplan (LSA3 B), despite having rejected the designation of a community Neighbourhood Forum that wished to create one. The aspiring Bell Green Neighbourhood Forum, refused designation by Lewisham, started work in 2019, and has had an extraordinarily hostile response from Lewisham, who have refused to have any discussions with us. We have a membership of 80, and despite an overwhelmingly

positive local consultation response, Lewisham rejected our Area boundary, and so our Forum. They have since also refused to recognise us as an amenity society, having changed their definition of such groups to being based on the boundary of a single conservation area. This gives us little confidence in the delivery of such consultation.

The missing Masterplan undermines the aspirations expressed in Policy LSA3c; redevelopment of SA1, the Livesey Memorial Hall and gasworks site, is already underway in the planning process; local residents' aspirations for the Masterplan, such as a reconfiguration of the roads and pedestrian access (LSA3 Ce) are being blocked. LSA3 Cg: infrastructure. Provision of sports facilities is of huge concern, given the closure of the Bridge Leisure Centre, and the imminent threat to the sports grounds at the Livesey Memorial Hall (SA1). Sport England, in their r18 response, stress the absence of a robust database. They say that this should include a revised Playing Pitch Strategy, and the Physical Activity and Healthy Lifestyles Strategy. Neither of these documents are published, and the current documents state that the Bridge as a functioning sports hall with swimming pools. We cannot assess Bell Green's sports provision need for new developments without a robust database; this information should have been included for the consultation process. An officer's report made in April 2023 says that '3.1. We are in the process of arranging a steering group meeting to ensure the PPS is still fit for purpose/relevant. This is in relation to changes in the way sport and physical activity are viewed post pandemic.' The Local Plan has been progressed before the necessary documents have been gathered.

Sydenham Green Health Centre (SA5) is another piece of community infrastructure already grossly overstretched by recent residential developments. It is proposed to be upgraded for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. Classed as urgent, but has not been actioned, despite being oversubscribed, and incapable of serving the impending new housing developments.

Currently there are extreme problems with the electricity grid at Bell Green retail park, with units powered entirely by diesel generators. There are frequent power cuts at the supermarkets, shutting off the fridges and freezers. Existing landowners and developers must cooperate to address the problem in advance of development.

Policy LSA3 Dd urges developers to respond positively to heritage assets and their setting, including the Livesey Hall War Memorial and gardens. This should read the (grade II listed) Livesey Memorial Hall, the Livesey Hall War Memorial, the Livesey Hall's Front Wall, and sportsgrounds. NOT gardens. This aspiration is being undermined by the lack of a Masterplan, which is allowing developers to push for tall buildings in close proximity with the Hall, threatening its viability as our Asset of Community Value. It is also undermining the Agent of Change protection of this important community hall, whose existing use of music, live performance and events for the local community is to be undermined by intensive residential development in close proximity. This will lead to conflict between the existing use and the new residents' quality of life. Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would

like to send a representative to participate in examination hearing sessions.

Site Allocations

SA1: Former Bell Green Gas Holders and Livesey Memorial Hall

SA1's boundary is problematic; two interlocking sites with separate landowners, both currently in the planning system (Apex and Barratt London), plus a third landowner (SGN), currently withholding its land from development. This site allocation policy is not sound, as the omission of the gas pressure station prevents the creation of a coherent street pattern.

The southeast corner is designated as an Appropriate Location For Tall Buildings, despite its proximity to the listed structures of the Livesey Memorial Hall, the most sensitive and heritage-rich section of Bell Green. This proposed designation derives from the site-ownership-based boundaries shown at r18. The poor-quality mapping provided for the Tall Buildings zones, shown in opaque orange, obscured this block's isolation from the rest of the Tall Building zone by the Spine Road, which is a public highway, and a major access road. The relevant section of public highway is included in the r19 site boundary, though it cannot be developed. This isolated block has been overlooked by all but the most intense scrutiny.

SGN provided Lewisham with a plan, offering their gas pressure station area for development, yet their current public stance is that this area cannot be developed for safety reasons. This causes huge difficulties for

the adjoining developments, as cooperation between developers to create a coherent streetscape is non-existent. This piecemeal approach won't build a positive community.

The Apex (Livesey Memorial Hall) site includes a strip of land adjoining the 'British Gas Exclusion Zone' SINC extension, which was assessed as being identical habitat to the SINC and designated in the Parks and Open Spaces strategy 2020-2025 (2020) as natural greenspace (not publicly accessible). Allowing Apex to redevelop this precious natural habitat within a toxic, barren landscape seems inexplicable. The site gradients make the proposed green pathway impossible. The SINC sites were assessed in 2016 and have not been reviewed since. Even in 2016, no site visit was made, and it may have been classified by satellite photography. The report states: "Access to privately-owned sites was not always possible. This was due to a number of reasons including: Dense vegetation next to waterbodies at River Ravensbourneand Pool River Linear Park; combination of field survey, aerial photography and professional judgement was used to determine what habitats are likely to be present in areas not accessible by foot. However, in most cases surveying was possible from publicly accessible vantage points (such as from bridges or adjacent roads or open space." (p.38). Given that best practice is that environmental surveys should be renewed after c. 2 years, the status of the SINC extension, or at least the natural greenspace within the Apex site should be reviewed.

Agent of Change. Policy QD7 Cd. of the LLP says that new noise-sensitive development is situated away from existing noise-generating uses and activities, or, where this is not possible, providing adequate separation and acoustic design measures. The Livesey is a community

hall whose existing uses include live performance, music, and events, which generates a great deal of noise. This is not a problem currently, and the arrival of housing close by will create a great deal of ongoing friction. The site boundary doesn't include the necessary no-build zone to protect the existing use of the Livesey. Agent of Change Policy QD7 Cf. says that development must not prejudice the use of playing fields. The Bowls Green of the Livesey Memorial Hall is currently used as an exercise area for the boxing club, including the youth provision of Knives Down, Gloves Up sessions. It has also been used by Brent Knoll school, a nearby special school with very little outside space, none of which is green. Both these schemes, along with other activities for children and young people, will be threatened by child protection concerns with overlooking from housing blocks.

Conclusion:

In order to make this site allocation sound, its Tall Buildings suitability zone needs reviewing, and robust justification given for its designation. there needs to be clarity over the SGN pressure station's future. It must be included in the design for the site layout, so a coherent street layout can be made. There needs to be a fresh assessment of the British Gas Site Buffer Zone greenspace, and of the greenspace within SA1, omitted from the SINC. The Agent of change aspects of redevelopment must be assessed thoroughly and included in the proposed Bell Green Masterplan.

The Bell Green Neighbourhood Group wishes to participate in examination hearing sessions, as site allocation issues have not been addressed by Lewisham, and they continue to refuse to engage with our community group.

SA3: Sainsbury's Bell Green

The proposed Bell Green Masterplan is needed to address the pedestrian safety issues of traffic bypassing the gyratory system, rat running through Sainsbury's carpark. Improvements in connectivity need to be made immediately to pedestrian access routes, which are currently being poorly served.

SA4: Stanton Square Locally Significant Industrial Site

SA4: This site allocation policy is not sound, as its boundary has not been justified robustly. It includes the local heritage asset of the Old Bathhouse, next to the Bell public house. This is a heritage asset which deserves local listing. Built as public slipper baths by Lewisham Council in the end of the 19th century, it survives with much of its interior intact. It is unthinkable that this should be redeveloped, and no justification is given for its inclusion. There is also no acknowledgement in this allocation of the extent of contamination of the Coventry Scaffolding site, and the wider area from the original gasworks, dating from c. 1850. The safety practices at this date were considerably worse than later, and it continued in gasworks use for many decades.

SA5: Sydenham Green Group Practice

Sydenham Green Health Centre (SA5) is already grossly overstretched due to new developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. Classed as urgent, but not actioned, despite being

oversubscribed, and the impending housing developments.
[Infrastructure Delivery plan].

SA8: Land at Pool Court

Policy SA8 is unsound, as it is ineffective in what it sets out to achieve. The site is unsuitable, being unfit for human habitation due to high risk of regular flooding at the confluence of two rivers. The quality of life is further degraded by being closely bordered by two railway lines. This site allocation fails to address Lewisham's duty to provide a travellers site; what is needed is rather a stopping site. Travellers have crossed the area for at least four hundred years, still do so several times a year, and need somewhere to stop enroute. A tiny residential site doesn't address this need.

EC18 Culture, creative industries and the night-time economy

The Bell Green Neighbourhood Group supports the application being made for a Bell Green Cultural Quarter. The Livesey Memorial Hall has a proud history of live performance, music, and community events, along with art exhibitions and cultural activities. Sydenham Library hosts art studios, exhibitions, and workshops. It is the base for Spontaneous Productions shows being shown in Home Park, next door. Whirled Art Studios has set up a complex of studios on Stanton Island, which were rented out immediately. My Aerial Home is a distinguished studio and school for aerial circus disciplines, based on the Trade City retail park, and Glenlyn Academy is a dance and performance school based on the Home Park Estate. Given the EC18 policy for growing the creative industries as a source of employment in Lewisham, further studios would be a positive use of the heavily contaminated land of the Coventry

Scaffolding yard. Site of the earliest phase of the Bell Green gasworks, the contamination is likely to be very bad, and would be prohibitively expensive to remediate it to the level acceptable for residential use. The Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions on this matter, as it is vital to the development of employment opportunities in Bell Green.

Schedule 1.

Table 21.1 Livesey Memorial Hall should be added to the list of Local Landmarks.

Schedule 2.

Table 21.2 Missing from Conservation Area list - The Thorpes Conservation Area.

Table 21.2 London Squares – Taymount Rise is missing from the list. Fambridge close is NOT the substitute for the designated Stanton Square. Stanton Square was redeveloped without substitution, and restitution attempts are in process.

Schedule 5

Table 21.5 No mention of any retail existing at Bell Green, or on Perry Hill/Catford Hill.

Schedule 6

Table 21.6 Cultural Quarters. Please add Bell Green.

Schedule 11

Table 21.11 Growth corridor - Perry Hill- Catford Hill not listed but shown on Policies Map.

Conclusions on the LLP consultations for the attention of the Planning Inspector:

Consultation on the Lewisham Local Plan has been deeply flawed. Regulation 18 was conducted during the pandemic, with limited communication available. Anyone with difficulty accessing online material was excluded from involvement in the consultation. Regulation 19 consultation has taken place simultaneously with one on the Statement of Community Involvement, and constitutional changes to Lewisham Council's planning arrangements have already been approved by the full council, in advance of the SCI consultation's conclusions. Taking all of this into account, further formal consultation is needed to achieve a common understanding of all the plans and changes proposed. Therefore, the Bell Green Neighbourhood Group concludes that this consultation is not sound, as the draft Lewisham Local Plan is neither robustly justified nor evidence led. The lack of supporting evidence (including the Bell Green Masterplan, the Playing Pitch Strategy and the Physical Activity and Healthy Lifestyles Strategy) means that it cannot be effective in what it sets out to achieve.

In light of these facts, it is clear that the Lewisham Local Plan needs substantial modifications, and the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.

Email from Louise Underwood

Hi there,

I write in Response to r19 consultation on the draft Lewisham Local Plan. I would like to put forward the following objections:

Policies LSA 1, 2 and 3 of the Lewisham Local Plan repeatedly states that developers should follow the Bell Green Masterplan. This has not been produced, and they have prevented local people from creating a forum to start producing a plan ourselves. The missing masterplan, and the lack of robust justification, makes the policies ineffective in what they set out to achieve.

Policy QD4 Building Heights is not sound in relation to the designation of the Building Heights identified for Bell Green and Lower Sydenham in QD4 Part C, and the designation of these areas as a 'Tall Building Suitability Zone', as identified in Figure 5.2 noted in QD4 Part D. This is due to a lack of sound justification and evidence for these designations.

There is not sufficient justification for the Bell Green and Lower Sydenham area to be included as a 'Tall Building Suitability Zone' and all references, including reference in Figure 15.2, should be removed from the prospective Local Plan and the Local Plan Proposed Policies Map. Given this, no heights/maximum heights should be given for this area in the Local Plan and appropriate heights should be determined, as part of the development of a Planning Framework for the area, brought forward by the Council and consulted with the local communities.

I gather that Bell Green Neighbourhood Forum plan to make a submission. I agree with all their views.

Email from Margaret Varley

I would like to express my concern and objections to the proposed developments for Bell Green. There are several proposals that seem unsatisfactory:- The proposed height of 15 storey blocks of flats is too high and will mar the skyline

The buildings appear to be too close to the Livesey Hall Play areas are in shadow Most importantly there seems little attempt to provide the infrastructure needed for such a development - the Bell Green health centre is already overstretched and traffic is often congested in this area I think that the Bell Green Neighbourhood Group should be party to discussions re these plans in order to express local concerns.

From: Residents <SydenhamHillResidents@sydenhamhill.co.uk>
Sent: 25 April 2023 22:55
To: LocalPlan; Frazer, Christopher
Subject: Response to Regulation 19 consultation on LLP

Consultation on Lewisham Local Plan Proposed Submission

RESIDENTS OF SYDENHAM HILL

Thank you for consulting on the revised Lewisham Local Plan Proposed Submission.

On balance, we welcome the proposed principles for celebrating Lewisham's historic environment and ensuring that the significance of the Borough's heritage assets is fully understood, informing the design of development and only supporting development that preserves or enhances the significance of heritage assets and their setting (HE1 A p93). These principles are particularly pertinent to Sydenham Hill.

There is insufficient evidence-led reasoning for some decisions in relation to Sydenham Hill and its ridge. In particular, the failure to evaluate the area's heritage of 18th and 19th century heritage buildings and their relationship to Crystal Palace; the extensive views over London and Kent; and its landscape and woodland character which have determined its contribution to London over centuries.

We welcome the intention in the statements for the West area that "by 2040 the historic fabric, landscape and woodland character will be reinforced so that its neighbourhoods and centres retain their village qualities, including valued views towards London and Kent" (18.6, page 390). Nonetheless, it is disappointing that our requests to have the view from Sydenham Hill Ridge towards the City of London recognised have been overlooked and it continues to be omitted from the tables of London Strategic Views and Lewisham Local Landmarks. We ask for this to be accepted and reinstated (Lewisham Local Views, p802, Table 21.1).

Similarly, we welcome the strengthening of the principles for the preservation and enhancement of non-designated heritage assets (HE3 p. 102), but note that the Council has not taken the opportunity we requested in the last consultation to retain our designation of Area of Special Character, downgrading it to Area of Special Local Character (ASLC). We also note that the Tall Building Review 2023 still has not identified Sydenham Hill as unsuitable for such development despite its designation as an ASLC and the height of the land above sea level. We hope that the Council will cooperate with us to identify our area's qualities with a potential for strengthened area designation.

With regard to HO1 (Meeting Lewisham's housing needs, p.109 ff), we welcome the focus on inclusive and mixed neighbourhoods and communities (page 110) and the recognition in HO1 F that developments which propose an overconcentration of 1 or 2 bedroom units on an individual site should be refused (p111). We have been concerned at the disproportionate increase in approvals for these in recent years, and consequent decrease in family units. It would be helpful to see an analysis of these developments over the last 20 years, compared with previous proportions.

[End]

Email from Eleanor Keech

Hi there

I wish to contribute to the consultation on Lewisham's local plan, specifically the Ladywell Playtower development.

Full name and contact details:

Redacted

I wish to object to this development. The residential properties to be built at the back of the development will severely impede my rights to light and privacy. It will stop daylight from entering my flat. There has been a light study but I and other residents at ***Redacted*** believe this is flawed and request an independent light study be carried out to mark the true difference on the light for ***Redacted*** residents the development will make.

Also my right to privacy will be compromised by having residential properties built so close to mine. The residential development will be breaking recommended levels of proximity by being built so close to our flats. Residents of the new development will be able to see right into my flat, at such close proximity.

For these reasons I cannot agree to the building of residential properties at the back of the Ladywell Playtower development.

Many thanks

Email from Ewa Szczepaniak

Dear Sirs,

Thank you for another consultation option regarding potential Ladywell Play Tower development.

I strongly object to the development.

Myself and few neighbours from ***Redacted***, as well as other blocks and business close by met with architect as well as Councillors to discuss the matter and even invited everyone to our homes so it's apparent that there is a massive lighting issue.

The BRE Guidelines where it states, "the guidelines given here are intended for use for rooms in adjoining dwellings where daylight is required, including living rooms, kitchens and bedrooms.", however, the guidelines continue to comment, "The guidelines may also be applied...where occupants have a reasonable expectation for light."

Therefore, it can be concluded from the above statements from the BRE that the room should be assessed under the BRE Guidelines and arguably designers to have full regard for these targets. The development clearly does not respect these targets for ***Redacted***.

During the visit to our houses, we have asked Mr Mark Batchelor to provide us with drawings showing how specific flats from ***Redacted*** will be seeing new development. We have been told this is possible. However, on 25th July 2022 we have received number of drawings, but not even one was from our building's perspective.

I have emailed back asking for the drawings showing an impact on our building, from both sides of ***Redacted*** and I received a response on 5th October that there is nothing available to show the relationship with ***Redacted***.

I have asked a few times for the council/ developer to agree coverage of the independent surveyor. I would really like to invite someone over to do the light testing.

My apartment is North facing one and I barely get a good sunlight now. With 3 storey building being put in front of my windows I won't be getting any.

This is an additional point to the previously raised point that the proposed development and ***Redacted*** are below the recommended distance levels.

I insist to get an agreement to appoint an independent surveyor of residents' choice to conduct necessary checks. I estimate costs of up to £2,500 (net).

Another issue with the development is privacy of the residents of ***Redacted***. We strongly believe, judging from the available drawings, that circa 50% of the residents of ***Redacted*** will lose their privacy and won't be able to have their bedrooms curtains open most of the time. We need to remember that we have number of children living in ***Redacted***.

We also would like to remind you, that when ***Redacted*** was being developed there was a promise that no other development will stand in front of it. This was the agreement Purelake (original developer) had with

the Council. Some of us purchased the flats based on this information. I do appreciate it was a decade ago but original residents are still here and this promise should be valid.

To end the objection, I would like to repeat that the destruction of number of mature trees is absolutely unacceptable.

Kind regards,

Ewa Szczepaniak

Email from: Monika Nadolny

Subject: Objection - Ladywell Play Tower

Dear Sir/Madam

I am writing to strongly object to the development of Ladywell Play Tower.

Myself and few neighbours from ***Redacted*** have written to the Council a number of times and we still believe that our objections are valid, and that the development should not take place.

We have had local councillors at our flats so they could see how badly privacy and lighting of our flats will be affected.

I have ***Redacted***. Something I strongly object to. Also, my bedroom would face the same problem. I would need to keep my blinds shut in order to carry out daily routine.

My neighbour asked for an independent survey as we all believe the findings in yours are incorrect. We are still waiting for an agreement to appoint anyone.

I also believe, it was already raised that development would cause more pollution, especially with well aging trees removed, as well as disturb local animals.

Kind regards,

Monika Nadolny

Redacted

From: Stacey Lockyer [REDACTED]
Sent: 25 April 2023 22:45
To: Ewa Szczepaniak
Cc: LocalPlan; [REDACTED] Planning; Committee
Subject: Re: Reg 19 Consultation - Ladywell Play Tower

Dear Sirs,
I'd like to second Ewa's email.

I live [REDACTED] and I already have to have lights turned on at all times of the day due to the lack of light caused by the wall surrounding the building.

I also work at home some days as many people do now which means I am based in the living room for 8 hours/day working and a further reduction in light would therefore be intolerable and reduce my quality of life and the value of my property.

I also second Ewa's point regarding the trees. At present birdsong can be heard within my flat and this would disappear should the trees be removed. The current view from my patio would also change from blue sky and a church to tall buildings, making it feel more enclosed.

Overall I strongly object to the development.

Regards,

[REDACTED]

On 23 Apr 2023, at 17:05, Ewa Szczepaniak [REDACTED]

Dear Sirs,

Thank you for another consultation option regarding potential Ladywell Play Tower development.

I strongly object to the development.

Myself and few neighbours from St Peters Gardens, as well as other blocks and business close by met with architect as well as Councillors to discuss the matter and even invited everyone to our homes so it's apparent that there is a massive lighting issue.

The BRE Guidelines where it states, "the guidelines given here are intended for use for rooms in adjoining dwellings where daylight is required, including living rooms, kitchens and bedrooms.", however, the guidelines continue to comment, "The guidelines may also be applied...where occupants have a reasonable expectation for light." Therefore, it can be concluded from the above statements from the BRE that the room should be assessed under the BRE Guidelines and arguably designers to have full regard for these targets. The development clearly does not respect these targets for St Peters Gardens.

During the visit to our houses, we have asked [REDACTED] to provide us with drawings showing how specific flats from St Peters Gardens will be seeing new development. We have been told this is

possible. However, on 25th July 2022 we have received number of drawings, but not even one was from our building's perspective.

I have emailed back asking for the drawings showing an impact on our building, from both sides of St Peters Gardens and I received a response on 5th October that there is nothing available to show the relationship with St Peters Gardens.

I have asked a few times for the council/ developer to agree coverage of the independent surveyor. I would really like to invite someone over to do the light testing.

My apartment is North facing one and I barely get a good sunlight now. With 3 storey building being put in front of my windows I won't be getting any.

This is an additional point to the previously raised point that the proposed development and St Peters Gardens are below the recommended distance levels.

I insist to get an agreement to appoint an independent surveyor of residents' choice to conduct necessary checks. I estimate costs of up to £2,500 (net).

Another issue with the development is privacy of the residents of St Peters Gardens. We strongly believe, judging from the available drawings, that circa 50% of the residents of St Peters Gardens will lose their privacy and won't be able to have their bedrooms curtains open most of the time. We need to remember that we have number of children living in St Peters Gardens.

We also would like to remind you, that when St Peters Gardens was being developed there was a promise that no other development will stand in front of it. This was the agreement Purelake (original developer) had with the Council. Some of us purchased the flats based on this information. I do appreciate it was a decade ago but original residents are still here and this promise should be valid. To end the objection, I would like to repeat that the destruction of number of mature trees is absolutely unacceptable.

Kind regards,

Ewa Szczepaniak

[REDACTED]

Email From Alan Turpin
Slaithwaite Road proposals -

As a resident of ***** **** I wish to object to the demolition of the respite care facility at 47 Slaithwaite Road. Your plan says it is a respite care unit when in fact it has been closed for many years and these proposals look like they are part of the long term plan to run down disabled services to the bare legal minimum. This area has seen the establishment of a Priory clinic in place of an old people's home, the establishment of the Citizens Advice Bureau in a large part of the Leemore Centre, the closure of the Community Hall facility along with the curse of being in the middle of a low traffic zone, which has brought an increase in nuisance parking, and your proposal is to stuff fifty-two more dwellings into the area without any mention of an increase in amenities for local residents. I have no doubt that you will ignore my objections.

Email from Andrew Moran

Objection to Development of House on the Hill site, 47 Slaithwaite Road, SE13 6DL

To whom it may concern,

I am emailing to register my objection to the proposed development of the House on the Hill site at 47 Slaithwaite Road, SE13 6DL on the following grounds:

- the loss of the current building which is designated for community use.
- the previous already excessive proposal of 36 residential units has now been increased to 52.
- An increase in the local population would further add to existing pressure on parking spaces, traffic, vehicle movements, pollution and noise on and around Slaithwaite Road.
- A development of potentially 6 storey's high would result in the ambience and character of the area being lost in the name of profits for developers charging extortionate rents for properties not targeted at those most vulnerable in the current housing crisis.
- An increase in the local population will also place further pressure on already stretched GP, dental & hospital services.
- the disruption caused to residents during demolition and construction of the proposed structure in the form of dirt, dust, noise and heavy vehicles.

regards, Andrew Moran

**Email from Benjamin Whateley
House on the Hill development –**

Hello

I am a resident of the borough of Lewisham. I live on [REDACTED]
[REDACTED] my name is Benjamin Whateley and I am **opposed** to the development of the House on the Hill in total, let alone from 36 to 52 units.

The rate of development within the area is already dwarfing the landscape and pollution in Lewisham is a problem that this development will only exacerbate. The development of private housing in an already overdeveloped area is one I expect to be duly notified and consulted with, as a resident of Lewisham.

This particular development will eradicate a building dedicated to care and outreach programs, how is it justifiable to replace such necessary resources with private accommodation?

As a resident of Lewisham I would like to know how you plan to rectify the lack of clear consent with the community.

Email from Carl Hendrickse

Objection to proposed planning to 47 Slaithwaite Road SE13 6DL

Dear Sir/Madam,

I am writing to you to object in the strongest possible terms to the planning permission granted for the proposed development at number 47 Slaithwaite Road, (House on the hill) Lewisham SE13 6DL, London.

The recent increase in the number of residential units from 36 to 52 is unacceptable and will have a severe impact on the community in the area. The increased car traffic on already congested roads will create a hazardous environment for pedestrians and drivers alike. The addition of a new hotel, church, and nursery has already made this problem worse, and it is vital that further strain on the infrastructure is not introduced.

Furthermore, the loss of a community building is a significant concern, and the development will place immense pressure on GP and dental services in the area, as well as local hospitals. The character of the area will be irrevocably changed, and the proposed development will cause a significant amount of disruption, including the dirt, dust, and noise that goes along with a large construction site.

I implore you to reconsider the granting of planning permission for this development. The detrimental impact on the community, the environment, and the local infrastructure cannot be overlooked, and it is essential that these concerns are addressed before any further action is taken.

Thank you for your attention to this matter.

Sincerely, Carl Hendrickse

Local resident

Email from Dalia Smaizyte

**The objection for house of the hill- 47 slaithewaite road se13 6dl
project proposal**

Dear Sir/Madam,

I am writing to you to object in the strongest possible terms to the planning permission granted for the proposed development at number 47 Slaithwaite Road, (House on the hill) Lewisham SE13 6DL, London.

The recent increase in the number of residential units from 36 to 52 is unacceptable and will have a severe impact on the community in the area. The increased car traffic on already congested roads will create a hazardous environment for pedestrians and drivers alike. The addition of a new hotel, church, and nursery has already made this problem worse, and it is vital that further strain on the infrastructure is not introduced.

Furthermore, the loss of a community building is a significant concern, and the development will place immense pressure on GP and dental services in the area, as well as local hospitals. The character of the area will be irrevocably changed, and the proposed development will cause a significant amount of disruption, including the dirt, dust, and noise that goes along with mass construction sites.

I implore you to reconsider the granting of planning permission for this development. The detrimental impact on the community, the environment, and the local infrastructure cannot be overlooked, and it is essential that these concerns are addressed before any further action is taken.

Thank you for your attention to this matter.

Kind regards,

Dalia Smaizyte, Local resident.

Email from Daniel Gibbs and Sophie Hornby.
Objection to House on the Hill, Slaithwaite Road

Hi there,

I am writing to you to object to the development being proposed on the House on the Hill site, Slaithwaite Road.

Reason being that sunlight to our property (both garden and into a bedroom) would be blocked by the height of the building. This would be particularly detrimental to us as our property receives minimal direct sunlight other than via these routes. The proposed construction would block 80%+ of the sunlight we receive.

It would also impact the privacy of said bedroom and garden, which would be overlooked.

This is in addition to the strain that would be put on local services.

Our address is [REDACTED]

Yours sincerely,

Daniel Gibbs and Sophie Hornby

Email from Dean Pignon

Comment on the Lewisham Local Plan

Dear Sir/Madam,

I would like to ask you to take some views into consideration when evaluating the proposed redevelopment plan of 47 Slaithwaite Road / 36 Clarendon Rise, SE13 6DL, referred to in the Lewisham Local Plan on page 484 as “10 House on the Hill at Slaithwaite Road”.

I am a local resident near to the property due for redevelopment. While I broadly support bringing the property back into use, and acknowledge the urgent need for more housing in London, I would like to ensure that any development is done with quality in mind, not just quantity, and that it does not damage the local environment. To that end please consider the following points:

1. There are a number of mature trees on the site which should be retained, especially those on the edges of the property along Slaithwaite Road, Clarendon Rise and Limes Grove. Do these trees have protection orders assigned already? If not then I would like to lobby that they **do** receive protection and that such protection be **monitored and enforced** when the demolition and construction contractors move in. Some developers have a habit of “accidentally” damaging things they’d rather get rid of!

These trees have been there for a long time and it would take decades for any replacements to grow. In the meantime the pleasant character of the road would be very negatively affected.

2. There are wild primroses on the property that should be also be preserved. Note that they are protected by law. If it is not possible

to preserve them then they should be transplanted into the nearby Gilmore Park for example.

3. Even though the current property is officially vacant, there may nevertheless still be a few homeless/vulnerable people making use of it. Please ensure that these are identified and relocated to suitable safe alternative accommodation.
4. 52 new households on the site may result in a significant parking problem in the immediate area, which already gets quite full at times, especially on some weekends when there are nearby church services or other events. Please consider mandating underground car parking to be constructed in the basement of the new housing block. This is common practice in some other places.

In addition, there is actually some empty space on the adjoining sections of Slaithwaite Road, Clarendon Rise and Limes Grove that could be repurposed for on-street resident's parking. In fact, Clarendon Rise in particular is rather wide along that stretch, and has no through traffic, so the roadway could be narrowed to make space for perpendicular parking (i.e. park with the car facing the pavement, at a right-angle to the road) instead of the current horizontal bays, which should allow for double the parking spaces in the same area.

5. Please make sure that what gets built is architecturally pleasant/interesting to look at, clad in quality long-lasting materials, and not just yet another ugly square block that will become a cheap-looking eyesore in 10 years' time! If it wouldn't be good

enough for a quiet residential street in Hampstead, Chelsea,
Blackheath or Dulwich then it shouldn't be in Lewisham either.

Yours Sincerely, Dean Pignon

Email from Elisabeth Grellet

Objection to development of House on the Hill

As a local resident on [REDACTED] I strongly object to the planning of developing 52 units. Lewisham doesn't need anymore high buildings.

House on the Hill should remain a community building and keep its existing gardens and size.

It is a quiet area, close to the centre and should be kept this way.

Best regards, Elisabeth Grellet

Email from Emma Davis

Major Development of House on the Hill, Slaithwaite Road.

To: The Planning Service, (Laurence House)

I wish to object to the proposed development of converting House on the Hill into 52 or even 36 residential units on the grounds that this development will have an all round detrimental impact on the surrounding locality.

There are already enough properties including converted houses and flats crammed into the vicinity of Slaithwaite Road. We can not sustain a larger population without huge environmental burdens including pollution from more cars, and noise pollution from cramming lots of residents into a small contained space.

We are already experiencing problems with the overspill from the new Travel Lodge which has made the area a lot more busy. Also the car park becomes very shady at night times with drinking and drug use which impacts residents who overlook the car park and residents walking home to all the surrounding roads. We don't need more people residing or hanging about in the area. Also the proposed development of 6 storeys is simply not in keeping with this green, conservation like area. It will be an eyesore.

I demand that this proposed development is abandoned immediately.

Yours faithfully, Emma Davis

Email from Filomena Dellamura

Reg 19 consultation

47 Slaithwaite Road - The House on the Hill

I object to the proposal to bulldoze the existing community service building and replace it with a large residential development! The single storey building currently on the site previously provided a day centre and respite care centre for children. My view is that it should be refurbished and put to some similar use.

It is unclear who will benefit from this development (other than the developers). The proposed 52 units are intended to house over 180 people. That will virtually double the current population of Slaithwaite Road with no proposed increase in infrastructure to support it. It is already difficult to get an appointment at the local GP surgery and the hospital services are under extreme pressure.

To get 52 units (mixture of 1, 2 and 3 bedroom units) they must be at pretty minimal space standards and that's not healthy. A 3 bedroom property to house 5 people? How does that work for a family?

This will potentially put another 50+ vehicles on to our local roads and in our resident's parking bays. We already get enough incoming vehicles from the Travelodge Hotel and on Sundays our streets are completely jammed full with parked cars from worshippers attending the new nearby church. My view is that all of the parking bays in the surrounding roads should be designated as 24 hour residents only and crucially the development itself must be **car-free**.

I am a life-long Lewisham resident and have lived in ***** since *****. A huge 5-6 storey building on what is currently an open site with

grass and mature trees and shrubs will completely spoil the character of the area. No new building should rise above the height of the existing buildings (like that awful lump of a hotel) and shouldn't look into or over current resident's homes and gardens.

Luckily my husband became aware of this consultation and if he had not told me I (along with my neighbours) would not even have known about this potential blight on our lives.

I strongly object to the proposed development of the House on the Hill site at 47, Slaithwaite Road.

Filomena Dellamura

Email from Gus Newman

Objection to House on the Hill, Slaithwaite Road planning proposal

I am writing to formally object to your plan for the House on the Hill at Slaithwaite Road.

The site is currently an open area with a good deal of greenery and trees with a single-story building occupying some of the site. the adjacent buildings are two stories and include many Victorian buildings. the plan to turn this into multi story residential units will not fit into the local environment and will have an impact on the local environment will negatively effect the lives of residents in the local community.

the previous plan was to put 36 residential units on the site but now, despite multiple objections from local residents, this has increased to 52 units.

the plan has been designated as “vehicle light”, though your previous efforts to reduce vehicle usage have not been effective and have had a negative impact on congestion and pollution, e.g. the Tab church on Lewisham High street and the local LTN. The situation will be considerably worse with the additional vehicles associated with 52 new residential units. The area is already blighted by the lack of parking for the church, the nursery in Morley Road and the new hotel on the high street. Also, the proposed development would have a negative effect on the already overstretched dental, GP and Hospital services

in addition, it is hard to believe that fitting 52 residential units on a site this size would provide decent family accommodation, something the borough actually needs.

For the reasons outlined above I strongly object to this proposal.

Email from Katrine Moeller

**Comment and objection to development plan for House on the Hill
(47 Slaithwaite Road, SE13 6DL)**

I hope you are well.

I have very recently become aware that planning permission is being sought for a development *****, and that the consultation ends today. This comes as a great surprise to me - there is no signage I can see regarding this by the building proposed for development, nor have we been made directly aware at our address. In short, I do not think that I or my fellow residents have been given a reasonable chance to respond to this proposed development, which will have a massive impact on our lives here, both during a building process and onwards. I have learnt that your only response to previous opposition was to majorly increase the number of proposed dwellings on the site.

As I have been informed, the House on the Hill, an already-in-use building with valuable old trees and varied greenery surrounding it, is proposed to be turned into, or replaced with, 52 housing units at up to 6 stories height. This in itself would be an incredible architectural and social imposition on a road with otherwise small to medium dwellings, adding noise and pollution to a functioning community without any care for both current and future residents.

As you may be aware, there are many strained capacities in place in our area. Every Sunday, church goers flock to Lewisham in their cars, and Slaithwaite Road on those days has unending lines of illegally parked cars along every inch. Any significant increase in housing density on our road will add to this issue significantly, regardless of any intention to not prioritise cars in the development.

The House on the Hill is home to many old trees that slightly lessen the impact of these masses of traffic, recently also added to by the new travelodge.

The House on the Hill is home, also, to valued neighbours who leave the garden green and flowering and a rare local haven to varied wildlife. The house has clearly been built for community usage, making any planning decision - of such a radical departure from the surroundings as what is here proposed - particularly egregious. That it is happening without appropriate, open consultation with residents is simply upsetting.

I have lived here for *****. I am a nerd who reads signs I see in the street - a flyer from my neighbours is the first I hear of this proposal. I strongly oppose it in its current form, and urge that you reconsider and find a use for this property that respects the surroundings; the address' value as green space in a city where your prior developments have pushed further pollution up this particular street; and the impact the shape of your development will have both on the people who have their lives here, and the people you want to build theirs here in future. It is, simply put, too careless and too large for the locale.

The House on the Hill is a valuable space for those who live there, and their neighbours. I welcome additional housing, but wish for it to be housing which will not reduce the welfare it is possible to experience within and outside its doors, as I see this proposal doing.

Again, I cannot stress enough how incredibly disappointed I am that such a major development is happening without properly informing local residents, and allowing us our democratic right to be involved in the shape of our community.

Best regards,

Katrine Moeller, Long term tenant

Email from Kieran Turner

Hi,

I am a resident of Lewisham (***** Road), and saw with dismay that there are plans to build on Slaithwaite Road.

It looks like despite local objections the proposed development has INCREASED in size to 52 units.

There is already SO MUCH construction that I cannot see the need to build on every single spare plot of land and space in the borough.

With the HUGE number of flats being built, is the Council investing more into local services? Are there going to be more trains running?

We also are lucky enough to live in a LTN – will this change with another (potential) 52 cars needing to park nearby?

If the building is extended to 6 storeys as is rumoured, this would have a huge impact on the local area – as all the houses nearby are a maximum of 3 stories.

And of course, as it is at the top of a hill, it would seem even taller.

At some point, this rampant housebuilding in Lewisham has to end. It is already blocking out the sun on many parts of the walk to Lewisham station, and there does seem to be an obsession with building on every single square foot of land.

Please re-consider this proposal.

Thank you,
Kieran

Email: Ljubica Milosevic

Dear Sir/Madam,

I am writing to express my strong objection to the proposed housing development of 52 units at 47 Slaithwaite Road, SE13 6DL.

My objections are based on several grounds, including the potential impact on the environment, erosion, traffic pollution and the quality of life of local residents.

Please ask yourself if building a high scraper on the top of the hill is reasonable.

(Existing residential houses will be in direct danger of land erosion.)

Thank you for considering my objections.

Sincerely

Ljubica Milosevic

Email from Manpreet Rai

Hello,

I am concerned about the development proposed for House on the Hill, Slaithwaite Road. Please can you confirm how high the development will be?

Tks,

Mani

Email from Mladen Milosevic

Dear Sir/Madam,

I am writing to express my strong objection to the proposed housing development of 52 units at 47 Slaithwaite Road, SE13 6DL.

My objections are based on several grounds, including the potential impact on the environment, erosion, traffic pollution and the quality of life of local residents.

One of my major concerns is the potential environmental impact of the proposed development.

The development will require the removal of large trees and green spaces, which will have a negative impact on the local ecosystem and biodiversity.

Furthermore, the removal of large trees could also lead to increased ground movement in the area.

Trees play a crucial role in stabilizing the soil, and their removal could lead to soil erosion and instability. This could result in ground movement, which would have severe implications for the structural integrity of nearby buildings and roads.

In addition to these concerns, the proposed development may also have a negative impact on the local sewage and water system. We are already experiencing poor water pressure at our property. The proposed development will significantly strain the existing sewage and water system.

Also, the proposed development will increase traffic pollution. The additional cars on the road will result in increased emissions, which could have a negative effect on the health of residents, particularly those with respiratory conditions.

Because of these concerns, I would like to ask you to reconsider the proposed development at 47 Slaithwaite Road, SE13 6DL and NOT to go ahead with such a large project of 52 units.

The negative impact on the environment, public health and quality of life for local residents far outweigh any potential development benefits.

Thank you for considering my objections.

Sincerely,

Mladen Milosevic

From: Natasha Held <[REDACTED]>
Sent: 24 April 2023 19:46
To: LocalPlan
Cc: [REDACTED]
Subject: Lewisham Local Plan - House on the Hill, Slaithewaite Road, pp. 486-487

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Lewisham Local Plan

I live at [REDACTED] opposite part of an area I understand has been flagged up for potential redevelopment into 52 residential units in the Lewisham Local Plan (House on the Hill, Slaithewaite Road, pp. 486-487).

It has been extremely distressing to witness the state of managed decline of a well designed and built existing single storey structure on this site which formerly provided assisted housing for vulnerable people.

If Lewisham Council is in desperate need to build new social accommodation; then I can appreciate how this plot of land appears underused. However, there is understandable concern from local residents regarding the impact that it is going to have on them with regard to reduced light, increased traffic, loss of beautiful blossom trees and the possibility of a new building that is a visual blight rather than an asset to the area.

I would like to have reassurance that:

1. Going forward, local residents will be consulted directly with on the scope and tender process of the design.
2. The scope for the building will not just be dictated by cost, but also factors of best use, appearance, materials, longevity and the environment.
3. The new building will:
 - 3.1. continue to be for community use/benefit - ideally for either assisted or social housing?
 - 3.2. not rise higher than the existing buildings around it.
 - 3.3. be designed to high standard and with sensitivity to its surroundings and the occupants. I.e. If there is not enough space to fit 52 apartments healthily into a three storey building then the number should be reduced.
 - 3.4. continue to be landscaped and inset away from the street. All good social housing blocks in the past have benefited from this. It gives all residents increased privacy and an elegance to the building, as opposed to current developer tendency to build right up to the pavement.
 - 3.5. keep a good proportion of the existing trees (it is not the same to replace a mature tree with a young sapling which does not have the same capacity for absorbing carbon dioxide and especially if those saplings are not going to be properly maintained).

With thanks in advance for your time and response,

Natasha Held



Lewisham Local Plan - House on the Hill, Slaithewaite Road, pp. 486-487

From: Natasha Held [REDACTED]

To: localplan@lewisham.gov.uk

Cc: [REDACTED]

Date: Monday, 24 April 2023 at 18:45 UTC

*Your email box refused delivery
(see attached)*

Dear Lewisham Local Plan

I live at [REDACTED] which is [REDACTED] area I understand has been flagged up for potential redevelopment into 52 residential units in the Lewisham Local Plan (House on the Hill, Slaithewaite Road, pp. 486-487).

It has been extremely distressing to witness the state of managed decline of a well designed and built existing single storey structure on this site which formerly provided assisted housing for vulnerable people.

If Lewisham Council is in desperate need to build new social accommodation; then I can appreciate how this plot of land appears underused. However, there is understandable concern from local residents regarding the impact that it is going to have on them with regard to reduced light, increased traffic, loss of beautiful blossom trees and the possibility of a new building that is a visual blight rather than an asset to the area.

I would like to have reassurance that:

1. Going forward, local residents will be consulted directly with on the scope and tender process of the design.
2. The scope for the building will not just be dictated by cost, but also factors of best use, appearance, materials, longevity and the environment.
3. The new building will:
 - 3.1. continue to be for community use/benefit - ideally for either assisted or social housing?
 - 3.2. not rise higher than the existing buildings around it.
 - 3.3. be designed to high standard and with sensitivity to its surroundings and the occupants. I.e. If there is not enough space to fit 52 apartments healthily into a three storey building then the number should be reduced.
 - 3.4. continue to be landscaped and inset away from the street. All good social housing blocks in the past have benefited from this. It gives all residents increased privacy and an elegance to the building, as opposed to current developer tendency to build right up to the pavement.
 - 3.5. keep a good proportion of the existing trees (it is not the same to replace a mature tree with a young sapling which does not have the same capacity for absorbing carbon dioxide and especially if those saplings are not going to be properly maintained).

With thanks in advance for your time and response,

Natasha Held

*Please add my details to
Your 'consultation database'*

24/04/2023, 18:45

Email from Niki Sharp

To whom it may concern,

We would like to strongly oppose the proposed residential development at 47 Slaithwaite road (the House of the Hill).

The council previously consulted on a 36 unit development on this site (which we also opposed) and is now conducting a further consultation for 52 residential units to be built in the next five years. We are extremely disappointed to see that, not only was our earlier submission clearly dismissed but that Lewisham Council has decided to substantially increase the number of units from 36 to 52 (over a 40% increase) and is intent on building these units imminently.

Fundamentally, this development will result in great loss to the immediate and wider local area. At present, we understand that the site is used for community benefit and is listed in your plans as an overnight stay respite centre. Services such as this are vital for Lewisham and, given the lack of existing provision for a number of community services, should be supported and augmented rather than removed. For example, as a new mother, I noted the lack of a Children's Centre in central Lewisham for accessing services such as breastfeeding support. Instead, I had to travel to attend drop in centres in Catford, Ladywell or Deptford - something which was often difficult to do.

Moverover, the existing services such as GP, dental, transport, parking, schooling, utilities, supermarkets, etc in Lewisham are already incredibly stretched. For example, I have struggled to find a local dentist since moving to Slaithwaite road over two years ago. One surgery I spoke to explained that they have been unable to take new NHS patients for at

least the past four years due to oversubscription. As a further example, we have had difficulties with water pressure in our house in the past year. A technician from Thames Water assessed our property and advised that in part, this resulted from new developments diverting some of the existing pressure. Introducing additional properties can only enhance these issues. As a final example, parking pressures clearly exist in this area as the lower part of Slaithwaite road is often incredibly busy at peak times e.g. Church or nursery pick-ups. Each of these examples demonstrate that introducing residents for 52 (or even 36) new units would only exacerbate an already difficult situation.

Further, it should not be forgotten that these services are already stretched at a time when a series of new developments near Lewisham station are nearing completion and several other sites in central Lewisham are being examined or consulted on for development. Once fully occupied, these flats will place even more pressure on the local area. Similarly, they will greatly affect the character and functionality of the neighbourhood by introducing comparatively high rise buildings and a significant increase in population to a previously calm and quiet residential area with no existing buildings over three storeys and where the previous site was only one storey high.

Finally, introducing a residential development, particularly one of this size and height, will result in a loss of privacy, increased noise and/or potentially creates a nuisance for existing residents such as ourselves. This is not only while the units are being built (which will be incredibly disruptive to our day-to-day lives) but also once the units are in place and occupied. As well as the stark increase in population to the local community, given our position ***Redacted****, this new residential structure could introduce flats that will ***Redacted**** on that side of

Redacted. We will also lose our existing view of ***Redacted***. Again, this is exacerbated by the Council amending its proposal to build 52 units which we assume will result in a higher structure than the previous 36 and take longer to build.

While we understand the need for Lewisham Council to build additional housing, including as a result of the targets imposed on the Council, this needs to be done with sensitivity to the areas where new housing is introduced and with a strategic approach to planning for all of Lewisham. Removing community services, irrevocably changing the character of the area and placing additional burden on already struggling services to build a large development of residential units simply does not achieve this.

We therefore recommend that the proposal to build 52 (or 36) units at 47 Slaithwaite road is abandoned and the site is instead invested in as a community space. We would be happy to discuss the proposals further with you.

Best wishes

Niki Sharp

Email from Paula Mitchell

To Planning Services Lewisham Council

Please see attached for comments re the above planning proposal.

Yours sincerely

****Attachment****

HOUSE ON THE HILL SITE PROPOSAL.

18th April 2023

We are pleased to have another 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.

Please note - it would be courteous to spell the name of the actual road correctly on your document. Considering the potential impact this proposed development will have on the current residents, that you can't even use the correct road spelling, gives the impression of disregard and a disinterested council going through the motions.

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 plan now suggests that the site may be used for 52 mixed residential units. What does that mean? Are these all affordable/social? It is very worrying that the Council response to the last resident consultation, is an increase to the number of units originally proposed, from 36 to 52! It conveys the feeling that

residents concerns of the negative impact this development will have on our environment are being totally ignored.

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 are similar to our last response and include:

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 is a relatively new Travel Lodge and Church at the bottom of the road, both of which have no apparent parking facilities. This has recently introduced even more non residential traffic into this area, and exacerbated the traffic pollution issues.

What parking facilities will be provided for the additional units proposed for the House on the Hill development?

This area has a large diverse community. When nine-year-old ***Redacted***, 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 were very disappointing. Too often the local public support for the measures are overshadowed by a small group of more vocal opponents, who are not local residents.

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? This would help make the area a more liveable and healthy neighbourhood.

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.

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. We note that the 'trees of quality on this site' are referenced in the proposal, and it states that those particularly on the boundary 'MUST be retained'! Why not use this rare green area in central Lewisham to meet the A21 corridor aims of maximising ... 'urban greening measures'.

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?

Thames Water seem to be constantly attending sewer or pipe/water

pressure difficulties in this area. Inevitably adding this building will exacerbate the current situation.

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.

Notification of proposed work:

Lastly, the way this proposal was advertised is AGAIN 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.

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.

Even though we received a copy of the local plan online, it is a very dense document, and identifying any proposals buried on page 453 a significant task. Additionally, much of the language used is procedural and opaque, and very unclear.

In summary, we are incredibly disappointed to see that the proposal is to build on the footprint of the House On The Hill rather than the development and inclusion of a much needed green space accessible to all.

During the pandemic local residents came 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 would like clarification how this proposed building will be designed to respond positively to the character of the area, and what the height restriction will be, as no current local building exceeds 3 stories. Based on the unsympathetic and indifferent architecture seen in the Gateway development, I hope local residents will be able to contribute to any design proposal.

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.

Email from Richard Hallam

Re Proposed House on the Hill development, Slaithwaite Road.

I wrote to object to an earlier proposal on this site over a year ago and feel even more strongly about this one, especially as it proposes even more housing units. As far as I can see from the plans, every square inch will be covered with bricks, asphalt, or concrete. At present, there is only one large single story unit on the site in leafy surroundings, a welcome relief for local residents.

In closing off roads, Lewisham's recent policy has been to make the environment more pleasant to live in. This development will have the opposite effect. Since moving here in 2000, almost every spare patch of land in Central Lewisham has been built on, much of it with high rise apartments. The proposed development is another example, leading to an unacceptable population density in this residential area. It will degrade the local environment and I strongly object.

Richard Hallam

Email From Richard Stableford

To Lewisham Planning Service,

I wish to register my objection to the proposed development of The House on the Hill, Slaithwaite Rd. SE13.

I object that 52 residential units are proposed on this site. This is a significant increase from the 36 units that were initially proposed and will have a detrimental effect on the local area including local wildlife.

I cannot see how 52 units can be built , without having 6 storey towers. This will block out daylight for local residents .

The site is also a wildlife haven for birds and animals (including woodpeckers ducks and foxes) , with good variety of trees and fauna for wildlife to thrive in. Any development will be a threat to this.

I also object because the development will mean I will lose my privacy, as I live *****Redacted*****. It will have a negative impact on the local character.

Please consider my objections at the planning meeting / consultations .

Email from Russell Woolley

Hi,

I understand that there is a consultation over a proposed development at 47 Slaithwaite Road, SE13 6DL, with the plan to build a six-storey development of 52 residential units. I live on *****Redacted*****, and I object to any plan to build a six-storey building on this road. Put simply, six storeys is far too high.

Slaithwaite Road is a residential side-road with many period Victorian houses. Adding a six-storey block of flats to this road would significantly disrupt the character of the road - it would look ridiculous so close to the Victorian houses. It would also set an alarming precedent, where apparently any large block of flats can be built on any side road, regardless of the effect on the character of the road.

Moreover, adding 52 units to a road with already very limited parking is going to cause serious issues. There are already fights breaking out on Sundays when the parked cars from the churchgoers block up all the nearby streets, so adding more to that is only going to make things worse.

To be clear, I see no reason why a modest development should not be made at 47 Slaithwaite Road, but it should certainly be no higher than the nearby houses. Six storeys is indefensible.

Please confirm that my objections to the proposed development have been noted.

Kind regards,

Russell Woolley

Email from Shashank Virmani

Dear Lewisham Planning

I believe that there are plans to build residential accommodation at the corner of Clarendon Rise/Slaithwaite road.

I live at *****Redacted*****.

I am concerned that if the building is too high, and not planned appropriately, then there will be problems such as

1. Obstructions to the light we and our neighbours receive.
2. Our privacy will be affected as a high development will be able to look into our rooms, especially those of our child and our neighbours children.
3. There will be an increase in traffic and pressure on parking in the street.

Please ensure that any development does not raise the height of the building as it stands.

best wishes
Shashank

Email from Su Baker Bates

Please find attached letter Re: 10 House on the Hill, 47 Slaithwaite Road SE13 6DL

*****Redacted*****

REF: proposed development at 47 Slaithwaite Road, SE13 6DL

If my information is correct with reference to the proposed development at 47 Slaithwaite Road, SE13 6DL. (Lewisham local plan p.486), I would like to make the following comments.

1. In view of the architectural nature of the area, any construction greater than 2 or 3 stories will result in a building higher than those around and negatively change the appearance of the neighbourhood.
2. What arrangements are to be made or provision made for the vulnerable people catered for by the existing property? Note that the demand for such provision will inevitably increase in the near future. Why lose a current provision that is so badly needed.
3. I understand the terms "car free" and "car light" are used in reference to the proposed block of flats. This surely means lack of parking spaces for the residents and thus some 40 or so additional cars parked in the local streets. This will greatly exacerbate the present difficult parking situation.

I submit these comments for your consideration for including in the next stage of the planning process. I personally, would like to see a low rise development that would include social provisions as now, affordable renting for our service providers, private housing and some car parking facilities.

Mrs S Baker-Bates

Emails from Tanya Woolf

Dear Team

Somewhere in your local plan published for the A21 but not shown clearly in your latest documents for the Local Plan just published, you are proposing the removal of the car park at Slaithwaite Road / Clipper Way. Please be aware of the terrible problems of parking in the area particularly on Sundays when the new church has services "The Tab" where the area is jammed up with inconsiderately and often illegally parked vehicles that church visitors attend in between the hours of approximately 10.30am and 1.45pm. Please see all my earlier emails below.

While I have responded online to your survey as a resident in one of the streets affected, I have only just become aware of the terrible idea buried in the multiple lengthy documents that you issued that you/Lewisham Council plan to get rid of the Clipper Way/Slaithwaite Road car park and build a 6 storey building on it.

Please register my strongest protest at his irresponsible plan. It is one of the few car parks in easy reach of the shopping centre, new church near the fire station, new hotel and all the new high rise developments under construction. It is a fantasy that getting rid of parking facilities will mean people stop using cars. Our experience as local residents is that people constantly park dangerously/illegally in local streets as soon as parking restrictions go off. This is particularly the case on a Sunday between

about 11am-1pm during the main church service. Cars/vehicles block dropped curb access, blocking residents parked on their drives, park on street corners impeding access and safe views to road turns and there are regularly shouting matches between drivers of vehicles attempting to pass one another. This is happening when the car park is **in use and is full**. Think how much worse this will be when the parking spaces from the car park are no longer available. Where will church goers and hotel residents park? I repeat: it is a fantasy to believe people will “stop using their cars” and it is unreasonable and unjust to expect the local residents to pay the price by having their streets become danger zones where people park irresponsibly and illegally.

Please reconsider this ill-thought out and unrealistically idealistic idea.

Many thanks for this.

I note that you have not responded to my specific concerns about the **removal of car parking facilities**. The residents already suffer from people attending the church and local facilities parking cars that makes Slaithwaite Road difficult for traffic to pass safely or at all, with many residents suffering damaged vehicles in the process. This happens frequently on Sundays between around 10.30am and 1.45pm while the church has services on. It will be so much worse if there is no car park at all. My concern is that residents are already paying the price for the council’s magical thinking that if you get rid of car parks, visitors will stop driving. Our experience as residents is that **this is not the case, and we are the ones suffering**.

I repeat that it is a fantasy to think that getting rid of parking facilities will stop out of borough visitors driving their cars into the borough. All that happens is residents are seriously inconvenienced and worse.

What the new plans would do is reduce legal parking even further plus bring in potentially 100 or more new residents, not to mention even more than that if your plans for 36 new residential units at the House on the Hill go ahead. It is also a fantasy to believe that none of these new residents will have/require vehicles.

Please come and view the area any Sunday from 11am-1pm and see for yourself the chaos and worse suffered by residents with the influx of terrible parking that obstructs passing traffic and damages residents' properties; and imagine how much worse this will be if you get rid of the car park and replace it with yet more residents many of whom WILL have vehicles, no matter what your idealistic beliefs are.

You might try enforcing the travel plans you imposed on the new church where you believed that people would not drive to church. However, they do and in large numbers.

Tanya Woolf

I am writing again to raise formally my objections to your plan for the House on the Hill at Slaithwaite Road.

The site is currently an open area with good nature and greenery of some age in a community facility. You are planning to turn this into multi story residential units with no consideration on the impact on the local community that uses the facilities or on residents whose lives this plan will negatively affect. You previously planned to put 36 residential units on the site but now, despite multiple objections from local residents, you

have increased the plan to 52 units. You naively once more designate it “vehicle light”. Your idealistic aspirations to reduce vehicle usage are not matched by reality. You said the same thing about the church on Lewisham High street, “the Tab”; yet every Sunday morning residents in the local streets such as Morley Road, Slaithwaite Road and Lingards avenue suffer from inconsiderately and sometimes illegally parked vehicles, accidents and shouting matches as other traffic attempts to pass the chocker block streets almost blocked by parked traffic. The situation will be much, much worse with the additional vehicles associated with 52 new residential units. And whatever you idealistically believe, residents in the new units WILL have vehicles. You cannot wish these away: you need to make realistic provision for parking. The area is already blighted by no parking for the church, the nursery in Morley Road and the new hotel on the high street. With your ludicrous plan to build on the car park at Slaithwaite Road/Clipper Way and the new residential units, the whole area will be constant chaos.

I object to this development in the strongest terms.

Tanya Woolf

Email from Wayne Duley

HOUSE ON THE HILL, 47 Slaithwaite Road.

I am responding to the proposal to develop this site from the current single storey community building into a multi-storey block providing 52 residential units.

I am a *****Redacted***** resident and strongly object to this proposal. I have a number of concerns:

Completely inappropriate type of development for the area in terms of height and design. How does this meet Key Spatial Objective no. 5 to “Reinforce and enhance the character of established residential areas, local centres and parades. At the same time, deliver new homes and area improvements through their sensitive intensification”? You only account for “....deliver new homes.....” and ignore the principal intention of the objective.

Completely inappropriate change of use from a community asset providing a much needed service, to a money-spinner for the developers. Obviously there is need to increase the housing stock, but 52 residential units (housing 181 people) is way too many for the site, whatever ‘formula’ you are using.

It should remain as a centre to be used in some way for the benefit of the community.

Loss of privacy for existing residents who will have high level windows (and maybe even balconies) looking down into their houses and gardens.

Disastrous impact on traffic movements and local residential parking. We are already swamped with incoming vehicles from the Travelodge

Hotel and the new church on Lewisham High Street. Having filled the car park they take every space in the residents' parking bays and even on the yellow lines and across people's driveways. There is a need to make all of the parking bays in Slaithwaite Road, Morley Road, Lingards Road and Clarendon Rise resident permits only, 24 hrs x 7 days, restricting non-resident parking to the car park. If they can't park, maybe they'll use public transport.

If any building does go ahead on this site then it needs to be restricted to a car-free development not just car-light (while recognising the right of disabled drivers to use the bays).

It takes days to get a GP appointment, you are lucky to find a NHS dentist, the hospital is already stretched to breaking point and you want to shoehorn in another possibly another 181 people. Where are the additional resources to support them.

It may not seem to be a big issue but the water pressure up the hill is already low. We'll be lucky if we can fill kettle with 52 new showers being used. Where is the plan to improve that.

The consultation process seems designed to exclude the existing local community. The response is always that it is conducted in line with policy x, y or z but what it doesn't do is actively engage the people that it will most affect. The information is there if you know about it and can find it. I complained about the first round of consultation in 2021 so was lucky enough to get a letter and some emails from the planners. My neighbours and the rest of the people I have spoken to never spotted the A4 notice stuck to a lamppost (before the weather took it) and were completely unaware of it. The purpose of your policies should be to reach the people to seek and take account of their views but whichever

policy you are in line with, it doesn't work! When an actual planning application is made there must be a well publicised consultation process that genuinely listens.

In the first round of consultation on this development a petition of almost sixty signatures, as well as a number of direct comments (all objecting to the proposals) were submitted. Those views are still valid, at least, the people who submitted them believe that their views should still be recognised and their comments brought forward. They therefore may not submit new comments, believing that they have already done so. The only change from the first round in 2021 is to increase the number of units from 36 to 52. Is it possible that these successive rounds of 'consultation' are designed to reduce the number of objections being reported?

Please register my objection to the development.