

Lewisham Local Plan Regulation 19 Consultation:

Statutory Consultee responses:

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FAO:
London Borough of Lewisham
Planning Service

Westminster City Hall,
64 Victoria Street, Westminster,
London SW1E 6QP

Reply to: Kimberley West
Head of City Planning Policy
kwest@westminster.gov.uk

Date: 17 April 2023

Dear Sir/Madam,

City of Westminster response to Lewisham Local Plan (Regulation 19) consultation 2023

Thank you for the opportunity to comment on Lewisham's emerging local plan.

The City of Westminster would like to make a comment related to **Policy SD12 Reducing and sustainably managing waste**. Part B of this policy makes reference to how Lewisham will work in partnership with stakeholders including the South East London Joint Waste Planning Group (SELJWPG). The supporting text to the policy, paragraph 11.77 explains that the South East London Joint Waste Technical Paper has been prepared by this group and provides details on pooled waste apportionments.

There are existing close links between the City of Westminster and other members of the SELJWPG. The London Borough of Bexley has agreed to take Westminster's London Plan waste apportionment, Westminster's residual waste is managed at SELCHP in Lewisham and our recyclables are sorted at the Integrated Waste Management Facility in Southwark. The [South East London Joint Waste Technical Paper](#) makes reference to the relationship the City of Westminster has with the SWLJWPG.

Although Westminster does not have any Strategic Industrial Locations, Locally Significant Industrial Sites or wharves for new waste facilities and there are no suitable or deliverable sites in Westminster for new waste facilities, the City of Westminster will contribute to joint work on the waste evidence base to the benefit of all members of the SELJWPG and actively co-operate to collectively work towards meeting the London Plan requirement for net self-sufficiency for waste. Westminster also imports agricultural waste from other boroughs to be composted in the city's Royal Parks, which will continue to be an important, albeit non-strategic contributor to how this waste stream is managed in London.

Westminster has made a commitment to seek to join a waste planning group as part of its most recent local plan examination and given these close connections and the proximity of Westminster



City of Westminster

to other members of the SELJWPG it makes geographical and logistical sense for Westminster to join. Westminster City Council made a formal request in writing to the Chair of the SELJWPG in 2021 to accept the City of Westminster as an additional member of the group. No response has been agreed by the SLJWPG and the City of Westminster would like to use the consultation on Lewisham's local plan as an opportunity to request again that membership be considered and granted.

I trust the above reflects our shared aspiration on close co-operation on waste management and look forward to receiving your response to this request.

Yours faithfully,

Councillor Geoff Barraclough
Cabinet Member for Planning and Economic Development

From: The Coal Authority-Planning <TheCoalAuthority-Planning@coal.gov.uk>
Sent: 13 March 2023 09:22
To: LocalPlan
Subject: FW: [External] Lewisham Local Plan - Regulation 19 Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Strategic Planning,

Thank you for your notification of 01 March 2023 regarding the Lewisham Local Plan - Regulation 19 Consultation.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

As Lewisham Council lies outside the defined coalfield, the Planning team at the Coal Authority has no specific comments to make.

Kind regards

The Coal Authority Planning Team

From: Frazer, Christopher <Christopher.Frazer@lewisham.gov.uk>
Sent: 01 March 2023 13:43
To: planning policy <planning.policy@lewisham.gov.uk>
Subject: [External] Lewisham Local Plan - Regulation 19 Consultation

You don't often get email from christopher.frazer@lewisham.gov.uk. [Learn why this is important](#)

WARNING: This email originated outside of the Coal Authority. DO NOT CLICK any links or open any file attachments unless you recognise the sender and know the content is safe. Check the spelling of any email addresses carefully for anything unusual. If you are unsure please contact the ICT Service Desk for guidance.

Dear Consultee,

Lewisham Council has launched the Regulation 19 public consultation for the Lewisham Local Plan – Proposed Submission document.

About the Local Plan

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

A new Local Plan for Lewisham

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

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

We are inviting comments on the following documents

- Lewisham Local Plan: Proposed Submission Document January 2023.
- Proposed Policies Map and Schedule of Proposed Changes to the Adopted Policies Map December 2022.
- Integrated Impact Assessment and Non-technical Summary December 2022.
- Habitats Regulations Assessment December 2022

All documents listed above are available to download on the [Council website](#)

Why are we consulting?

The Local Plan will play a vital role in how we manage new development and coordinate investment.

We have prepared the **Local Plan: Proposed Submission Document** for public consultation. It has been informed by the previous consultation and engagement exercises we have undertaken for the new plan. This includes public consultations on the Issues and Options document in 2015, the Main Issues and Preferred Approaches Document in 2021, Call for Sites exercises and engagement on evidence base documents.

During this consultation the Local Plan – Proposed Submission Document and its supporting documents will be made available for public inspection to provide any individual, group, or business the opportunity to make a representation. This consultation will require submissions to specifically focus on the following issues:

- **Is the plan legally compliant?** - Does the Plan comply with the relevant legislation and regulations in the way it has been prepared, and in its content?
- **Does the plan comply with the 'Duty to Cooperate'?** - Has the local planning authority engaged constructively, actively and on an ongoing basis with neighbouring authorities and other prescribed bodies during the preparation of the Plan?
- **Is the plan 'sound'?** - Has the Plan been 'positively prepared'? Is it robustly justified and evidence-led? Will it be effective in what it sets out to achieve? Is it consistent with regional and national planning policy?

Have your say

The consultation is open from **1st March 2023 to midnight 25th April 2023**.

If you wish to submit a representation, please complete the following [online survey](#) (*A downloadable version of the online survey has been made available in the downloadable documents section of the [online survey page](#)*)

Email - localplan@lewisham.gov.uk

or;

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

All representations must set out clearly why, and how, it is considered that the Lewisham Local Plan – Proposed Submission Document (in whole or in part) is: legally compliant or non-compliant; compliant or non-compliant with the Duty to Cooperate; and/or, sound or unsound

Please note that all submissions will be required to be made public along with the name of the person making the submission, all other personal information will be kept confidential. All submissions will then be submitted to the Secretary of State and the Planning Inspectorate for Levelling Up, Housing and Communities along with the Lewisham Local Plan- Proposed Submission Document and its supporting documents after this period of representation.

Consultation events

Virtual consultation events via Microsoft Teams will be held on:

- Thursday 16th March 2023 - 6pm to 8pm
- Thursday 23rd March 2023 - 6pm to 8pm

If you wish to attend one of the online sessions, please register by visiting the [event registration page](#)

An in person drop-in session will also be held on Saturday 25th March 2023 - 10am to 4pm at Unit 69, East Mall, Lewisham Shopping Centre

Where can I inspect the Local Plan and its supporting documents

You can inspect physical copies of the documents, the Consultation Statement main report and appendices and the Statement of Representations Procedure as well as other supporting documents at the following locations:

- London Borough of Lewisham, Laurence House, 1 Catford Road, London, SE6 4RU.
- Catford Library, Catford Centre, 23-24 Winslade Way, London, SE6 4JU.

If you wish to inspect the documents at Laurence House, please make an appointment by emailing localplan@lewisham.gov.uk or calling 02083147400

You can inspect physical copies of the documents, the Consultation Statement main report excluding the appendices and the Statement of Representations Procedure at the following locations:

- Deptford Lounge Library, 9 Giffin Street, London, SE8 4RJ.
- Grove Park Community Centre, Somertrees Avenue, London, SE12 0BX.
- Forest Hill Community Library, Dartmouth Road, London, SE23 3HZ.
- Downham Library, 7-9 Moorside Road, Bromley, BR1 5EP.
- Lewisham Library, 199-201 Lewisham High Street, London, SE13 6LG.

Information on Library opening times can be found at: <https://lewisham.gov.uk/myservices/libraries/branches> or by calling **02083147400**

You can download and inspect online versions of the documents via the [council website](#) or the [Regulation 19 consultation page](#).

Representations must be received by **25th April 2023**.

Kindest Regards

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London Borough of Lewisham
Strategic Planning Team

25 April 2023

Sent by email

London Borough of Lewisham Local Plan – Regulation 19 stage

Thank you for consulting the Environment Agency on the new Lewisham Local Plan.

The London Borough of Lewisham and Environment Agency are experienced in partnership working to deliver river restoration and an improved environment across the borough and along the river corridors such as at Cornmill Gardens, Deptford Creek, Lewisham town centre and Ladywell Fields. We are keen to continue to build on these successes and ensure new development delivers an improved environment and is designed and located to be resilient to climate change.

The new Local Plan sets clear goals on continuing to deliver an improved environment and managing flood risk and environmental protection across the borough. We can see how our previous comments and feedback have been taken on board and have helped to inform the new Local Plan. We feel the new Local Plan is sound, legally compliant and has been produced in line with the Duty to Co-operate.

We welcome the monitoring proposed to monitor green infrastructure improvements, environmental quality and pollution incidents across the borough to ensure new development is delivering environmental improvements and identify actions / measures if environmental quality is not improving.

Lewisham is a unique urban environment with extremes ranging from restored and highly valued rivers and parks to poor quality heavily urbanised and culverted rivers. We are keen to continue to work in partnership with you to ensure all new development maximises opportunities to “make space” for water and deliver environmental improvements for people and wildlife.

Since the previous Local Plan consultation the new national Environmental Improvement Plan 2023 has been published which builds on the Government’s 25 year Environment Plan. We recommend adding this plan to the evidence base / sustainability appraisal as the new plan to protect and enhance the environment and deliver the Environment Act 2021.

[Environmental Improvement Plan \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

This new plan sets 10 Environmental goals and many of these are linked to the spatial planning process such as improving and adapting the urban environment to climate change, improving water quality, improving air quality, reducing pollution and moving towards a circular economy.

- Goal 1: Thriving plants and wildlife

- Goal 2: Clean air
- Goal 3: Clean and plentiful water
- Goal 4: Managing exposure to chemicals and pesticides
- Goal 5: Maximise our resources, minimise our waste
- Goal 6: Using resources from nature sustainably
- Goal 7: Mitigating and adapting to climate change
- Goal 8: Reduced risk of harm from environmental hazards
- Goal 9: Enhancing biosecurity
- Goal 10: Enhanced beauty, heritage, and engagement with the natural environment

The delivery of the 25 Year plan and Environmental Improvement Plan will be monitored through [Outcome Indicator Reporting](#) which will be used to track delivery. Some of this reporting is ongoing such as Water Pollution incidents and some is still being developed. The data and environmental trends could inform your Local Plan delivery / reviews and the annual monitoring process.

We also recommend adding the new Plan for Water to the evidence base which has been launched recently and aims to deliver an integrated approach for clean and plentiful water.

[Plan for Water: our integrated plan for delivering clean and plentiful water - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/plan-for-water)

Key actions include:

- delivering catchment action plans backed up with new funding to improve all water bodies in England
- more funding for catchment groups and catchment-scale partnerships that coordinate action and investment where the river needs it most

We support the following Local Plan strategic objectives and are keen to work with you to deliver these through ongoing partnership working and a positive planning service and early pre application engagement.

- D - A greener borough
- E - Responding to the climate emergency
- G - Healthy and safe communities
- H - Securing timely delivery of infrastructure

We welcome and support the following new policies which aim to deliver sustainable growth and deliver environmental protection and enhancement.

Green Infrastructure

- GR1 Green infrastructure and Lewisham's Green Grid
- GR2 Open space
- GR3 Biodiversity and access to nature
- GR4 Lewisham Links
- GR5 Urban greening and trees
- GR6 Food growing
- GR7 Geodiversity

Sustainable Design and Infrastructure

- SD1 Responding to the climate emergency
- SD2 Sustainable design and retrofitting
- SD3 Minimising greenhouse gas emissions
- SD4 Energy infrastructure
- SD5 Managing heat risk
- SD6 Improving air quality
- SD7 Minimising and managing flood risk
- SD8 Sustainable drainage
- SD9 Lewisham's waterways
- SD10 Water supply and wastewater
- SD11 Ground conditions
- SD12 Reducing and sustainably managing waste
- SD13 Design to support the circular economy

Delivery and monitoring

- DM1 - Working with stakeholders to deliver the Local Plan
- DM2 - Infrastructure funding and planning obligations
- DM7 - Monitoring and review

We recommend the evidence base and is kept up to date for example the Strategic Flood Risk Assessment (SFRA) should be regularly reviewed when new climate change allowances are issued, new flood models and updated flood maps, new groundwater maps and water quality information is released. We are keen to share environmental evidence and data to inform Local Plan policies and planning decisions and data is available to download using this link [Defra Data Services Platform](#)

We look forward to continuing to work in partnership with you to ensure new development protects and enhances the environment. I hope our response is clear, if you have any questions or require more information please let me know.

Yours faithfully

James Togher

Sustainable Places Team Leader

David Syme

Head of Strategic Planning
Planning Service
Laurence House
1 Catford Road
London
SE6 4RU

Department: Planning

Our reference: LDF23/LDD09/LP02/HA01
Date: 25 April 2023

By email: David.Syme@lewisham.gov.uk
localplan@lewisham.gov.uk

Dear David,

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local
Development) (England) Regulations 2012**

Re: Lewisham Local Plan - Regulation 19 Consultation

Thank you for consulting the Mayor of London on the proposed Lewisham Local Plan - Regulation 19 Consultation. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and which are attached at Annex 1.

The Mayor provided comments on the earlier London Borough of Lewisham (LBL) Local Plan Regulation 18 'Main Issues and Preferred Approaches' consultation on 19 March 2021 (Ref: LDF23/LDD09/ LP01/JP01). This letter follows on from that earlier advice and sets out where you should make further amendments so that the draft Plan is consistent with the London Plan 2021 (LP2021). These comments should be read alongside the Mayor's previous response. The LP2021 was formally published on the 2 March 2021, and now forms part of LBL's Development Plan and contains the most up-to-date policies.

General

The draft Local Plan is centred on 22 strategic objectives which in turn are based on nine strategic themes, including housing tailored to the community with genuinely affordable homes, a greener borough, responding to the climate emergency and healthy and safe communities. Each of the objectives and overarching themes are well aligned with the Mayor's Good Growth objectives including GG1 building strong and inclusive communities, GG3 creating a healthy city and GG6 increasing efficiency and resilience.

The strategic approach is to focus growth at the borough's Growth Nodes, Regeneration Nodes and the borough's two Opportunity Areas of New Cross/Lewisham/Catford and Deptford Creek/Greenwich Riverside. This is set out clearly in Policy OL1 which also identifies more specific areas for different types of development such as residential and commercial development and this is welcomed. We note at Policy LSA3 the proposed intention for a future Opportunity Area at Bell Green and Lower Sydenham as it would benefit from a potential future extension of the Bakerloo Line beyond Lewisham.

The spatial approach is to divide the borough into five respective character areas: South, Central, Western, Eastern and Northern. Table 13.1 in relation to the proposed site allocations then breaks down indicative growth capacities covering a 20-year period for each of the character areas in relation to new homes, employment floorspace and town centre uses. It sets out the intention to deliver between 24,413 and 26,887 new homes and 237,228sqm of employment floorspace over the course of the Plan. This approach is clear, direct and very comprehensive. This clarity is welcome, but the employment figures would further benefit by being divided into their indicative component growth figures for Class E and Class B uses. Given the breadth of Class E uses, consideration could be given to where these might be appropriately located e.g. town centres, designated industrial land.

While this potential growth is welcomed, it is less clear what the borough's growth needs are over the life of the Plan. Only then can we understand how the strategic approach is able to contribute towards meeting those needs. The Plan period starts in 2020 and runs until 2040.

As currently written, it is the Mayor's opinion that the draft Plan is not in general conformity with the LP2021 for two reasons related to the proposed management of the borough's industrial land. Firstly, the proposed downgrading of three parcels of industrial land from Strategic Industrial Locations (SILs) to Locally Significant Industrial Sites (LSIS) has not been supported by evidence robust enough to demonstrate that the proposed designation of new SIL at the Bermondsey Dive Under site is suitable replacement to realistically support functional SIL. Secondly, LBL have not sufficiently established what the borough's industrial need is over the life of the Plan. This should be based on up-to-date information and should form the basis of the borough's intended approach to the management of its industrial land.

These issues are discussed in greater detail below. GLA officers have previously worked with LBL officers to resolve matters in relation to tall buildings and are happy to offer their continued support and guidance in resolving these outstanding issues ahead of LBL submitting the draft Plan for examination.

Housing

Lewisham's housing target is set out in Table 4.1 of the LP2021 and this is reflected in Policy HO1 to deliver and exceed the delivery of 16,670 new homes between 2019 and 2029 and this is welcomed. We note LBL's intention to roll forward the borough housing target beyond 2029 (1,667 new homes a year) but LBL should take into consideration paragraph 4.1.11 of the LP2021 which states that if a target is required beyond 2029 boroughs should draw on the 2017 SHLAA findings, any local evidence of identified capacity, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the borough's small sites housing target.

Boroughs should take into consideration under-delivery of housing for the period 2019 until the start of the Local Plan period, and LBL have recognised this by adding an additional requirement to deliver 461 new homes for the first five years of the Plan. This too is welcomed.

Policy HO1 should reflect the borough's small sites target which is set out in Table 4.2 of the LP2021 for the delivery of 379 new homes a year from sites below 0.25ha in size. Small sites can be a valuable source of future housing supply in London and LBL is encouraged to promote

this form of development by following the guidance set out in Policy H2 of the LP2021. Policy HO2 of the draft Plan seeks to optimise the delivery of housing from small sites and the small sites target is reflected in paragraph 7.14 of the draft Plan. While this is welcomed it is considered that it should, nevertheless, be included within a policy, as it is a strategic target. LBL's intention to exceed its small sites target as set out in paragraph 7.15 is supported by the Mayor and is consistent with paragraph 4.2.5 of the LP2021 which makes it clear that the small sites target should be treated as a minimum.

The draft Plan is generally positive about housing from small sites and it is noted that seven have been identified as potential site allocations. The Mayor encourages boroughs to take a proactive approach towards housing delivery from small sites. Policy H2B of the LP2021 makes it clear how boroughs should go about this by preparing site-specific briefs, masterplans and housing design codes for small sites and by identifying and allocating appropriate small sites for residential development among several other suggestions. The Mayor has published the draft Small Sites Design Code London Plan Guidance¹ document which provides further detail and LBL are advised to follow it.

Affordable housing

In Policy H4 of the LP2021 the Mayor has set a strategic target that 50% of all new homes in London should be affordable and this is reflected in Policy HO1 part E and Policy HO3 which is noted and welcomed.

Policy HO3 makes clear the intention to follow the Mayor's threshold approach to affordable housing. Part A of the policy sets out clearly that residential development proposals achieving a minimum 35% affordable housing will follow the Fast Track Route (FTR). Part F of the Policy reflects other threshold levels set out in Policy H5 of the LP2021 which are for 50% affordable housing on publicly owned land and on designated industrial land where development would result in the loss of industrial capacity. However, to be completely consistent with Policy H5 of the LP2021, it should set out that where residential development on non-designated industrial sites would result in the loss of industrial capacity the threshold should be set at 50% too. This criterion should also be included in Policy HO3 for clarity and consistency with the LP2021.

Policy HO3, or supporting text, should also make it clear that the 50% threshold for affordable housing only applies to publicly owned land where there is no portfolio agreement with the Mayor. This is set out in Policy H5 of the LP2021 and is clarified at paragraph 4.5.6 which states that where there is such an agreement to deliver at least 50% affordable housing across the portfolio of sites, then the 35% threshold should apply to individual sites. This clarification would be welcomed.

The requirement in Part D of Policy HO3 that applications should make reasonable efforts to secure grant funding to increase affordable housing is noted and is consistent with LP2021 Policy H5C4.

As drafted, Policy HO3 part E (a) uses the term 'subject to viability' in relation to affordable housing. LBL should avoid using this term and instead substitute it with 'subject to the threshold approach'. Seeking the 'maximum amount of affordable housing subject to viability' is no longer the supported method of seeking affordable housing from residential development. Paragraph 4.4.2 of the LP2021 explains that the threshold approach provides an opportunity to move away from viability debates, creates greater certainty in terms of affordable housing requirements, embeds affordable housing requirements into land values and offers a clear

¹ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/small-site-design-codes-lpg>

incentive for developers to achieve the threshold levels. LBL should note this and amend part E of the policy accordingly.

LBL are seeking an affordable housing tenure split of 70% social rent or London Affordable Rent and 30% intermediate housing. This is consistent with Policy H6 of the LP2021.

Paragraph 7.45 of the draft Plan makes it clear that demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. This is welcome and aligned with Policy H8 of the LP2021. LBL should also reflect that all development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route (VTR) and should seek an uplift in affordable housing in addition to the replacement of affordable housing floorspace.

Older Persons Housing

Paragraph 7.48 of the draft Plan is clear that there is a need for 121 specialist older persons homes each year in the borough. This is a locally evidenced figure of need which is noted and welcomed. The figure is comparable to the annual borough benchmark for LBL set out in Table 4.3 of the LP2021 for the delivery of 100 specialist older persons homes. The strategic need for older persons housing should be reflected within Policy HO5 to promote this type of development and elevate its importance. Boroughs are encouraged to work positively with providers to identify sites which may be suitable as set out in Policy H13 of the LP2021.

Gypsy and Traveller accommodation

Policy HO10 identifies a need for 6 additional pitches up to 2031. Part A of the Policy indicates that a site allocation has been put forward which addresses this need. Paragraph 7.84 makes it clear that Land at Pool Court can meet the borough's pitch requirements. While this is welcomed the LP2021 makes it clear that boroughs should set out their ten-year pitch requirements and this should illustrate when need for the additional pitches comes into play. As drafted, it is not clear if the need for additional pitches is immediate and that information would be useful. On reading the proposed site allocation for Land at Pool Court, it becomes clear that new pitches could be delivered in the first five years of the Plan. It would be convenient for readers if all relevant information was included in Policy HO10 or supporting text.

Tall buildings

Policy QD4 sets out the borough's proposed approach towards tall buildings. In the draft Plan tall buildings are defined as those which are over 10 storeys or 32.8m high measured from the ground level to the very top of the building. As such the proposed definition meets the requirements of LP2021 Policy D9 and is welcomed. Policy QD4 is clear that tall buildings should only be developed in areas identified as suitable for tall buildings on the Policies Map. These locations are identified as 'Tall Building Suitability Zones' and the policy makes it clear that proposals for tall buildings outside of those areas will be resisted. It is noted and welcomed that this requirement is consistent with Policy D9B of the LP2021. Part C of Policy QD4 then lists what are considered to be appropriate heights in specific tall building locations, thus meeting the requirements of LP2021 Policy D9B2. Tall building locations are illustrated in Figure 5.1.

There are six strategic views which run through the borough. These are: Alexandra Palace viewing terrace to St Paul's Cathedral, Primrose Hill summit to the Palace of Westminster, Kenwood viewing gazebo to St Paul's Cathedral, Parliament Hill summit to St Paul's Cathedral, Primrose Hill summit to St Paul's Cathedral, and Primrose Hill summit to St Paul's Cathedral. These are clearly illustrated in Figure 5.2 and Part D of Policy QD4 of the draft Plan makes

reference to them, meaning that planning applications will be required to take them into account. This is consistent with Policy HC3 of the LP2021.

Paragraph 5.36 of the draft Plan notes the sensitivity of the Maritime Greenwich World Heritage Site (WHS) in relation to tall building proposals in Lewisham. While this is welcomed, illustrating its location on Figures 5.1 and 5.2 would also be useful and should be considered. To be consistent with Policy HC2 of the LP2021, LBL should include a reference to the WHS in Policy QD4 itself and where tall building development proposals have the potential to affect the WHS itself or its setting there should be a requirement for Heritage Impact Assessments. Paragraph 5.36 refers to the Maritime Greenwich WHS Buffer Zone as being an inappropriate location for tall buildings, but the zone could also benefit from being illustrated in Figures 5.1 and 5.2 for convenience. It is noted that the buffer zone is currently illustrated in Figure 6.1 and LBL may wish to consider including a reference to that map in paragraph 5.36.

Heritage

Policy HE2 refers to the Maritime Greenwich WHS Buffer Zone but only the part of the buffer zone located within Lewisham is illustrated in Figure 6.1. We suggest that it may be beneficial to illustrate the entire WHS and its buffer zone in relation to Lewisham as development within the borough can still have an impact on the WHS even if located beyond the buffer zone.

Industrial land

It is Lewisham's intention to downgrade the designation of Strategic Industrial Locations (SIL) at three sites: Trundley's Road/Apollo Business Centre, Mercury Way Waste Sites and Evelyn Court SIL to Locally Significant Industrial Locations (LSISs). This would allow for the co-location of industrial and non-industrial uses. To be consistent with Policies E4 and E7B of the London Plan, Lewisham must re-provide this SIL capacity, in addition to any demand identified by an up-date evidence base as part of the borough's strategic approach to meeting industrial capacity needs over the Plan period.

LBL are proposing a new SIL at the Bermondsey Dive Under (BDU) site in order to re-provide the SIL capacity for the losses of SIL at Trundleys Road/Apollo Business Centre, Mercury Way Waste Site and Evelyn Court. However, LBL have not established precisely how much SIL capacity can realistically be provided at the BDU site. Without that information we cannot be clear if the Bermondsey Dive Under Site is capable of matching the lost capacity.

It should be noted that for the BDU site to be functional SIL it must be capable of supporting the full range of industrial uses, including those for B2 and B8 type activities. If the site is only capable of supporting light industrial uses then it cannot be fully considered to be a suitable replacement for the loss of SIL at Trundleys Road/Apollo Business Centre, Mercury Way Waste Site and Evelyn Court.

The BDU site is complex and access to the site is made difficult for large vehicles as a result of a number of low railway bridges. It is very likely that investment would be required to address access issues and these have not been investigated or evidenced. Without more detailed information about these issues or about the need requirements that must be met it is uncertain whether the site can realistically accommodate (sufficient) suitable and functional SIL replacement capacity.

LBL carried out an Employment Land Study in 2019 which forecasts a need for 21,800sqm of net additional office floorspace up to 2038. However, the study does not include an individual figure of need for industrial capacity over the life of the Plan. In addition, the borough's requirement for industrial capacity should be broken down into respective requirements for B2, B8 and light industrial uses. Instead, the draft Plan includes a generic figure for 21,800sqm of employment floorspace need up to 2038 which is ambiguous and lacks necessary clarity and

detail. The draft local plan therefore does not meet the requirement of LP2021 Policy E4A, as there is no up-to-date demand-side evidence to assess.

In the Mayor's response to LBL's Local Plan Regulation 18 consultation he stated that the Local Plan should identify, coordinate, and transparently set out the overall land and floorspace requirements as well as provision of an appropriate mix of industrial uses that meets the need for all industrial functions, particularly within Use Class B8. More focus on B8 within SIL / LSIS may also be appropriate, given that the new Use Class E could potentially erode former B1(c) uses within SIL / LSIS designations. This matter remains unresolved in the current version of the draft Plan.

Paragraph 8.10 makes it clear that LBL will ensure that there will be no net loss of industrial capacity in the borough and that net gains will be delivered where possible. This is generally positive but does not accord with the proposed downgrading of designated SIL or the concerns set out regarding the replacement capacity. In the absence of established up-to-date need for industrial capacity over the life of the Plan, and broken down into component parts, it is impossible to determine if the proposed approach will meet the borough's industrial needs over the Plan period.

The LBL's Employment Land Study 2019 bases industrial need on the London Industrial Land Demand Study (2017) (based upon 2015 survey data) and relies on the surplus of 12.4ha of industrial land up to 2041 set out in that study. Since that time the Mayor has published more up-to-date industrial land supply data² which demonstrates that between 2015 and 2020 LBL has already released 16.3ha of industrial land to other non-industrial uses. This is above the surplus previously identified and means that it is possible that LBL now have a positive demand for industrial capacity over the Plan period. Therefore, LBL's employment land evidence may not support the approach set out in the Plan.

Overall, the spatial strategy for industrial capacity is not sufficiently supported by necessary evidence. In providing suitable evidence, the following should also be taken into account:

- The Plan should make provision for emerging sectors and increased demand for logistics space. The new and emerging sectors, include film and tv production, data centres and dark kitchens, and should be considered as part of LBL's industrial evidence to establish LBL's industrial capacity requirements over the Plan period and ensure that the capacity is appropriate. Their potential impacts should also be taken into consideration.
- LBL is located within the Central Services Area (CSA) and as such the council should follow the guidance in paragraph 6.4.7 of the London Plan, recognising the need to provide essential services to the CAZ and Northern Isle of Dogs. In particular, priority should be given to sustainable 'last mile' distribution/logistics, 'just-in-time' servicing, waste management and recycling and land to support transport functions. In contrast, the draft Plan is resistant to warehousing and distribution proposals. The draft Plan makes it clear that development proposals for warehousing and distribution in LSIS are to follow a sequential approach, first ruling out SIL sites and then potential sites in neighbouring boroughs and the London southeast sub-region before they will be considered in the borough. LBL's evidence suggests that demand is greatest for light industrial and office related uses but it does not clearly set out what the need is for B8, B2 and Eg(iii) industrial capacity over the plan period. LBL's industrial evidence was completed prior to the pandemic and the need for B8 uses may have increased as a result since that time.

² <https://data.london.gov.uk/dataset/london-industrial-land-supply-study-2020>

The draft Plan proposes local designations called 'Mixed-use Employment Locations' (MELs). Eight are proposed in total and they are described as larger redundant and/or under used industrial sites. These areas are essentially 'non-designated industrial sites' and as such LP2021 Policy E7C is relevant. This makes it clear that mixed-use or residential development proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted local Development Plan Document for industrial, storage or distribution floorspace and is provided as part of mixed-use intensification. In light of this the approach for MELs should be amended accordingly.

We note that LBL expect development proposals in MELs and non-designated industrial sites to result in an uplift in job numbers. However, it should be recognised that some essential industrial activities may have comparatively low job densities and the approach could inadvertently lead to further erosion of industrial capacity.

Policy EC6 part C and paragraph 8.34 make it a requirement that all development proposals for storage and warehousing must deliver a reasonable proportion of flexible workspace or units to meet the needs of micro, small and medium sized businesses, the amount of which will be considered on a case-by-case basis. While the intention to provide for suitable space for small and medium sized businesses is recognised and welcomed the proposed approach is not consistent with that set out in Policy E2 of the LP2021. LBL is advised to follow the guidance set out in Part D of that policy which is clear that development proposals for new B Use Class greater than 2,500sqm, or a locally determined lower threshold based on up to date evidence, should consider the scope to provide a proportion of flexible workspace or smaller units that are suitable for micro, small and medium-sized enterprises. In light of this, paragraph 8.34 should be amended accordingly to reflect relevant evidence to support the proposed approach.

LBL's proposed approach to the management of its industrial land diverges significantly from the approach in the LP2021. For that reason, the Mayor is of the opinion that as currently written the draft Plan is not in general conformity with the LP2021. To be clear and in order to address the objection LBL must update their industrial evidence accordingly to establish in greater detail what the borough's industrial capacity needs are over the Plan period and sufficient evidence should also be provided to clearly demonstrate that the BDU site is capable of delivering suitable and functional SIL industrial capacity to support the proposed downgrading of SIL at the other sites.

Offices and Town Centres

Policy EC2 establishes a need for 21,800sqm of additional employment floorspace up to 2038. LBL's Employment Land Study (2019) clarifies that this figure of need is purely for office space and that should be made clearer in the draft Plan.

Lewisham and Catford are designated as Major Town Centres and Lewisham is identified as having future potential to be upgraded to Metropolitan Town Centre status (London Plan Table A1.1). The Local Plan seeks to support the envisaged transformation in a sustainable way highlighting improvements to accessibility and public realm as well as Site Allocations supporting significant levels of growth. Beyond quantitative aspects, it will be important for LBL to promote a broad mix of diverse uses. LBL should put in place a town centre strategy to demonstrate how the borough will support a transformation away from car-based travel while exploring the potential for residential mixed-use opportunities within any existing retail parks within the borough.

It is noted that Policy EC6 promotes office development within the borough's LSIS and Policy EC7 promotes office development within the borough's MELs. This approach is not consistent with the LP2021. Policy SD7 of the LP2021 promotes a town centres first approach and this is

reflected in Table A1.1 of the LP2021 which establishes that Lewisham Town Centre, has demand for existing office functions, generally within smaller units. The correct approach is set out in Policy E1D of the LP2021 which makes it clear that new office development should be focussed in the borough's town centres and other existing office clusters where they are supported by improvements to walking, cycling and public transport as set out in Part D of the Policy. If Use Class E is going to be provided on industrial land, this needs to be done in a way that does not prejudice meeting the needs of B2 and B8 uses, and ensuring there is still sufficient industrial land available for those E uses that require an industrial location. LBL should amend Part A of Policy EC6 and EC7 accordingly.

Policy EC12 Part B sets out an intention to follow a 'town centres' first approach which is consistent with Policy SD7 of the LP2021. However, LBL should recognise and understand that the LP2021 identifies offices as a town centre use which is set out clearly in Policy SD7A of the LP2021 and this should be reflected in the draft Plan accordingly.

Night-time economy

The LP2021 identifies the town centres of Catford, New Cross/New Cross Gate, Lewisham and Blackheath as all having a night-time economy NT3. This means that these areas have a night-time economy with more than local significance, and this is reflected clearly in Figure 8.12 of the draft Plan which is very welcome. The proposed approach to direct night-time uses to these areas is consistent with Policy HC6 of the London Plan but LBL could go further and explore the benefits of diversifying the night-time mix of uses as set out in paragraph 7.6.9 of the LP2021.

Green infrastructure

Paragraph 10.3 of the draft Plan reflects the Mayor's target to make London at least 50% green by 2050 and this is welcomed.

It is noted that Policy GR2 of the draft Plan intends to give the same status to locally designated Local Green Spaces as to Metropolitan Open Space (MOL). If LBL hasn't already done so, it may be appropriate to consider the option of designating some of these spaces as MOL where they meet the requirements of the 4 tests set out in Policy G3B of the LP2021. For example, if Local Green Space contributes towards the physical structure of London by being clearly distinguishable from the built-up area it could be considered for its suitability as MOL.

Climate change

We note in Policy SD1 of the draft Plan the ambition of the borough to be net zero carbon which is welcomed. Paragraph 11.3 reflects the Mayor's ambition set out in the LP2021 for London to be net zero carbon by 2050. LBL should note that the Mayor has since updated this target and now intends that London is net zero carbon by 2030.

Air Quality

The requirement in the draft Plan that development proposals should be air quality neutral as set out in Policy SD6 is consistent with Policy SI 1 in the LP2021 and this is noted and welcomed. It is recognised that Part C of Policy SD6 also sets out a requirement for air quality assessments for development proposals in Air Quality Focus Areas (AQFAs). AQFAs are areas that already exceed the EU annual mean limit for nitrogen dioxide and have high levels of human exposure and these have been illustrated very clearly in Figure 11.2 which is very useful. LBL should be requiring that development proposals in AQFAs incorporate design measures to limit exposure to currently poor air quality. This requirement is different from a requirement for Air Quality assessments and should be recognised as such.

Safeguarded Wharves

Policy SD9 Part E of the draft Plan makes it clear that Convoys Wharf is one of London's safeguarded wharves. The intention to continue to safeguard it is consistent with the approach in the LP2021 and the promotion of water transport there is also aligned with Policy SI 15E of the LP2021 which is clear that safeguarded wharves should only be used for waterborne freight-handling use, including consolidation centres.

Metropolitan Open Land (MOL)

We note that LBL are proposing the de-designation of two parcels of MOL. One is located in Catford and is necessary for the realignment of the South Circular. The other relates to Lewisham Town Centre and was part of a planning consent granted in 2006.

Policy G3C of the LP2021 sets out that any alterations of MOL should be undertaken through the Local Plan process and should only be changed in exceptional circumstances. Given the very specific circumstances related to each of the two situations the Mayor does not object to the proposed boundary changes.

Site allocations

The proposed site allocations include figures for proposed employment and main town centre uses which provide for a basic level of detail. The proposed site allocations combine office and industrial uses into a single 'employment space' figures. Proposals for office and industrial development are treated very differently in the LP2021 and the site allocations should include independent figures for both so that the requirement for each is clearer in relevant allocations and can be treated correctly. Setting out proposals for 'employment use' for some allocations risks the loss of valuable industrial capacity to speculative proposals for office development. Office development should be directed to the borough's town centres while industrial capacity should be focused in the borough's designated and non-designated industrial areas. The site allocations should therefore include separate categories for indicative capacities for office and for industrial proposals. It would also be useful to understand what uses LBL includes under that heading - where proposals for industrial capacities are set out in individual allocations it would be very useful if industrial requirements were broken down even further into their component B2, B8 and light industrial uses. The proposed allocations also include proposals for main town centre uses. Town centre uses should be consistent with those set out in Policy SD7A of the LP2021 but as written it is not clear whether the heading includes provision for office development. This clarity would be welcomed.

Site	Commentary
100-114 Loampit Vale	The site is home to what appears to be non-designated industrial uses. In light of this the allocation should take into account Policy E7C of the LP2021. This sets out that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. It is noted that the site was granted planning permission in 2018 for residential mixed-use development. If this site is needed as part of a wider strategy to meet Lewisham's industrial needs, site allocation should be considered in order to provide industrial capacity should the extant planning permission lapse.
Land at Nightingale Grove and Maythorne Cottages	The site is home to what appears to be non-designated industrial uses. In light of this the allocation should take into account Policy E7C of the LP2021. This sets out that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. It is noted that the site was granted planning permission in 2020 for residential mixed-use development. If

	<p>you find you need this site as part of a wider strategy to meet your industrial needs, you should consider its allocation in order to provide industrial capacity should the extant planning permission lapse.</p>
Evelyn Court at Surrey Canal Road Strategic Industrial Location	<p>LBL propose to downgrade this area of currently designated SIL to LSIS. It is suggested that SIL reprovion will be made at Bermondsey Dive Under site. As discussed elsewhere there is currently insufficient evidence to demonstrate that the BDU site is capable of delivering functional and suitable SIL replacement capacity. This is considered essential to facilitate the proposed change of designation from SIL to LSIS in this proposed allocation to bring about co-location of industrial and non-industrial uses on this site.</p>
Surrey Canal Road and Trundleys Road Locally Significant Industrial Site	<p>LBL propose to downgrade this area of currently designated SIL to LSIS. It is suggested that SIL reprovion will be made at Bermondsey Dive Under site. As discussed elsewhere there is currently insufficient evidence to demonstrate that the BDU site is capable of delivering functional and suitable SIL replacement capacity. This is considered essential to facilitate the proposed change of designation from SIL to LSIS in this proposed allocation to bring about co-location of industrial and non-industrial uses on this site.</p>
Apollo Business Centre Locally Significant Industrial Site	<p>LBL propose to downgrade this area of currently designated SIL to LSIS. It is suggested that SIL reprovion will be made at Bermondsey Dive Under site. As discussed elsewhere there is currently insufficient evidence to demonstrate that the BDU site is capable of delivering functional and suitable SIL replacement capacity. This is considered essential to facilitate the proposed change of designation from SIL to LSIS in this proposed allocation to bring about co-location of industrial and non-industrial uses on this site.</p> <p>There is an existing waste use on this site which is noted at paragraph 15.51. To be consistent with Policy SI 9 of the LP2021, development proposals that would result in the loss of this site would need to provide compensatory waste capacity elsewhere that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost. This should be made clear in the allocation. However, it is noted that Paragraph 15.51 makes reference to LP2021 Policy SI 9 which is welcome.</p>
Bermondsey Dive Under	<p>The proposed allocation is to designate the site as part LSIS and part SIL and to provide for the SIL capacity downgraded at Trundleys Road, Apollo Business Centre and Evelyn Court. The allocation proposes 5,264sqm of employment floorspace to be split between SIL and LSIS. The allocation does not quantify how much SIL capacity alone can realistically be provided at the site and therefore it is not clearly established that the allocation is able to completely offset the proposed downgrading of SIL at the other sites. The site is constrained by existing rail infrastructure making access for larger vehicles difficult and the site allocation should demonstrate that the site is capable of providing operational and functional SIL capacity. The proposed allocation should demonstrate that plans to accommodate SIL type industrial activities on the site are realistic and viable. As currently drafted neither of these issues have been addressed.</p>
Lower Creekside Locally Significant Industrial Site	<p>The allocation proposes a masterplan approach for this site to ensure the effective co-location of industrial and non-industrial uses. The allocation proposes a no net loss approach towards the protection of industrial capacity which is welcomed. As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.</p> <p>To be consistent with LP2021 Policy E7D it should be made clear in the allocation that reprovided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied. We note planning permission has been granted for residential mixed-use development on part of the site.</p>
Sun Wharf Mixed-Use Employment Location (including Network Rail Arches)	<p>The site is currently home to industrial uses such as warehousing and storage facilities. It is noted that planning permission has recently been granted for the reconfiguration of the Cockpit Arts Centre, a former office block which is now home to artist spaces. As the site is home to non-designated industrial uses LBL should follow the guidance in Policy E7C of the LP2021. This makes it clear that mixed-use or residential development proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes or it has been allocated in an adopted DPD, or industrial, storage or distribution floorspace is provided as part of mixed-use intensification. It is noted that the site is currently allocated as part of LBL's Site Allocations Local Plan (2013). As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.</p>
Southbrook Mews	<p>The site may currently be home to non-designated industrial uses and the proposal is for</p>

	<p>the introduction of residential uses. In light of this the proposed site allocation should follow the guidance set out in Policy E7C of the LP2021. This makes it clear that mixed-use or residential development proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes or industrial, storage or distribution floorspace is provided as part of mixed-use intensification. The proposal does provide for employment floorspace which is ambiguous. As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.</p>
Stanton Square Locally Significant Industrial Site (LSIS)	<p>The allocation proposes a masterplan approach for this site to ensure the effective co-location of industrial and non-industrial uses. The allocation proposes a no net loss approach towards the protection of industrial capacity which is welcomed. As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.</p> <p>To be consistent with LP2021 Policy E7D it should be made clear in the allocation that reprovided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied.</p>
Worsley Bridge Road Locally Significant Industrial Site	<p>The allocation proposes a masterplan approach for this site to ensure the effective co-location of industrial and non-industrial uses. The allocation proposes a no net loss approach towards the protection of industrial capacity which is welcomed. As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.</p> <p>To be consistent with LP2021 Policy E7D it should be made clear in the allocation that reprovided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied.</p>
Land at Pool Court	<p>It is noted that the site is proposed to address identified need for Gypsy and Traveller Accommodation. The site may currently be home to non-designated industrial uses in which case LBL should note that the proposed allocation should follow the guidance set out in Policy E7C of the LP2021. This makes it clear that mixed-use or residential development proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes or industrial, storage or distribution floorspace is provided as part of mixed-use intensification.</p>
111-115 Endwell Road	<p>The site is currently home to industrial uses and planning permission has recently been granted for an increase in light industrial floorspace. It is noted that the allocation is for residential and employment use. The site is home to non-designated industrial uses. In light of this the allocation should take into account Policy E7C of the LP2021. This sets out that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. If you find you need this site as part of a wider strategy to meet your industrial needs, you should consider its allocation in order to provide industrial capacity should the extant planning permission lapse.</p>
6 Mantle Road	<p>The proposed allocation is currently home to industrial uses and part of the site, at least, is considered to be a non-designated industrial site. It is noted that the allocation is for residential and employment use. The site is home to non-designated industrial uses. In light of this the allocation should take into account Policy E7C of the LP2021. This sets out that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. The site is currently allocated as part of LBL's Site Allocations Local Plan (2013). As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.</p>
Land at Forest Hill Station East (Waldram Place and Perry Vale)	<p>The site may currently be home to non-designated industrial uses and the proposal is for the introduction of residential and town centre uses. In light of this, LBL should note that if there are current non-designated industrial uses the proposed allocation should follow the guidance set out in Policy E7C of the LP2021. This sets out that mixed-use or</p>

	<p>residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. The site is currently allocated as part of LBL's Site Allocations Local Plan (2013). As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.</p>
<p>Land at Forest Hill Station West (Devonshire and Dartmouth Roads)</p>	<p>The site may currently be home to non-designated industrial uses and the proposal is for the introduction of residential and town centre uses. In light of this, LBL should note that if there are current non-designated industrial uses the proposed allocation should follow the guidance set out in Policy E7C of the LP2021. This sets out that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. The site is currently allocated as part of LBL's Site Allocations Local Plan (2013). As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.</p>
<p>Perry Vale Locally Significant Industrial Site</p>	<p>The allocation proposes a masterplan approach for this site to ensure the effective co-location of industrial and non-industrial uses. The allocation proposes a no net loss approach towards the protection of industrial capacity which is welcomed. To be consistent with LP2021 Policy E7D it should be made clear in the allocation that reprovided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied. The site is currently allocated as part of LBL's Site Allocations Local Plan (2013). As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.</p>
<p>Clyde Vale Locally Significant Industrial Site</p>	<p>The allocation proposes a masterplan approach for this site to ensure the effective co-location of industrial and non-industrial uses. The allocation proposes a no net loss approach towards the protection of industrial capacity which is welcomed. To be consistent with LP2021 Policy E7D it should be made clear in the allocation that reprovided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied. The site is currently allocated as part of LBL's Site Allocations Local Plan (2013). As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.</p>
<p>Willow Way Locally Significant Industrial Site</p>	<p>The allocation proposes a masterplan approach for this site to ensure the effective co-location of industrial and non-industrial uses. The allocation proposes a no net loss approach towards the protection of industrial capacity which is welcomed. To be consistent with LP2021 Policy E7D it should be made clear in the allocation that reprovided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied. The site is currently allocated as part of LBL's Site Allocations Local Plan (2013). As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.</p>

Next steps

I hope these comments positively inform the preparation of the LBL Local Plan. The GLA will continue to offer support to work with you to address the issues identified in this letter and to ensure it aligns more closely with the LP2021 as well as delivering the Council's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Hassan Ahmed on [REDACTED] or at [REDACTED].

Yours sincerely,



Lucinda Turner

Assistant Director of Planning

Cc: Len Duvall OBE, London Assembly Constituency Member
Sakina Sheikh, Chair of London Assembly Planning Committee
National Planning Casework Unit, DLUHC



Annex 1 – Transport for London Response

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London Borough of Lewisham
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25 April 2023

Consultation on the Lewisham local plan: proposed submission document (regulation 19)

Thank you for giving Transport for London (TfL) the opportunity to comment on the Lewisham regulation 19 draft local plan.

Please note that these comments represent the views of TfL officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority. A separate response has been prepared by TTL Properties Limited to reflect TfL's interests as a landowner and potential developer.

The London Plan was published in March 2021. Local plan policies and site allocations should be developed in general conformity with the London Plan policies and TfL's aims as set out in the Mayor's Transport Strategy. In particular, it is important that local plans support the Healthy Streets Approach (reducing car dependency and increasing active, efficient and sustainable travel), Vision Zero (the elimination of all deaths and serious injuries on London's transport system) and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

We are pleased to see that the Lewisham regulation 19 draft local plan builds on the previous version and takes on board much of our previous regulation 18 response to support these aims. We welcome the inclusion of Good Growth principles, as well as responding strongly to climate change and linking the proposed Bakerloo line extension (BLE) to supporting these goals. We appreciate the support for the BLE that is set out in the local plan and have provided comments

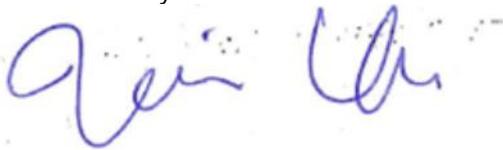
to ensure consistency in the messaging regarding this project. There remain a couple areas that we would like to highlight to further strengthen the draft local plan and ensure internal consistency with the overarching Strategic Objectives and key policies.

We strongly support the Council's proposed approach to car parking which supports car-free development in locations which are well-connected and car-lite development in locations which are less well-connected. We also welcome that the local plan identifies growth in well-connected locations which will further support the wider ambition to reduce car use and enable modal shift in the borough. Some additional changes could be made to provide further clarity to the intended application of policy TR4. A number of policies refer to parking requirements. These references should be removed to be in line with the London Plan and to be internally consistent with policy TR4.

We welcome that the Council has incorporated many of our previous comments on the BLE. We previously strongly advised that the Council clearly articulate that the scenario with no BLE is not 'preferred' but is being considered to allow for the uncertainty of the BLE's delivery within the plan period. It is very much welcomed that this scenario has been removed and that a much stronger rhetoric around the benefits of the BLE has been included. We would suggest some additional changes to further refine how the Plan relates to the BLE.

We have set out a number of comments and proposed changes on the following pages which we hope are helpful. We look forward to continuing our work together in drafting the final document.

Yours faithfully



Josephine Vos

London Plan and Planning Obligations Manager

Email: josephinevos@tfl.gov.uk

Appendix A: Detailed comments and suggestions for amendments

Policy	Page	Comment/Amendment
General comments		‘Public transport accessibility’ should be replaced with ‘public transport access’ or ‘access to public transport’, throughout the local plan, for consistency with the London Plan. ‘PTAL’ as defined in the London Plan means ‘public transport access level’.
Strategic Objectives	44–5	<p>We support the Strategic Objectives set out, and particularly welcome the amendment to Strategic Objective H21 to explicitly include the reduction of car use as part of the objective. We would additionally suggest that explicit reference is made to active travel alongside public transport: ‘Work in partnership with central government, the Greater London Authority, Transport for London, Network Rail and other stakeholders to reduce car use, increase active travel, and increase public transport capacity and accessibility across the Borough, as well as to unlock the development potential of specific localities and strategic sites, including through the delivery of the Bakerloo Line Extension.’</p> <p>As set out in our regulation 18 consultation response, the Council should consider explicitly providing policy support for Low Traffic Neighbourhoods in Strategic Objective G17: ‘Create an environment that encourages and enables people to pursue active and healthy lifestyles irrespective of their age, ability or income, including by applying the Healthy Streets Approach, creating Low Traffic Neighbourhoods, making provision for accessible leisure and recreation opportunities and protecting the amenity of residents and visitors, particularly from pollution.’</p>
OL1: Delivering an Open Lewisham	48–57	<p>The amendments throughout Policy OL1 result in a more positively worded, clear and concise policy. In particular, we welcome the direct reference to the Healthy Streets Approach and proposals to improve connectivity between neighbourhoods by sustainable modes.</p> <p>While we welcome the explicit and repeated commitment to directing development to well-connected locations as well as Growth Nodes, Growth Corridors and Opportunity Areas, areas around stations are conspicuously absent. Areas within walking distance of rail stations have the potential to support a higher development capacity, even with a nominally low PTAL due to the relative connectivity provided by quick journey times to key interchanges, especially Lewisham and London Bridge stations. It is recommended OL1Aa. is amended: ‘Directing new development to Growth Nodes, Regeneration Nodes and well-connected sites, including in Lewisham’s Opportunity Areas of New Cross/Lewisham/Catford and Deptford Creek/ Greenwich Riverside and around</p>

Policy	Page	Comment/Amendment
		<p>stations, and carefully managing growth in these locations in response to local character’.</p> <p>The BLE is mentioned throughout this section positively and the Council makes a commitment to work towards the delivery of the BLE in paragraph 3.21. We appreciate that the local plan references the challenges of funding the BLE and therefore has stated that the spatial strategy is not reliant on the delivery of the BLE. We recommend that the plan clearly articulates that whilst the spatial strategy is not reliant on the BLE, the BLE remains a key spatial objective.</p>
QD3: Public realm and connecting places	81–5	<p>Part B: We strongly support the additions to Part B of the policy which refer to the need to apply the Healthy Streets Approach to enable walking, cycling and use of public transport, as well as reducing vehicular speed and dominance.</p> <p>5.23: Reference should additionally be made to TfL’s Streetscape guidance³: ‘Development proposals are also encouraged to refer to the Government’s Manual for Streets and Transport for London’s Streetscape guidance.’</p>
HO2: Optimising the use of small housing sites	163–8	As requested in our regulation 18 consultation response, references to parking stress and requirements have been removed, which is welcomed. We now consider this policy to be in line with the London Plan.
HO5: Accommodation for older people	185	<p>Part Be.iii. should refer to policy TR4 (Parking), to clarify that parking considered for accommodation for older people should not be above the maximums in TR4: ‘Access, parking and servicing arrangements, including for all types of vehicles expected to access the development, in accordance with Policies TR4 (Parking) and TR5 (Deliveries, Servicing and Construction).’</p> <p>The last sentence of paragraph 7.52 should also be similarly amended, to clarify that parking rather than being ‘adequate’ should not be above the maximums in TR4 (Parking): ‘Developments must also make adequate provision for access, parking and servicing for vehicles, with drop-off points for taxis, mini-buses and ambulances located near the building’s principal entrance. Parking should be within the maximums in Policy TR4 (Parking).’</p>
HO10: Gypsy and traveller	204	Part Bc. should be amended to clarify that any parking provision should rather than ‘adequate’ as

³ content.tfl.gov.uk/streetscape-guidance-2022-revision-2.pdf

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accommodation		currently in HO10 be assessed through and subject to the maximums in policy TR4 (Parking): 'Access, parking and servicing arrangements for all vehicles likely to use the site, including emergency services, with any parking provided in accordance with TR4 (Parking)' .
EC9: Railway arches	243–4	We welcome the inclusion of the need to consult with TfL in paragraph 8.52, but request the following re-wording to protect the BLE: 'Applicants will be expected to consult Network Rail and Transport for London on development and design options in order to ensure there is no adverse impact on the public highway and rail network, or impacts that may preclude, prejudice or delay the delivery of planned transport infrastructure, including the Bakerloo line extension.'
GR2: Open space	317–28	The policy wording would appear to be more flexible for allowing works on open spaces, subject to alternative provisions or improvements. However, the policy should be amended to make explicit that temporary works relating to the BLE, such as construction and enabling works, would be an acceptable form of development.
SD6: Improving air quality	369–72	<p>Policy SD6 is supported, and we welcome the added reference to the Healthy Streets Approach in the supporting text of the policy.</p> <p>As stated in our regulation 18 comments, given car use is one of the main contributors to NO_x, PM_{2.5} and PM₁₀ emissions, the impact of developments with car parking and the resulting increase in car use should be explicitly referred to as well. It is recommended the last two sentences of paragraph 11.33 are amended: 'The Healthy Streets Approach should be used wherever possible to help address poor air quality. As car use is one of the main contributors to NO_x, PM_{2.5} and PM₁₀ emissions, where developments provide car parking, the resulting impact on car use should be considered. Development proposals will be considered taking into account individual and cumulative impacts of development in an area, consistent with national policy.'</p>
TR1: Sustainable transport	403–7	<p>Policy TR1 is supported. In particular, we welcome the changes in TR1 which refer to 'enabling' mode shift and walking and cycling. We also welcome the addition to TR1D of 'd. Expansion of cycle hire' in response to our comments in the regulation 18 consultation.</p> <p>Part C: We welcome the intention to safeguard sites for construction and delivery of the critical transport improvements and permanent infrastructure, to enable the borough to deliver its spatial objectives.</p>

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		<p>However, not addressed from our comments made on the regulation 18 local plan, part C refers to ‘safeguarding’. A distinction should be made between the ‘safeguarding’ as a matter of local plan policy, and the formal safeguarding directions made by the Secretary of State for Transport on 1 March 2021 in respect of the BLE. The latter must be complied with under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO 2015). In relation to the former, we acknowledge there can be a form of policy-based ‘safeguarding’ on a strategic basis via the London Plan and at a more detailed local level via this local plan, but we consider further specificity would be clearer. In particular, the current draft local plan is not sufficiently granular and should set out more clearly the reasons for the policy-based safeguarding and the implications thereof on a site-by-site basis. This should cover stations, work sites, the line and corridor and associated works (more detail of which TfL can provide upon request).</p> <p>Further to our regulation 18 request, that explanatory paragraph 12.10 is now included in the local plan is supported, including its details of the Secretary of State’s safeguarding directions, that these have been included on the policies map, that the BLE will make a higher number of homes possible within the existing and potential Opportunity Areas, and that it will deliver a transport interchange at Lewisham along with the benefits of this.</p> <p>Throughout the local plan there is reference to both the ‘Secretary of State’ and ‘Ministerial’ safeguarding directions. A single reference should be used to provide clarity. ‘Secretary of State’ is preferable, in accordance with the wording of the directions and the DMPO 2015.</p> <p>Table 12.1 Indicative list of strategic transport schemes: The table does not define the timeframes associated with each project. In particular, for the BLE, ‘medium’ is both ambiguous and implies a shorter than anticipated delivery timescale. ‘Metroisation’ as described in the Mayor’s Transport Strategy would apply to all National Rail services in south and southeast London, rather than to the London Overground, and the table should be amended to read: “‘Metroisation’ of London Overground National Rail services’. The table should additionally be amended to read: ‘Surrey Canal Road-station’.</p> <p>We note the removal of ‘New Cross to Lewisham Overground extension’, however this still appears in the Infrastructure Delivery Plan. This scheme should be removed from the Infrastructure Delivery</p>

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		<p>Plan for consistency with the local plan.</p> <p>Part D: We support the Council’s commitment to improving the public transport network, including improving bus priority and bus stop infrastructure in Policy TR1D. TfL’s Bus Action Plan⁴ was published in March 2022, and we would suggest the Council include reference to the Bus Action Plan in the explanatory text.</p>
TR2: Bakerloo line extension	409	<p>This policy supports the BLE and this is welcomed.</p> <p>Part B: The following amendments are recommended, for clarity: ‘Development proposals must demonstrate that they will facilitate and not preclude the delivery of the BLE, with reference to Policy TR1 (Sustainable transport and movement). They Development proposals must take into account taking into account Ministerial safeguarding Directions the Secretary of State for Transport BLE safeguarding directions which were issued on 1 March 2021, the supporting safeguarding directions guidance, and relevant Mayor of London / Transport for London infrastructure requirements and/or feasibility studies associated with BLE phases 1 and 2, and should consult with relevant transport bodies at the an early stage of the planning process.’</p> <p>Part C: Our view is that only sites in the safeguarded zone (that is, the area to which the Secretary of State’s safeguarding directions apply) should need to demonstrate how they address the infrastructure requirements of BLE such as running tunnels, noise and vibration. That this would be required by the policy for any development within 400 metres of a proposed station or safeguarded zone is unnecessary.</p> <p>Furthermore, requirements for transport assessments and transport statements are already set out in local plan policy TR1F (Assessing and mitigating transport impacts) and London Plan policy T4B (Assessing and mitigating transport impacts), and we consider that these should be relied on for assessing sites near the BLE, rather than specifying through this policy any distance from stations that should be considered. For strategic developments, for example, the impact on the nearest</p>

⁴ content.tfl.gov.uk/bus-action-plan.pdf

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		<p>stations should be assessed in a transport assessment and mitigated, regardless of whether they are any specified distance from a development site. We would welcome further discussion on this point in particular, as setting a threshold of 400 metres would be an unhelpful precedent and something we would object to strongly.</p> <p>As such, the text in part C should be amended to remove the reference to 400 metres, and subsequently the last two sentences of part C regarding potential public realm and transport infrastructure enhancements should be moved to part D of the policy because they should apply to beyond the safeguarded area, as follows:</p> <p>C Development proposals on sites located within 400 metres of a proposed the Bakerloo line BLE station or safeguarded area, <u>under the Secretary of State for Transport’s BLE safeguarding directions</u>, must <u>(unless exempted in those directions)</u> demonstrate that <u>the proposed</u> development will not preclude or delay the delivery <u>or operation</u> of the BLE, will not lead to excessive cost in the delivery <u>or operation of the BLE</u>, and <u>must will</u> be compatible with the BLE <u>during delivery and operation</u> (for example, in relation to vibration from the tunnels), both during construction and in operation. Foundation and basement design will be particularly critical for over tunnel alignments, ground level needs at stations and for other work sites. Development proposals must also be designed to optimise the accessibility provided by the introduction of the BLE into the local area. This may include provision for new or improved public realm and transport infrastructure enhancements.</p> <p>D Development proposals should optimise the use of land and capacity of sites taking into account the BLE and future improvements to Public Transport Access Levels enabled by its delivery. The Council will seek to ensure that development on sites in proximity to existing, planned or potential future Bakerloo line stations is appropriately phased in order to secure the most beneficial use of land, particularly to help meet Lewisham’s housing needs.</p>

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		<p><u>Development proposals must also be designed to optimise the accessibility provided by the introduction of the BLE into the local area. This may include provision for new or improved public realm and transport infrastructure enhancements.</u></p> <p>The explanatory paragraph 12.12 should also be amended to clarify the safeguarding requirements and separate the matters of public realm and transport infrastructure enhancements from safeguarding, in accordance with the above recommendations on parts C and D of the policy.</p> <p>Part D: It would be helpful to set out in more detail when phasing may be required and what will be required from the developer in terms of documents and actions.</p>
TR3: Healthy streets as part of healthy neighbourhoods	415	<p>Part C: The 'key movement corridors' are not defined in this policy. It would be helpful to include a table or figure identifying these, so that they can be coordinated with other walking and cycling routes referred to in part D of the policy. This will enable developments to include appropriate Healthy Streets improvements as part of the scheme or secured through section 106 or section 278 agreements. A plan-led approach to delivery will enable coordination between development and funding for improvements.</p> <p>The approach to transform major arterials (including portions of the A20 and the A205 South Circular) in policy TR3 and explained in paragraph 12.17 in line with Healthy Streets is strongly supported, but more specificity would be encouraged in identifying what these public realm improvements and new walking and cycling infrastructure would look like.</p> <p>Part I regarding active travel training and funding is welcomed and could be supported by adding the following to paragraph 12.21: '<u>Funding can be secured from developments for projects and programmes such as cycle training to support this.</u>'</p> <p>Part G: A reference to Low Traffic Neighbourhoods as a type of intervention could be added to the last sentence of this part: '<u>This may include interventions to reduce, re-route or calm vehicular traffic (particularly around schools and other community facilities) and/or lower speed limits in localities, as well as to enhance the quality and safety of the walking and cycle environment, or to create Low Traffic Neighbourhoods</u>'.</p>

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TR4: Parking	419	<p>Part A: This approach to prioritising car-free and car-lite development is in accordance with policy T6 (Car parking) of the London Plan and is supported.</p> <p>It is recommended that the meaning of car-lite is clarified in the policy: ‘In line with the London Plan, car-free development should be the starting point for all development proposals in places that are, or are planned to be well-connected by public transport, with developments elsewhere designed to be car-lite, with parking minimised as far as possible.’</p> <p>Part B: It is welcomed that car-free development is now proposed to be supported in areas of lower PTAL, subject to availability of alternative transport infrastructure. However, the need for a requirement for locations to be ‘highly accessible’ in addition to ‘well-connected’ already introduced in part A is not supported. ‘Well-connected’ is considered sufficient, and the difference between the two terms is not explained. The first sentence of part B should therefore be amended to: ‘Development proposals for car-free development will be supported in locations well-connected by public transport. where they are located in highly accessible and well connected locations.’</p> <p>The items a.–d. under Part B are supported as being appropriate additional locations for car-free development. However, the structure of the list in part B is unclear: item a. ends with ‘or’, item b. ends with ‘and’ and item c. ends with no conjunction. The relationship between items a.–d. should be clarified. For item c., while controlled parking zones are strongly supported, London Plan policy T6C (Car parking) states that a lack of controlled parking zones should not prevent development.</p> <p>Parts C and D: These are in accordance with the London Plan parking maximums and disabled parking requirements and so are supported. The following should be added to Part D to reinforce London Plan policy T6.1H (Residential parking): ‘Residential disabled persons parking should not be allocated to specific dwellings, so that it does not end up being used as general parking if there is a turnover of residents.’</p> <p>Parts E and F: The cycle parking requirements accord with the London Plan and so are supported. The requirement for provision of cycle hire and cargo cycle space for certain developments where</p>

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		<p>feasible is supported.</p> <p>Part H: The requirement of car-free development to be parking permit free is welcomed.</p> <p>Parts I to K: The electric vehicle charging and parking design and management plan (PDMP) requirements are consistent with the London Plan and so are supported. The following should be added to Part I to reinforce London Plan policy T6.1B (Residential parking): <u>‘Parking spaces within communal car parking facilities should be leased rather than sold.’</u></p> <p>Explanation of the purpose of PDMPs should be added as a new paragraph 12.29: <u>‘PDMPs allow consideration of the provision of electric vehicle charging points, how disabled persons parking spaces will be provided upon request, how space might be converted in future as needs change, strategies to reduce car parking over time as sustainable transport infrastructure is improved and car ownership levels decrease, and how cycle parking areas will be designed and managed.’</u></p> <p>Paragraph 12.24: The meaning of this explanatory text is somewhat unclear. It notes that the Council will work with stakeholders including TfL and National Rail to ‘address step-free access and deliver this provision which is necessary for inclusive and well-connected neighbourhoods.’ It is unclear what ‘this provision’ refers to. If it refers to step-free access, this would be supported, but the wording and placement of the text in the explanatory text of policy TR4 (Parking) implies that it may be about car parking. If this is the case, the lack of step-free access does not justify higher car parking provision on high PTAL sites. The paragraph should be revised and moved or deleted from the plan.</p> <p>It is recommended that the issue of car clubs is separated from that of electric vehicles in paragraph 12.27, to better indicate the potential benefits of car clubs, with additional guidance on how car clubs can be used to lower overall levels of car parking and encourage sustainable transport choices as well as noting their limitations and circumstances in which they would not be supported. Paragraph 12.27 should be amended: <u>‘The use of car clubs and electrically charged or Ultra-Low Emission vehicles can provide an alternative to car ownership and conventional gas fuelled vehicles. Development proposals must make appropriate</u></p>

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		<p>provision for rapid electrical vehicle charging points, also having regard to the Council's Low Emission Vehicle Charging Strategy. However in light of the climate emergency the use of car clubs and Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality.'</p> <p>A new paragraph 12.28 should provide explanation on car clubs, such as: '<u>Car clubs can be useful in supporting car-free development. The best way to implement them is with an associated reduction in the overall number of parking spaces in an area. Simply adding car club cars to areas with lots of parking is not an effective way to reduce car ownership or use and is rather more likely to increase the dominance of vehicles on the streets In new developments, car clubs should be deployed as a means to reduce the overall volume of parking and where they can provide for occasional car use for households that are prevented from owning their own car, where parking levels are very low, and they should include electric vehicle charging points.</u>'</p>
TR5: Deliveries, servicing and construction	423	The approach to requiring sustainable freight, off-street deliveries and operational parking, and demonstration of this through delivery and servicing plans, is supported.
TR6: Taxis and private hire vehicles	425	Part Ac. currently could imply that any loss of general on-street parking for use by taxis or private hire vehicles would be unacceptable. However, the use of on-street space for these purposes may result in fewer car trips and could provide additional flexibility which accords with the London Plan Good Growth objective of making the best use of land. Part Ac. should be rephrased to remove reference to on-street parking: 'It is suitably demonstrated that there will be no adverse impact on amenity and the highway network, including existing on-street parking provision '.
TR7: Digital connectivity	427	Part De.: Requiring a minimum residual footway should apply to any road, not just 'main' roads. In addition, it would be helpful if the policy referred to what a suitable minimum width would be or how this could be determined. This part should be amended to: 'If located on a main road or walking route, a minimum residual footway is provided, to ensure comfort and safety for all road users '.

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		<p>In paragraph 12.44 of the explanatory text, the reference to 1.8m should be replaced with 2m, which is the minimum set out in the Manual for Streets⁵, Inclusive Mobility⁶ and TfL's Streetscape Guidance.⁷ The reference to ensuring appropriate pedestrian flow is supported and TfL guidance should also be referenced to support this: 'The Government guidance documents Manual for Streets and Inclusive Mobility, as well as Transport for London's Streetscape Guidance and Pedestrian Comfort Guidance⁸ should be referred to for guidance on appropriate residual distances where development is located on a main road or walking route. In town centres and other high traffic areas, the minimum residual distance of 1.8 2 metres may not be sufficient to enable appropriate pedestrian flow, and the minimum width will be determined based on the number of pedestrians per square metre and pedestrian flows per minute.'</p>
Lewisham's Central Area site allocations		
1: Lewisham Gateway	458	<p>This site is in PTAL 6b and the existing planning permission allows for the provision of 500 car parking spaces. There is no mention of cycle parking in this phased development. Since there are various phases of this development, we encourage any future changes and planning permissions be geared towards car-free development for both residential and non-residential uses. A reduction in car parking provision will achieve better air quality in this air quality focus area, as well as make better use of land and reduce costs. Dedicated cycle lanes should also be considered to improve safety and encourage people to cycle.</p>
5: Land at Conington Road and Lewisham Road (Tesco)	471	<p>Paragraph 14.45.9 which requires the retention or re-provision of the bus stop and stand facility that are currently provided on this site is supported.</p>
6: Thurston Road Bus Station	474	<p>The existing bus stand at Thurston Road is the identified site for a BLE station box. The layout of the new station is unlikely to permit a sufficient bus stand to return to the site once the station works are complete. However, this has not been technically assessed and proven, although it is highly likely to be the case. Current feasibility studies will help identify what scope exists to return</p>

⁵ assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf, paras 6.3.22–6.3.23.

⁶ assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1044542/inclusive-mobility-a-guide-to-best-practice-on-access-to-pedestrian-and-transport-infrastructure.pdf, p. 28.

⁷ content.tfl.gov.uk/streetscape-guidance-2022-revision-2.pdf, pp. 205–10.

⁸ content.tfl.gov.uk/pedestrian-comfort-guidance-technical-guide.pdf.

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		<p>the bus stand back to Thurston Road. The lack of provision for a temporary bus stand within the local plan is concerning.</p> <p>Following extensive investigation work and meetings with Lewisham, Molesworth Street Car Park had been identified as a preferred site to locate a bus stand during the construction of the station. While in the regulation 18 version of the local plan Molesworth Car Park was referred to as a site allocation, it has since been removed. We had understood that the use of the car park as a temporary bus stand would be identified in the site allocations, similar to that shown in the regulation 18 local plan. The removal of this site allocation risks the protection of land in the town centre to facilitate a bus stand. The delivery of a temporary bus stand within the town centre is critical to permitting the delivery of the BLE and operation of the bus network in this area. Sufficient reassurances are needed within the local plan to enable TfL to deliver the strategic infrastructure widely documented within the local plan.</p> <p>We strongly recommend that the local plan identifies and commits to potential alternative sites which could accommodate a future bus stand within the locality of the Gateway. The existing bus services are relied upon and primarily used by Lewisham residents for travel to work, for shopping and for other needs in the borough and must be considered alongside promoting the delivery of the BLE.</p> <p>TfL asks that provision is made for accommodating a bus stand within the site allocations.</p>
7: Lewisham Retail Park, Loampit Vale	476	Paragraphs 14.52.2 and 14.53.5 that require that development not prejudice the delivery of the BLE and identify that the BLE could affect redevelopment of the site are supported.
13: PLACE/Ladywell (former Ladywell Leisure Centre)	491	<p>The site allocation should emphasise the need for comprehensive development of the whole site, with concern that the current application under consideration does not consider the replacement of the existing temporary building and raises some conflicts with its future replacement.</p> <p>Paragraph 14.82.2 should be more specific about proposals for the very wide footway in front of the temporary building, since at present it is used for unlawful parking. Retention of this very wide footway is only a beneficial public asset if it is planned, designed and managed appropriately. It should not be used for car parking.</p>
18: Catford Island	503	Paragraph 14.107.2: The requirement to not prejudice the delivery of the realignment of the A205

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		<p>is supported, but this should be extended to include working with TfL to deliver elements of the improvements along the sites' frontages, including through section 278 and section 106 obligations: 'Development must not prejudice the delivery of transport infrastructure, including public realm enhancements associated with the re-alignment of the A205. <u>Applicants should work in partnership with TfL to deliver elements of the improvements along the sites' frontages.</u> The siting of buildings must ensure the traffic and transport improvements along the South Circular at Sangley Road, Plassy Road and Brownhill Roads can be implemented in full.</p> <p>12 Brownhill Road has been included in the site allocation but is a small, privately owned housing site. It may be unnecessary to include this site within the allocation. Note that the 12 Brownhill Road site is rectangular and does not include the triangle-shaped area behind the hoarding on the TfL site adjacent at the corner of Brownhill and Plassy Roads.</p> <p>The development requirements in paragraph 14.107 should make specific mention of permeability through the wider site, including across the various land ownerships, rather than just connections to the surrounding street network. Paragraph 14.107.3 should be amended as follows: '<u>The site must be re-integrated with the surrounding street network to improve access and permeability in the local area, and to better integrate the site with the Primary Shopping Area. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors, as well as permeability between and through the various land ownerships that make up the site.</u>'</p>
19: Laurence House and Civic Centre	506	<p>It may be helpful to note that Laurence House is a temporary building at the end of paragraph 14.110: '<u>Lawrence House was designed as a temporary building to enable redevelopment following the A205 realignment.</u>' The development guidelines in paragraph 14.112.6 should be amended to refer to links to the stations: 'Development should improve opportunities for walking, cycling and other active travel modes along A205 Catford Road, <u>including to Catford and Catford Bridge stations,</u> contributing to the A21 Healthy Streets Corridor.' The replacement and improvement of bus facilities lost due to the realignment outside Laurence House, the Civic Centre and Broadway Theatre should be included as a development requirement in paragraph 14.111.4: 'Applicants must work in partnership with Transport for London to deliver the realignment of the A205 South Circular, ensuring it is integral to the development of the site. <u>There must be provision for buses and replacement and improvement of bus facilities lost due to the</u></p>

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		realignment.'
20: South Circular	509	We support the inclusion of this site allocation for the re-routing of the A205 South Circular, which will support the regeneration of the town centre and improvements to walking, cycling and public transport.
21: Wickes and Halfords, Catford Road	511	This is a large site and that its development should be comprehensive (14.117), and in accordance with the Catford Town Centre Framework (13.119.1), is supported. The references to connections to Waterlink Way, routes to Catford and Catford Bridge stations, rationalisation of vehicle entrances to the site and connections through the railway arches in the development requirements (14.119) and development guidelines (14.120) are supported. The connections to the stations and through the railway arches should consider pedestrian crossings on the A205 and A212 roads. Paragraph 14.120.8 should therefore be amended as follows: 'Proposals should investigate and maximise opportunities to facilitate links through the railway arches and across the A212 as well as links across the A205.'
Not allocated: Big Yellow Storage, 155 Lewisham Way, London SE14 6QP and Wearside Depot, Wearside Road, London SE13 7EZ		These sites are not identified as site allocations but are critical for the delivery of the BLE. The formal safeguarding directions will give a degree of protection to the sites and future development. However, identifying future uses of the sites through a site allocation in the local plan, including for BLE infrastructure would best protect the interests of the BLE, and new London Underground services to Lewisham.
Lewisham's North Area key spatial objectives	523	While objective 9 refers to the expansion of cycle hire throughout the North Area, additional specific locations where it could be added should be referenced in objectives 10 and 11, as below. 10: To this objective should be added: ' Expand the cycle hire scheme along the River Thames and Deptford Creekside.' 11: To this objective should be inserted: 'Protect and enhance open and green spaces, including waterways. Continue to deliver and expand the North Lewisham Links, a connected network of high-quality walking routes and cycleways that link these spaces, including supporting the potential for any cycle hire expansion along these routes. Ensure these routes address existing barriers to movement, such as those caused by the tangle of railways and major roads.'
LNA2: New Cross Road / A2 corridor	528	The following text should be added to Part C: ' Cycle hire provision should be expanded along New Cross Road.'
Lewisham's North Area site allocations		

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9: Surrey Canal Triangle Mixed-use Employment Location	562	<p>Note that under paragraphs 15.65.6 and 15.65.9 new walking and cycling routes would be supported by TfL but they should be designed to be compatible and integrated with the stations.</p> <p>We request a commitment to the delivery of a bus interchange including stands, stops, circulation system and driver facilities. This should be adjacent to the proposed Surrey Canal station. Before the station is operational, a temporary bus stand with driver facilities is required on Landmann Way to serve phase 1 of the Renewal development and other nearby schemes in Lewisham, such as Apollo. The development requirements in paragraph 15.64.8 should therefore be amended as follows: ‘Provision for the new transport infrastructure within the site, including a new Overground station at Surrey Canal Road and an accompanying walking and cycle bridge and bus interchange, as well as temporary bus stand before the station is operational, in partnership with TfL and infrastructure providers.’ This would ensure the development has links to central and inner London including Convoys Wharf, Deptford, New Cross and the Lewisham town centre.</p>
11: Former Hatcham Works, New Cross Road	569	<p>This allocation provides strong protection for use of the site as a new BLE station. Lewisham should consider using the local plan for safeguarding lands surrounding the site, including that of the existing railway station (New Cross Gate).</p> <p>The time period for delivery starts in 6–10 years. We question this timescale, given the site is protected for BLE construction, the period for which is likely to extend beyond this.</p> <p>This site allocation should require car-free development.</p>
Lewisham’s East Area site allocations		
3: Leegate Shopping Centre	620	<p>‘Planning status’ should be updated to include planning application DC/22/126997, which is currently under consideration.</p> <p>There should be an additional development requirement: ‘5. Retention of existing mature trees.’ This would ensure the retention of the mature trees on the Eltham Road frontage of the site, which are a positive feature of the area.</p>
LSA1: South Area place principles	643	<p>Part C: The phasing of development where the BLE will materially impact on travel behaviour is supported. Lewisham should support this by setting out how its evidence base will highlight where shortcomings exist or may become apparent as development comes forward.</p>

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LSA3: Bell Green and Lower Sydenham	648	<p>Part A states 'The designation of an Opportunity Area at Bell Green and Lower Sydenham in a future review of the London Plan will be strongly supported by the Council.' Subject to any future decision to extension the Bakerloo line beyond Lewisham to Hayes and Beckenham Junction, such a designation would be supported in principle as it would enable the extension to better support the delivery of new homes and jobs that would otherwise be constrained by limited public transport capacity. Any build out of the potential future Opportunity Area would need to ensure that it could accommodate the provision of the future BLE, including all necessary supporting infrastructure.</p> <p>It is recommended that the first sentence of paragraph 17.11 is amended, as designation would require further consideration by the Greater London Authority and TfL, and the extent of this consideration does not currently amount to the area being 'poised' to become an Opportunity Area: 'The Bell Green and Lower Sydenham area is poised to become one of London's next Opportunity Areas, and the Council will support this the designation <u>of the Bell Green and Lower Sydenham area as an Opportunity Area</u> in a future review of the London Plan.'</p> <p>Part C implies that land is 'safeguarded' for the BLE to Hayes. A distinction should be made between the 'safeguarding' as a matter of planning policy, and the formal safeguarding directions made by Secretary of State for Transport on 1 March 2021 in respect of the BLE, which, as per our comments on policies TR1 (Sustainable transport and movement) and TR2 (Bakerloo line extension), must be complied with under the Town and Country Planning (Development Management Procedure) (England) Order 2015 and relate to phase 1 of the BLE.</p> <p>The site allocation is unclear as to what will be safeguarded beyond a station. Although not yet confirmed, the BLE would likely require a stabling site in the vicinity of either of these two sites if Phase 2 were to come forward. TfL would welcome specific wording about a stabling/maintenance facility being included within the site allocations for these areas. Alternatively, we would welcome the ability to include this in the next review phase of the local plan.</p> <p>The principles set out in the policy by way of protecting future BLE infrastructure requirements are welcomed.</p>
LSA4: A21 corridor / Bromley Road	651	Part D should refer to improving walking, cycling and bus connectivity to National Rail and DLR

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		stations, to deliver broader connectivity.
Lewisham's West Area site allocations		
2: 6 Mantle Road	710	We welcome paragraph 18.22.2 which includes consultation with TfL on railway station developments.
5: Land at Forest Hill Station west (Devonshire and Dartmouth Roads)	716	Public realm improvements and consideration of development of the car park would be strongly supported.
6: Perry Vale Locally Significant Industrial Site	718	Development of the car park would be strongly supported.
11: Land at Sydenham Road and Loxley Close	729	Paragraph 18.60.1 should refer to Policy TR4 (Parking), to clarify that parking should not exceed the maximums in that policy: 'Development should make a more optimal use of land by considering options for the car park, including rationalising the existing level of provision, taking into account needs of visitors and businesses along with public transport accessibility levels, and in accordance with the maximums set out in Policy TR4 (Parking).'
DM2: Infrastructure funding and planning obligations	743	<p>Part E lists a number of issues that may be addressed through planning obligations, but there is currently no indication of the priority should financial viability issues arise. While paragraph 19.12 notes the priority given to affordable housing and transport infrastructure obligations in the London Plan, Part E should be amended to make it clear that affordable housing and transport infrastructure share joint highest priority, as set out in policy DF1D (Delivery of the plan and planning obligations) of the London Plan.</p> <p>Government guidance indicates that policy requirements for planning obligations should be clearly set out so that they can be accounted for by developers. While DM2 refers to planning obligations in connection with 'public transport improvements', TfL consider it should explicitly refer to the BLE and the potential for it to be funded in part from the Community Infrastructure Levy (CIL) and planning obligations. It remains our view that it would be advantageous for Lewisham to commit to identifying how planning obligations can support the funding of the BLE, as there will be an expectation that significant developer contributions would be needed alongside, for example, other borough funding. Similarly, a dedicated proportion of CIL or other levy could alleviate uncertainty for developers and would reflect the relationship between the BLE and its integral role in unlocking developments in Lewisham.</p>
DM7: Monitoring and review	755	Ref. LPI14: The text should say 'London Plan' rather than 'draft London Plan'.

Policy	Page	Comment/Amendment
Infrastructure Delivery Plan		
5.1.6	66	The number of new DLR trains should be corrected as follows: 'In 2017 TfL began the process of replacing the existing DLR trains with 57 54 new ones.' The new trains will begin to rollout in 2024, though the specific date for the uplift to 30 trains per hour is not yet confirmed.
5.1.13	67	<p>It is our understanding that all trains that pass through Lewisham station stop at that station. If this paragraph is instead referring to trains that bypass Lewisham on separate lines, this should be clarified.</p> <p>The 'New Cross to Lewisham Overground extension' is not currently being progressed by TfL, with the BLE being our preferred scheme in this location.</p>
5.1.42	72	This should be updated as follows: 'From October 2021 the The ULEZ will be expanded to includes all areas of the borough to the north of the South Circular. In the longer term the Council will assess the feasibility of seeking to further expand the ULEZ to cover the entire borough.'
Strategic infrastructure list for transport infrastructure	76	<p>The 'indicative timescale for project delivery' for the 'Bakerloo line extension and upgrade' should be shown as 2035–2045 rather than 2020–2035.</p> <p>The 'New Cross to Lewisham Overground extension' is not currently being progressed by TfL, with the BLE being our preferred scheme in this location.</p>



Historic England

Our ref: PL00043942

Planning Service
Laurence House
1 Catford Rd
Catford
London SE6 4RU

By email: localplan@lewisham.gov.uk

27 April 2023

Dear Planning Service Team

London Borough of Lewisham – Regulation 19 Consultation on draft Local Plan

Thank you for the opportunity to comment on the above consultation document and for the agreement of an extension to the deadline for responses. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). They focus in particular on whether the draft Plan makes sufficient provision for the conservation and enhancement of the historic environment in Lewisham through strategic policies (NPPF, para 20), whether the identified evidence base for the historic environment is relevant and up to date (para 31) and if it therefore sets out a positive strategy for its conservation and enjoyment (para 185).

As with the previous consultation version of the draft Plan, we note and welcome the focus throughout on the importance of future growth being character-led, as well as the detail on heritage across a broad range of relevant policy areas. We also note and welcome the greater detail and clarity in relation to building heights and locations in this consultation version, together with other amendments to the text in various areas. We consider that as a result the



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Historic England

draft Plan offers an effective framework for managing the effects of new development on the historic environment, and our comments on this iteration of the Plan are limited as a result.

In relation to building heights, we welcome the definition of a tall building in the borough, together with maximum heights within identified tall building suitability zones as set out in policy QD4. While we note the text at para 5.33 that such maximum heights are not automatically acceptable within the entire zone, we consider that this should also be made clear within QD4 itself.

We note that paragraph 8.53 relating to local character in relation to the borough's town centres has been deleted. While this is indeed covered in part elsewhere in the draft Plan, we would suggest that a reference to conserving historic character within town centres either directly in policy EC11 or its supporting text would be useful, not least as these areas often have high potential for significant archaeology. This reference should also make clear that conservation area appraisals and/or management plans should be consulted on relevant proposals.

We note the reference to retrofitting measures to existing buildings in policy SD2 and supporting text at paragraph 11.11. We consider it would also be useful to make clear at either point that historic buildings may often need bespoke or non-standard interventions to reduce energy consumption and carbon emissions, as well as signposting current Historic England guidance.

I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

In the meantime, please do not hesitate to contact me should you require any further information.

Yours faithfully



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NHS London Healthy Urban Development Unit

Planning Policy Team
London Borough of Lewisham
Laurence House
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London SE6 4RU

25th April 2023

Dear Policy Team

Lewisham Local Plan Proposed Submission Draft Regulation 19 NHS HUDU response to consultation

Thank you for the opportunity to make representations on Lewisham's proposed Submission Draft Local Plan. This response has been developed in consultation with the South East London Integrated Care Board (SELICB) and NHS providers. We requested an extension to the timescale to respond due to pressures on the NHS, however, being advised that the Inspector is only required to consider those responses submitted within the formal consultation period we are ensuring we meet this, with a request for further discussion in relation to revisions of the Council's Infrastructure Delivery Plan.

The ICB and providers have been reviewing the health estate required to meet the needs of Lewisham's growing and changing population and is working closely with the Council to identify areas for joint work and collaboration.

We are pleased to note that most of our proposed amendments to the Regulation 18 Local Plan have been taken on board and incorporated in the current document. This includes the introduction of new Policy DM6 Health Impact Assessments, the inclusion of the additional clause covering public safety within Policy QD4 Tall Buildings, amendments to QD7 Amenity and Agent of Change, and adding reference to emergency vehicles in Policy TR5 Deliveries, servicing, and construction.

Our comments at this stage focus on amendments that we consider necessary for the plan to be found sound and for clarity and ease of reference which is important for effective use of the plan by developers and stakeholders.

Policy CI 1 Safeguarding and protecting community infrastructure

In our response to the Council's Regulation 18 consultation we requested that the reference is expanded to *social and community infrastructure*. Social infrastructure is the terminology widely used in the London Plan and other strategic policy documents. We note this broader term is included within the Council's draft Plan under Policy DM2 Infrastructure Funding and Planning Obligations. Therefore, for greater consistency with the London Plan and to aid clarity and ease of understanding

it would appear sensible to use social and community infrastructure in all policy wording throughout the Plan.

We raised concern in our earlier response that the requirement under London Plan Policy S1 for boroughs to undertake an assessment of social needs had not been fully met. While additional evidence has been undertaken in relation to local and town centres there appears not to have been any undertaken in relation to social and community infrastructure. Ideally this would be in place for the submission draft plan, and if not as soon as possible. This is important to ensure the rapid and large-scale development in the borough is accompanied not only by sufficient health and education infrastructure but also by the local community infrastructure which is vital to health and wellbeing of individuals and communities. The increase in specialist housing, whether primarily for the young with student housing, and co-living or for older residents through extra care also adds to the importance of offering both formal and informal spaces where communities can come together, and different communities can interact to support community cohesion and reduce social isolation. We would be keen to contribute to this work alongside the Council and key stakeholder including the community and voluntary sector.

Reference is made to the IDP, however, the IDP does not detail the range of local infrastructure within the voluntary and community sector, and the informal meeting places which are made possible through the design of open space and the public realm where social interaction is encouraged and supported. Further comments in relation to the IDP are made later in this response.

DM7 Monitoring and Review Table 19.

We welcome the expansion of the monitoring indicators now under DM7 Monitoring and Review Table 19.1. However, how the reduction in health inequalities is measured should be more detailed. Paragraphs 28-29 of the draft plan highlight key indicators of deprivation and inequalities and it could be appropriate to use one or more of these and record spatial differences as the objective of reducing inequalities will require the Council to understand the impact of the plan on different neighbourhoods. It would also be helpful for indicators to include targets so that progress against these can be kept under review rather than simply a number for many individual indicators.

Policy DM6 Health Impact Assessments

While we very much welcome the inclusion of this policy we suggest additional wording to ensure the health benefits set out in HIAs and the minimisation and mitigation of potential adverse impacts are secured. Reference as in other policies to use of planning conditions or obligations should be incorporated. This will help ensure the health and wellbeing elements are delivered as part of the overall scheme.

Policy LSA2 Strategic Area for Regeneration

In order to ensure the objectives of the Local Plan are delivered additional wording should be provided before Clause B b as it is insufficient to 'seek opportunities to' and we propose amended wording to read; *developers will be required to* b. Plan positively for social infrastructure to meet local needs, particularly community facilities and services catered to children and young people *and older people*;

The additional reference to older people is required given the forecast growth of the over 65s within Downham Ward over the plan period. The GLA's population explorer tool indicates that the population of Downham ward aged 65 years and above will increase from 1916 in 2020 to 2999 in 2040 an increase of 56%.

DM2 Infrastructure funding and planning obligations

This policy references social and community infrastructure which is welcomed as it provides consistency with London and other strategic policy and captures the full scope of infrastructure supporting local residents and the wider community. If this phrase is used in the policy then providing examples including health infrastructure (primary, community, mental health and acute) within the explanation would be welcomed, or alternatively health infrastructure could be listed as a specific line in the policy.

The Infrastructure Delivery Plan

Reference is made throughout the plan to the IDP including for example in Policy CI 1 Clause B where reference to development demonstrating that they meet additional demands particularly where "there is an identified need for additional provision, as set out in the Infrastructure Delivery Plan". If additional weight is to be given to those areas within the IDP then the Council must ensure that this is kept up to date. The current IDP, dated September 2022, relies on evidence gathered sometime prior to this. We are therefore keen to work with the Council to update the health section of the IDP in the coming weeks to ensure it is up to date as possible before submission to the Secretary of State.

Site Allocation – Leegate Centre

This allocation includes provision of a health facility; however, it is important that if this is to be included within the allocation that further detail is included to reflect that the requirement for health would incorporate ground floor accommodation with access for emergency vehicles, blue badge and other parking for frail patients provided on an affordable and sustainable basis.

We look forward to continuing our to work closely with the Council.

Yours sincerely,



Mary Manuel
Head of the London NHS Healthy Urban Development Unit

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m/r Direct Dial 020 3045 3414
y/r Date 18 April 2023

rhoda.hayashi@bexley.gov.uk

The person dealing with this matter is Rhoda Hayashi

Planning Service
Laurence House
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London, SE6 4RU

RE: Regulation 19 public consultation for the Lewisham Local Plan – proposed submission document

Dear Christopher,

Thank you for the opportunity to comment on the Lewisham Regulation 19 Draft Local Plan. London Borough of Bexley (the Council) considers that the draft plan is a comprehensive, considered and carefully evidenced policy document and therefore supports the broad objectives of the plan. In general, the Council would support explicit references to partnership working with neighbouring planning authorities across the London sub-region particularly with strategic matters likely to cross administrative boundaries, including transport, sustainable waste management, green infrastructure including the South East London Green Chain, and mitigating climate change (including flood risk management). We look forward to continued partnership working with London Borough of Lewisham. Comments on relevant parts of the draft plan of specific interest to the Council are provided below.

Housing matters

It is noted that draft policy HO1 aims to exceed the London Plan minimum ten-year target of 16,670 net housing completions over the period 2019/20 to 2028/29, with no stated intention to seek that other boroughs accommodate any unmet housing need.

The Council welcomes the fact that a new site allocation policy relating to gypsy and traveller accommodation has been included as part of the draft plan, which seeks to meet the current identified need in full.

Employment land matters

The Council welcomes the requirements set out within draft policy EC2 that seek to ensure the economic function of Lewisham's Strategic Industrial Locations is safeguarded for industrial uses and will not be compromised by new residential or other non-industrial development.

Waste matters

The Council welcomes that draft policy SD12 sets out Lewisham's intention to continue to work with other local authorities within the South East London Joint Waste Planning Group including Bexley. Lewisham should consider, and if appropriate, add the term 'SELJWPG' to its list of abbreviations in Table 20.1.

Kind regards
Clare Loops



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Sent by email to: localplan@lewisham.gov.uk

Dear Sir/Madam

Local Plan Regulation 19 Consultation

Thank you for the opportunity to comment on the Lewisham Local Plan Regulation 19 consultation. As set out in our comments on the Regulation 18 draft Lewisham Local Plan, we consider that this is a comprehensive policy document which has been underpinned by careful consideration and evidence, and we support the broad objectives of the plan. We note that there have been several amendments to the document which address (in full or in part) comments made on this previous draft.

We have provided specific comments below, which relate back to comments made on the Regulation 18 draft document.

HO1 Meeting Lewisham's Housing Need

At Regulation 18 stage, we noted some concern that policy HO1 aimed to maximise housing delivery against the Local Housing Need figure. LBB objected to this approach as it is contrary to the London Plan, and we set out that Bromley would not be in a position to accommodate any of Lewisham's housing need.

Policy HO1 has been amended and now correctly refers to the London Plan targets. We support these amendments.

HO5 Accommodation for older people

At Regulation 18 stage, we noted that policy H5 (previously HO6) included clauses that were onerous including the need for specialist older person accommodation to be supported by community infrastructure (clause c) and to avoid an over concentration of care home accommodation (clause h). The Regulation 19 policy has addressed these concerns.

Policy QD4 Building Heights and Figure 5.1

We commented at Regulation 18 stage that Figure 5.1 of the draft Plan was confusing and there was no key accompanying it to explain what the different shades of green meant. We also set out that the policy should address impacts from proposed tall buildings on adjoining boroughs. There was also concern that some of the green shading in Figure 5.1 was crossing over into Bromley to the south of Lower Sydenham Station.

The Regulation 19 identifies three locations close to the Bromley boundary where tall buildings are considered to be suitable in principle (Grove Park, Sydenham and Lower Sydenham). Figure 5.1 has been amended and includes a key to explain the different shades of green (indicating areas considered suitable for tall buildings) which is supported.

There is still a small area of green shading at Lower Sydenham Station which straddles Lewisham and Bromley, as shown in the red outline on the image below. We would support a further change to remove this remaining green shading.



Paragraph 5.34 makes reference to the impact of proposed tall buildings on the building's immediate vicinity, surrounding area and elsewhere in London but this could be strengthened by making explicit reference to adjoining boroughs.

Policy TR2 Bakerloo line extension

At Regulation 18 stage, we commented that policy TR2 could be strengthened by including an explicit reference in the supporting text noting that the policy has no relevance where the buffer crosses the Borough boundary. The Regulation 19 draft, Paragraph 12.12 of the supporting text has been expanded to include:

“Where the 400 metres zone extends into neighbouring Boroughs the relevant Local Planning Authority should be consulted on relevant policy requirements.”

This amendment is welcomed and addresses our previous comment.

Policy CI1 Safeguarding and securing community infrastructure

At Regulation 18 stage, we set out that Policy CI1 stated that the Council will work collaboratively with stakeholders to identify current and projected future requirements for community infrastructure, and to secure the necessary provision of this infrastructure. This was supported but we considered that it might be useful to cross-

reference specific large-scale development areas in particular, as these are likely to result in the need for increased provision, for example school provision.

The Regulation 19 policy CI1 does not appear to cross reference to specific large scale development areas but has been amended to make reference to proposals within site allocation policies securing identified need through the masterplan process. The policy also states that in other areas where need is identified in the IDP, applicants should set out how this will be addressed. This amendment is welcomed.

Policy SD4 Energy infrastructure

Policy SD4 refers to heat networks and requires major developments to connect and possibly extend existing or planned future heat networks on or in proximity to their site. At Regulation 18 stage, we suggested additional wording which refers to potential connection to networks in adjacent Boroughs. The Regulation 19 draft does not include any additional references, but on reflection we consider that Paragraph 11.17 does address the point raised previously.

Site allocations

Lewisham South Area – Allocation 6 (Worsley Bridge Road Locally Significant Industrial Site) sets out the potential for co-location of compatible commercial and residential uses. We do not have any in principle issues with this allocation, but we would welcome reference to the Lower Sydenham LSIS designation on the opposite side of the railway tracks within Bromley, particularly relating to the need for new residential or other sensitive uses to adhere to the agent-of-change principle and ensure that they do not impact on the ongoing functioning of this area. There is also designated MOL in close proximity to this site along Worsley Bridge Road, which could be a relevant consideration for any development, particularly in terms of building heights.

With regard to the other proposed site allocations, we have no specific comments but would welcome sites near the Borough boundary making explicit reference to this and the need to consider impacts on Bromley.

We look forward to engaging with you further in relation to cross-boundary strategic matters in the future, including the preparation of a statement of common ground where necessary.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'B. Johnson', followed by a long horizontal flourish.

Ben Johnson
Head of Planning Policy and Strategy
London Borough of Bromley



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Lewisham Council
Local Plan Review - Regulation 19 Consultation
Planning Service
Laurence House
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25 April 2023

BY EMAIL: localplan@lewisham.gov.uk.

Dear Sir / Madam

**LEWISHAM COUNCIL LOCAL PLAN REVIEW REGULATION 19 CONSULTATION APRIL 2023
REPRESENTATION ON BEHALF OF LEWISHAM AND GREENWICH NHS TRUST**

Thank you for the opportunity to make representations on the Lewisham Council ('LC') Local Plan. This submission is made by Iceni Projects ('Iceni') on behalf of Lewisham and Greenwich NHS Trust ('the Trust') in response to the Lewisham Council Local Plan Regulation 19 Consultation open from 1 March 2023 to 25 April 2023. These representations are the first to be made by the Trust on the new Local Plan.

As a key stakeholder within the borough and a driver of Lewisham's health services, the Trust is keen to contribute to the Local Plan Review, as the growth and development of the borough over the next twenty years will be strongly tied to the improvement and betterment of the existing University Hospital Lewisham ('UHL') and the Trust's other community sites. Furthermore, it has been anticipated that this will be reciprocated through the acknowledgement, within policy, of the aspirations the Trust has for health infrastructure provision within the borough.

It is understood that this is the final consultation on the new Local Plan prior to submission to the Planning Inspectorate for Examination in Public and this consultation is part of LC's engagement strategy to give stakeholders the opportunity to make comments upon the soundness of the draft policies for publication.

Paragraph 35 of the National Planning Policy Framework (2021) ('NPPF') states that plans are 'sound' if they are:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

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

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Accordingly, this letter sets out the Trust's representations on the policies within the new Local Plan and provides responses on key issues pertinent to UHL and other Trust community sites, within the context of future aspirations to improve the existing UHL infrastructure and community sites and spatial requirements to expand. These representations follow meetings had with planning officers regarding the future delivery of a phased masterplan for the UHL site.

a. The Trust & Lewisham Council

The Trust was established on 1 October 2013 and is responsible for the UHL site, located on Lewisham High Street, SE13 6LH in addition to a range of other community health services in Lewisham and the Queen Elizabeth Hospital (QEH) in Woolwich, Royal Borough of Greenwich.

Historically UHL occupied the former site of seventeenth century almshouses and a workhouse (1817). Some of these workhouse buildings remain today on the site towards the southern end. The Grade II Listed Lewisham Public Library also falls in the demise of UHL site and is the only other surviving pre-twentieth-century buildings within the site. During World War 1, the workhouse transitioned from a pauper's hospital to being a military hospital. Following this in 1929 it became a municipal hospital. Since this period of time UHL has seen continuous development including the north of the site which includes a former maternity building of the 1930s and in more recent years change on the south west corner of the site towards the Ravensbourne River. The almshouses were replaced in the 1950s by a registry office. As recent as May 2022 planning permission has been granted for development on the UHL site.

Today UHL excels at offering a wide range of medical services as a district general hospital including accident and emergency through to cardiology, maternity, dermatology, intensive care, and general medicine, to name a few. The existing facilities for patients and visitors includes family accommodation and on call residential facilities for workers, car (including blue badge) and cycle parking, onsite pharmacy café and shop and accessibility measures for less abled people. The continuous development of the UHL site has resulted in an ad hoc collection of varied hospital buildings. Some of the building stock is ageing whilst other structures are obsolete and in need of re-purposing/ reconfiguration or assessed for building retention versus demolition/ redevelopment.

Lewisham is identified by the Greater London Authority as being in a designated Opportunity Area. As such Lewisham has seen significant development and growth over the years. As the population of Lewisham continues to expand (the new Local Plan forecasts that Lewisham's population is forecast to rise by some 42,400 people or 14 per cent by 2040), the Trust has turned its attention to the UHL site and other Trust community sites to ensure it is prepared to meet future needs and utilise the spatial capacity of UHL and other sites which is paramount to their success.

Over the next ten to fifteen years, the Trust seeks to redevelop, expand, and adapt, in collaboration with LC, the existing UHL campus (and other community sites) to cater for the new healthcare demands arising from population growth and changing demographics. The Trust is seeking to continue to provide a modern fit for purpose hospital campus which intensifies and makes more efficient use of the site as a whole, increases legibility and wayfinding (within and outside of the site) and is designed to be flexible and adaptable to meet evolving models of health and care delivery. In addition, the Trust would like to lower the existing UHL site's carbon emissions and provide a design that delivers on user

experience for patients, visitors, and workers, to meet local need and attract in new professional talent to work in the Borough. In order to achieve these aims, a new and enhanced UHL campus would need to be facilitated by a phaseable and deliverable masterplan for the UHL site which can be delivered incrementally and offers flexibility to respond to the evolving needs of healthcare and the community.

As a large anchor institution, whose long term sustainability is directly related to wider borough initiatives and the wellbeing of the population, the Trust seeks a better connected and welcoming frontage to Lewisham High Street and the surrounding communities, and seeks to improve the commercial offer on café, convenience retail and pharmaceutical uses. The Trust also wishes to ensure that there is provision of usable and accessible external public spaces for the use and enjoyment of patients, Trust staff and members of the public alike. UHL has already been successful in accommodating the first 'Wellbeing Garden' in London for staff, patients, and the local community in response to the Covid-19 pandemic, delivered in partnership between the NHS and Royal Horticultural Society. There is an opportunity to build on this provision through additional green spaces which might include multi-function green spaces for children's play, therapeutic gardens, fitness, recovery and general enjoyment by staff, patients, and visitors, linking with the green nature of the site's location nearby Ladywell Fields and opening access to the Ravensbourne River.

LC was one of the first boroughs in London to declare a "climate emergency" in 2019 and have produced their Lewisham Climate Emergency Strategic Action Plan 2020-2030 with an ambition for the borough to be carbon neutral by 2030. The NHS is also seeking a greener approach and is aiming to be the world's first net zero national health service with a target of being net zero by 2040 for emissions which are directly controlled and a target of being net zero by 2045 for those emissions the NHS can influence. Against this climate emergency backdrop, accordingly the Trust has aspirations to decarbonise the existing UHL estate, through developing a site wide energy strategy, reduce reliance on gas and encourage energy efficiency and sustainability to achieve its Net Zero targets.

The Trust is well placed to take hold of an excellent opportunity to develop a comprehensive masterplan approach in partnership with LC to enable the flexibility required to allow for UHL to adapt and develop as circumstances change.

This letter sets out the Trust's thoughts in respect of relevant draft policies published within the new Local Plan and the soundness of the Council's approach to the strategic issue of health in the borough with specific reference to the UHL site and other Trust community sites.

a. Lewisham Today and Planning Ahead

This section of the new Local Plan sets out the challenges and opportunities for the Local Plan to address. It notes in paragraph 2.3 to 2.4 that the population of Lewisham has grown by 23 percent over the last 20 years and is predicted to continue to grow till 2040. Currently 300,600 people live in Lewisham – an increase of 9% from 2011-2021. This increase is higher than the London average (7.7%).

The Plan correctly acknowledges the significant proportion of the younger population. It is worth noting that the proportion of young people in the borough is greater when compared with national averages, with more people aged between 25 and 44.

Paragraph 2.4 also notes that older people are the fastest growing demographic in London and the number and proportion of people aged 65 or more is expected to rise sharply over the next decades, including in Lewisham, according to the Centre for London. London: A place for older people to call home (2020) and Lewisham SHMAA (2022). In 2011-21 there was a 9.8% increase in people aged 65 years and older. The South East London Integrated Care System and NHS South East London have

noted that the complexity of health needs is increasing whilst those needing care and the number of people living with multiple health conditions is also increasing.

Page 33 of the new Local Plan provides an overview on deprivation and inequality in the borough noting health inequalities across the borough and discusses serious health issues such as obesity, citing that more than half of Lewisham's adult population is overweight or obese. Further to this, disparities in health and wellbeing inequalities in access to services of ethnic minority groups in Lewisham is also acknowledged. Evidence from the South East London Integrated Care System and NHS South East London, notes that almost half of Lewisham's population are from ethnic minority backgrounds and these communities require the appropriate support to address health conditions such as diabetes, hypertension and stroke and the higher prevalence rates of some mental health conditions, including psychotic disorder and Post-Traumatic Stress Disorder (PTSD).

London Plan Policy S1 'Developing London's social infrastructure' states that when preparing Development Plans, boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure.

In order to facilitate a growing population, and various other health challenges in the borough the UHL campus and other Trust community sites will have to adapt and expand. The Trust believes that health in the borough and provision of the required social infrastructure to support local needs should be an integral part of the new Local Plan and therefore offer support for a greater presence of this topic in this section, in order to be consistent with strategic policy and ensure the new Local Plan has been positively prepared.

b. Vision, Strategic Objectives, and the Spatial Strategy

Vision for Lewisham and Strategic Objectives

Table 3.2 sets out the Lewisham Local Plan Strategic objectives and the Trust is supportive of an objective for Lewisham residents to benefit from high quality health care by protecting and planning for facilities to meet local needs. The Trust also welcomes the recognition given to NHS as a key stakeholder for delivering health services in the Borough on line 22 of the table.

Draft Policy 0L1 'Delivering an Open Lewisham (spatial strategy)'

The Trust acknowledges the intent in the Draft Policy 0L1 of positive working relationships between the Council and other stakeholders to achieve the new Local Plan 'Vision' for Lewisham. The Trust agrees with the approach of directing new development to Opportunity Areas (part A) and the A21 Corridor (part D), optimising land through a design-led approach (part G) and requiring new development to integrate measures for climate change adaptation and mitigation (part I).

In part E of the draft policy there is an absence in the policy wording of any mention of securing infrastructure to support the needs of Lewisham's neighbourhoods and communities, although this is mentioned in the supporting policy text at paragraph 3.18.

The draft policy wording states '*securing the delivery of new and improved infrastructure*' but seemingly from an angle of investment and unlocking development, related to transport infrastructure only, rather than also making reference to the need for social infrastructure.

The London Plan has specific policies regarding the protection and enhancement of social infrastructure. London Plan Policy S1 'Developing London's social infrastructure' states that development proposals which provide high quality, inclusive social infrastructure, that addresses a local or strategic need and supports service delivery strategies should be supported, particularly when

easily accessible by public transport, cycling and walking and should be encouraged in high streets. London Plan Policy S2 'Health and social care facilities' states that boroughs should work with NHS organisations to identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location, or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.

The policy could be strengthened to align with these policies and the 'social objective' of the NPPF's three pillars of sustainable development which should be delivered through the preparation and implementation of plans. We suggest that the wording is amended to read as follows to ensure the new Local Plan is positively prepared and consistent with national and strategic policy:

*e. Securing the delivery of **high quality** new and improved infrastructure, **including social infrastructure**, as a catalyst for investment, ~~and~~ to unlock the development potential of sites across the Borough **and meet existing and future Borough identified need to support London's diverse communities**. The delivery of the Bakerloo line extension [...].*

It is worth noting that 'community infrastructure' is not a terminology used in the London Plan, therefore, to remain consistent with the London Plan the above amendment includes the suggested wording 'social infrastructure.'

c. Lewisham Central Area

Vision and Key Spatial Objectives

UHL is located within Lewisham's Central Area as identified in the new Local Plan. The vision for this area is for Lewisham (along with Catford) to evolve as a vibrant hub comprising a mix of uses and the new Local Plan highlights the importance of reimagining the A21 corridor and focusing new development along this key transport route. There is currently no mention of the importance of improvement to health and hospital facilities in the Lewisham Central Area which the Trust believes is crucial to support a growing population and to fully enable the area to evolve in a positive community focused way. There is a great opportunity for the UHL site to be recognised as a key enabler of the revisioning of the A21 Corridor.

The Regulation 19 Infrastructure Delivery Plan September 2022 clearly sets out the priorities for health infrastructure which includes proposals of decarbonisation of the existing UHL site and various refurbishment, and reconfiguration projects associated with Lewisham Hospital. The document notes an indicative development delivery timescale of up to 2030 which falls within the plan period for the new Local Plan.

As the UHL hospital infrastructure is of strategic borough importance, it is considered that to ensure the new Local Plan is effective, justified and a positively prepared, in regard to meeting its area based Vision for the Lewisham Central Area, reference should be made to aspirations for the UHL site in the key spatial objectives table on page 443. We suggest the text addition is worded as follows:

Improved health across the borough through supporting the longevity of the existing University Hospital Lewisham estate through a phased masterplan approach and site wide decarbonisation strategy. Facilitate connectivity to the surrounds including the Ravensbourne River, public realm along Lewisham High Street and nearby open spaces.

Draft Policy LCA4 'A21 corridor'

Part A of the Draft Policy LAC4 states that development proposals along the A21 corridor must demonstrate how they have responded positively to the A21 Development Framework (March 2022)

document through a design-led approach. The Trust acknowledges the Framework and in particular the strategy in section 2.3 of this document.

d. Community Infrastructure

Draft Policy CI1 'Safeguarding and securing community infrastructure'

The Trust is supportive of the approach of Draft Policy CI1 which references the Infrastructure Delivery Plan along with the relevant corporate plans and strategies of the Council and other key stakeholders as being considered in the decision making process for applications for major development proposals. The Trust acknowledges that it is vital for social infrastructure to be safeguarded and enhanced to support the needs of the borough.

It is considered that the new Local Plan should show how the policies will help to ensure that the social, objectives of sustainability will be achieved. The existing Core Strategy CS Policy 20 (Delivering Educational Achievements, Healthcare Provision and Promoting Healthy Lifestyles) sets out that the Council will support the implementation of the NHS Lewisham Commissioning Strategy Plan and improved health across the Borough by supporting the Lewisham University Hospital, health centres and GP surgeries. It is requested to support a justified new Local Plan that the supporting policy text makes reference to supporting the Lewisham University Hospital in the aims of LC for infrastructure delivery.

A further amendment is suggested in part A of the policy '*Local needs for community infrastructure [..]*' is amended to read '*current and future local needs for ~~community~~ social infrastructure [..]*'.

There is an interchangeable use of social infrastructure and community infrastructure in paragraph 9.1 of the supporting text. As already noted earlier in this letter, the London Plan refers to 'social infrastructure' rather than 'community infrastructure'. For consistency with London Plan Policy, we recommend that this is amended throughout the new Local Plan to avoid confusion.

Draft Policy CI2 'High quality community infrastructure'

It is noted that part A (c) of the Draft Policy CI2 states that '*Development proposals for new community infrastructure (including the alteration, extension, or reconfiguration of existing community infrastructure), will be supported where the facility [...] c. Is designed to maximise the flexibility and adaptability of space to accommodate a range of community uses.*

The supporting text at paragraph 9.1 defines community infrastructure as health services, education and training, community facilities (including public houses), places of faith, and sport and recreation facilities for people of all ages and abilities. The Trust recognises there is real scope to continue to integrate healthcare services with other suitable uses to generate activity around the UHL campus, and other community sites, which can create a welcoming environment and reduce stigma.

e. Meeting Lewisham's Housing Needs

Draft Policy HO1 'Meeting Lewisham's housing needs'

The Trust is supportive of the Council's approach to work positively and proactively with stakeholders, including development industry partners, to facilitate delivery of new homes to help meet Lewisham's housing needs. In particular the Trust supports the delivery of a much higher quality of housing design (for both proposed and existing housing) which can both help prevent ill health in the community and help with the recruitment and retention of public service workers, including those crucial to the operation of emergency services and the health system. The Trust would welcome acknowledgement

of this need within the policy or supporting text which is vital to enable delivery of sustainable development. Sustainable Design and Infrastructure

f. Sustainable Design and Infrastructure

Draft Policy SD2 'Sustainable design and retrofitting'

The Trust is committed to decarbonising the existing UHL site in order to meet their net zero targets. It is acknowledged that part C of draft Policy SD2 requires BREEAM 'Excellent' unless it cannot be demonstrated that this is not feasible.

The Trust wishes to be as sustainable as possible but also to maintain development viability. BREEAM can increase build costs and whilst the supporting policy text at paragraph 11.6 suggests some level of flexibility [*'All proposals will be considered having regard to individual site circumstances and the nature of development proposed.'*] the Trust would support the addition of 'or economically viable' to part F of the policy to strengthen it and ensure deliverability of the new Local Plan's objectives.

Draft Policy SD6 'Improving air quality'

The Trust recognises the importance of improved air quality in seeking to better public health in Lewisham. As such the Trust is supportive of the new Local Plan policy which advocates for minimising the population's exposure to poor air quality and which requires development proposals to seek to improve air quality and be as a minimum air quality neutral and not lead to further air quality deterioration.

g. Building Heights

Draft Policy QD4 'Building heights'

Draft Policy QD4 'Building heights' part A states that tall buildings (defined as 10 storeys or 32.8 meters, measured from the ground level to the top of the building (including roof top equipment), will be assessed against London Plan Policy D9 'Tall buildings.' Part B of Draft Policy QD4 goes on to say that tall buildings should only be developed in locations identified as appropriate for tall buildings on the Proposed Policies Map and that development proposals for tall buildings outside of these zones will be resisted. Part D of the draft policy similarly says that tall buildings will only be permitted where they are in a designated 'Tall Building Suitability Zone'.

The Proposed Policies Map January 2023, also subject to the Lewisham Local Plan Regulation 19 Consultation, does not include the UHL site within the 'appropriate location for tall buildings' designation. Therefore, any tall buildings in this location would be in conflict with Draft Policy QD4. There would also be a conflict with London Plan Policy D9 because it stipulates that locations for tall buildings and appropriate tall building heights should be identified on maps in the Development Plan.

Draft Policy LCA4 'A21 Corridor', requires development proposals along the A21 to demonstrate how they have responded positively to the A21 Development Framework. On page 22 and 43 of this document, which is a material consideration in decision making, it states suggested building heights for new development in the Character Area Framework: University Hospital Lewisham, Park, and Greens (where the UHL site is located) of 9-30 metres or 3-10 storeys. The A21 Development Framework by way of Draft Policy LCA4 is supportive of a ten storey building in this area (classed as tall by the new Local Plan) but Draft Policy QD4 and by extension London Plan Policy D9 is not.

Whilst it is noted that paragraph 1.9 of the A21 Development Framework states the University Hospital Lewisham is excluded from the scope of the study and height maps on pages 90 and 92 of the new

Local Plan, show the UHL site to be in a location which is more sensitive to height and outside of the 'appropriate locations for tall buildings' boundary, clarification from LC would be welcomed so that the UHL masterplan can respond accordingly to the Development Plan. This clarification will also ensure the new Local Plan is effective, justified and positively prepared in accordance with the strategy that has been developed for the A21 corridor to meet objectively assessed requirements to support the growth of Lewisham.

We note reference is made to both 'Appropriate locations for tall buildings' and 'Tall Building Suitability Zones'. We suggest an amendment to the terminology to ensure consistency and clarity.

The Trust is supportive of Part F of Draft Policy QD4 which says that tall buildings must be delivered through a masterplan process in order to ensure that they are appropriately located.

h. Masterplans and comprehensive redevelopment

Draft Policy DM3 'Masterplans and comprehensive development'

Although the UHL site is not subject to a site allocation in the new Local Plan, the Trust acknowledges Draft Policy DM3 'Masterplans and comprehensive development' as a way to secure the Local Plan's vision and strategic objectives and as previously noted, the Trust is seeking to prepare a masterplan for the UHL site which it hopes to develop in a collaborative manner with LC, the local community, and other relevant stakeholders.

i. Sustainable Transport

Draft Policy TR1 'Sustainable transport and movement'

Accessibility to the Trust's hospitals and healthcare community sites for both staff and patients is a key issue for the Trust. The Trust advocates for sustainable infrastructure to support increased accessibility for cycling, walking, and e-charging of electric cars.

Therefore, the Trust is supportive of Draft Policy TR1 'Sustainable transport and movement' which seeks for development to take into account connectivity and access to existing and planned future public transport. Positively, the policy goes on to say that the Council will work in partnership with stakeholders to secure improvements to the public transport network to help tackle local deprivation and ensuring equality of access to opportunities which the Trust is highly supportive of. We suggest Part D of the policy includes the mention of access to healthcare as well as just opportunities.

Draft Policy TR3 'Healthy streets as part of healthy neighbourhoods'

Draft Policy TR3 'Healthy streets as part of healthy neighbourhoods' requires development proposals to demonstrate how they have applied the London Plan Healthy Streets Approach and Indicators through a design-led approach. The policy also advocates for safeguarding and enhancing the Borough's walking and cycling routes plus highlights the importance of high-quality public realm in delivering the Healthy Streets Approach. These policies are important to encourage increased take up of public transport use and a move away from car usage which in turn will help improve borough air quality, which also has implications for poor health. The Trust encourages this policy approach.

j. Conclusions

We trust that the above representations will be considered as part of the Regulation 19 Consultation on the draft Local Plan. The Trust seeks proactive engagement with LC, given the Trust's role as a key stakeholder within the Borough, and commitment to providing an improved healthcare service for

now and generations to come. We would welcome the opportunity to discuss these representations and the Trust's aspirations further with you.

Should you wish to discuss any aspect of this representation, in the first instance please do not hesitate to contact John Mumby on jmumby@iceniprojects.com or 07887 294 390 or Helen Allan on hallan@iceniprojects.com or 07795 447 976.

Yours faithfully,

Iceni Projects Ltd.

cc. Matt Collyer – Lewisham and Greenwich NHS Trust, Redevelopment Programme Manager,
matt.collyer@nhs.net

Jessica Haines – Lewisham and Greenwich NHS Trust, Director of Development

Lewisham Local Plan – Proposed Submission document Regulation 19 draft Consultation Questions

This form has two parts

Part A – Personal details to be completed once

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A - Personal Details

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First Name	<input type="text" value="Vincent"/>	Line 2	<input type="text" value="55 Baker Street"/>
Last Name	<input type="text" value="Gabbe"/>	Line 3	<input type="text" value="London"/>
Job Title	<input type="text"/>	Line 4	<input type="text"/>
Organisation	<input type="text" value="Knight Frank on behalf of Metropolitan Police Service"/>	Post code	<input type="text" value="W1U 8AN"/>
Telephone number	<input type="text" value="(07799) 708148"/>	E-mail Address	<input type="text" value="vincent.gabbe@knightfrank.com"/>

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- | | | | | | |
|---|---|-----|----|-------------------------------------|-------------------------------------|
| <p>1. To which chapter of the Lewisham Local Plan – Proposed Submission document does your representation relate?</p> | <p>Chapter name
Monitoring</p> | | | | |
| <p>2. To which part of the chosen chapter does you representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)</p> | <p>Policy name/number
Policy DM2: Infrastructure funding and planning obligations</p> | | | | |
| <p>3. Do you consider that this part of the chapter is legally compliant?</p> | <table border="0"> <tr> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> | Yes | No | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Yes | No | | | | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | | | | |
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*If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments.
Continue answer on separate sheet if necessary.*

Policy DM2 (Infrastructure funding and planning obligations) refers to community and social infrastructure and also community safety measures as being areas where section 106 contributions will be sought from developments. However, it does not explicitly refer to seeking contributions from major development to mitigate the impact of crime and the need that arises for additional policing infrastructure.

Background

The draft Local Plan refers to the population of Lewisham’s population growing by roughly 20% by 2040. It also refers to the London Plan target of delivering 1,667 net units a year. There will also be a corresponding growth in commercial activity and development. This is a significant amount of development that will have knock on implications for crime rates and policing infrastructure. Continued on next sheet...

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Continue answer on separate sheet if necessary.

Add more explicit reference to the need for policing related section 106 contributions to Policy DM2, or the supporting text.

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes

No

(I do wish to participate in an examination hearing session) (I do not wish to participate in an examination hearing session)

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. Continue answer on separate sheet if necessary.

Question 6 Continued:

Policy Recognition Sought

MPS is seeking recognition within the proposed Local Plan that new dwellings and other development increases the need for policing, leading to a legitimate infrastructure requirement that should be accounted for through section 106 contributions. We believe that it is appropriate that this should be set out clearly within the Local Plan, as opposed to any other documents. This is because this document establishes the need for and strategy to deliver new dwellings and other growth that gives rise to the requirement.

Relevant Appeal and Court Cases

It is widely accepted and documented that policing infrastructure represents a legitimate item for inclusion within a Section 106 agreement. A number of policing authorities have sought legal advice on this issue and received confirmation of this. The advice also confirms that S106 infrastructure is not limited to buildings and could include equipment such as surveillance infrastructure and CCTV, staff set up costs, vehicles, mobile IT and the Police National Database. A breakdown of non-building related infrastructure sought by MPS is detailed below.

For example, in the case of *The Queen (on the application of The Police and Crime Commissioner for Leicestershire) v Blaby District Council* [2014] EWHC 1719 (Admin), Judge Foskett stated:

61... "I do not, with respect, agree that the challenge mounted by the Claimant in this case can be characterised as a quibble about a minor factor. Those who, in due course, purchase properties on this development, who bring up children there and who wish to go about their daily life in a safe environment, will want to know that the police service can operate efficiently and effectively in the area. That would plainly be the "consumer view" of the issue. The providers of the service (namely, the Claimant) have statutory responsibilities to carry out and, as the witness statement of the Chief Constable makes clear, that in itself can be a difficult objective to achieve in these financially difficult times. Although the sums at stake for the police contributions will be small in comparison to the huge sums that will be required to complete the development, the sums are large from the point of view of the police.

62. I am inclined to the view that if a survey of local opinion was taken, concerns would be expressed if it were thought that the developers were not going to provide the police with a sufficient contribution to its funding requirements to meet the demands of policing the new area."

The above conclusions echo those reached in an earlier appeal case of *Land off Melton Road, Barrow-upon-Soar* (APP/X2410/A/12/2173673), in which the Secretary of State endorsed the following findings of the Inspector:

291... "the twelfth core planning principle of the Framework... can only be served if policing is adequate to the additional burdens imposed on it in the same way as any other local public service. The logic of this is inescapable. Section 8 of the Framework concerns the promotion of healthy communities and planning decisions, according to paragraph 69, should aim to achieve places which promote, inter alia, "safe and accessible environments where crime and disorder and the fear of crime do not undermine quality of life or community cohesion.

There are other more recent appeal and court precedents with the most recent being in 2021. Full details of these can be made available upon request.

Nature of Contributions Sought

MPS have prepared a charging formula, based on the approach used by other Police and Crime Commissioners and tested through the above appeals and court cases. This seeks contributions towards the following categories of policing infrastructure in connection with new major developments (generally only those referable to the Mayor for London).

- Staff set up costs
 - Uniforms.

- Radios.
- Workstation/Office equipment.
- Training.
- Vehicles
 - Patrol vehicles.
 - Police community support officers (PCSO) vehicles.
 - Bicycles.
- Mobile IT: The provision of mobile IT capacity to enable officers to undertake tasks whilst out of the office in order to maintain a visible presence.
- CCTV technologies: Automatic Number Plate Recognition (ANPR) cameras to detect crime related vehicle movements.
- Police National Database (PND): Telephony, licenses, IT, monitoring and the expansion of capacity to cater for additional calls.
- The provision of police office accommodation.

Section 106 Contributions and Policing Summary

MPS is working hard to achieve cost savings and find new and alternative sources of capital and revenue funding to support policing in London. Section 106 charges to support policing at Borough level are necessary and appropriate. As such, we ask that this be acknowledged within the Local Plan and / or Infrastructure Delivery Plan.

Lewisham Local Plan – Proposed Submission document Regulation 19 draft Consultation Questions

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 <input type="text" value="Housing"/></p> | | | | |
| <p>2. To which part of the chosen chapter does you representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)</p> | <p>Policy name/number
 <input type="text" value="Site Allocation: 4 Havelock House, Telecom Site and Willow Tree House, near Horniman"/></p> | | | | |
| <p>3. Do you consider that this part of the chapter is legally compliant?</p> | <table border="0"> <tr> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td style="text-align: center;"><input checked="checked" type="checkbox" value="x"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> | Yes | No | <input checked="checked" type="checkbox" value="x"/> | <input type="checkbox"/> |
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We consider that the deletion of Site Allocation: 4 Havelock House, Telecom Site and Willow Tree House means that the draft plan is not positively prepared or justified. We understand from the Council’s summary of Regulation 18 representations and responses that the proposed allocation was deleted because of a single representation, objecting to the proposed allocation. This raised concerns about a potential loss of trees, impact on wildlife and also the need for further consultation.

It was also suggested that the allocation was at odds with objective 9, which seeks to 'Promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets'.

Continued on next sheet...

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

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Re-instate the proposed site allocation for Site Allocation: 4 Havelock House, Telecom Site and Willow Tree House. If necessary, the site allocation can be adjusted to acknowledge the need to consider trees, wildlife and consultation.

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes

No

(I do wish to participate in an examination hearing session) (I do not wish to participate in an examination hearing session)

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. *Continue answer on separate sheet if necessary.*

Question 6 Continued:

The Council's response confirms that the allocation will be deleted, but notes that the site is over 1.5 hectares and therefore warrants inclusion as a strategic site. The Council also refers to the expectation that a planning application may be received and would be considered against other policies in the plan.

We do not believe that the issues raised in the objection impact on the principle of development for this site. If there are concerns about trees, wildlife, or the need for consultation these should be addressed in the wording of the proposed allocation or adjusting the potential dwelling yield of the site.

We also note that the National Planning Policy Framework encourages Local Authorities to have regard for the need to make effective use of land. In this regard, paragraph 121 of the NPPF states that "Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them." The subject site involves public land, where the Council has already identified that development proposals are likely to come forwards. The NPPF seeks a proactive approach to the delivery of such land. If the plan remains silent, this appears to run counter to the content of the NPPF.

Our Ref: MV/ 15B901605

25 April 2023

Lewisham Council
LocalPlan@Lewisham.gov.uk
via email onlyDear Sir / Madam
**Lewisham Local Plan - Regulation 19 Consultation
March - April 2023
Representations on behalf of National Grid**

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets:

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.

Development Plan Document Site Reference	Asset Description
Lewisham's North Area - Site Allocation 5 - Surrey Canal Road and Trundleys Road Locally Significant Industrial Site	0Kv Underground Cable route: LPT2 Planned
Lewisham's North Area - Site Allocation 11 - Former	275Kv Underground Cable route: HURST - NEW CROSS 1

Hatcham Works, New Cross
Road

Lewisham's North Area -
Site Allocation 14 - Former
Deptford Green School

0Kv Underground Cable route: Deptford BR

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect NGET's assets. We would be grateful if you could check that our details as shown below are included on your consultation database:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Ellie Laycock, Development Liaison Officer

box.landandacquisitions@nationalgrid.com

National Grid Electricity Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



Matt Verlander MRTPI

Director

0191 269 0094

matt.verlander@avisonyoung.com

For and on behalf of Avison Young

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be

exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's *'Guidelines for Development near pylons and high voltage overhead power lines'* promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

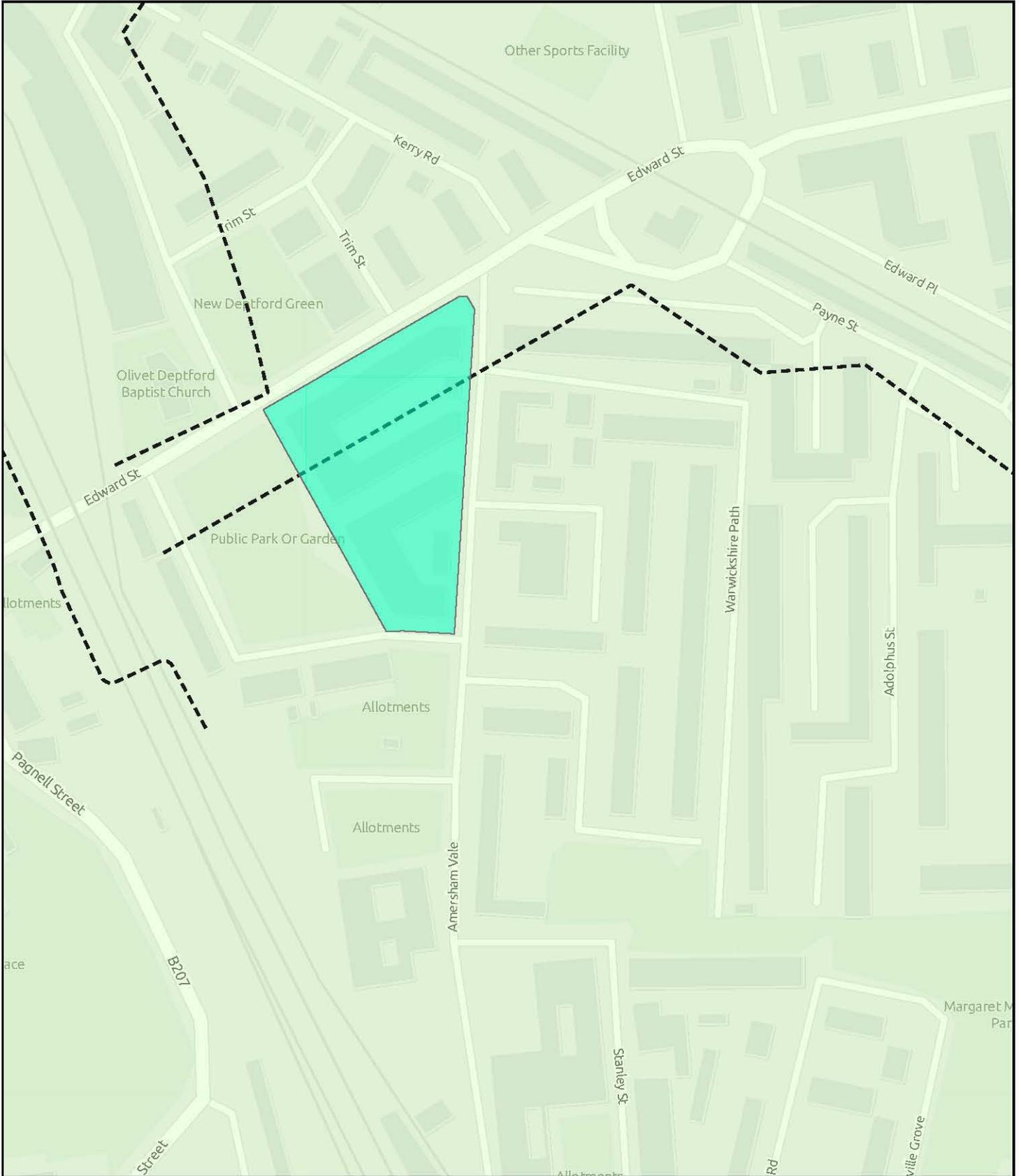
NGET's statutory safety clearances are detailed in their *'Guidelines when working near National Grid Electricity Transmission assets'*, which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

Site 14 Former Deptford Green School (Upper School Site)



25/04/2023, 16:36:28

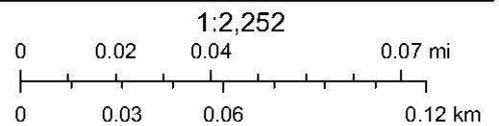
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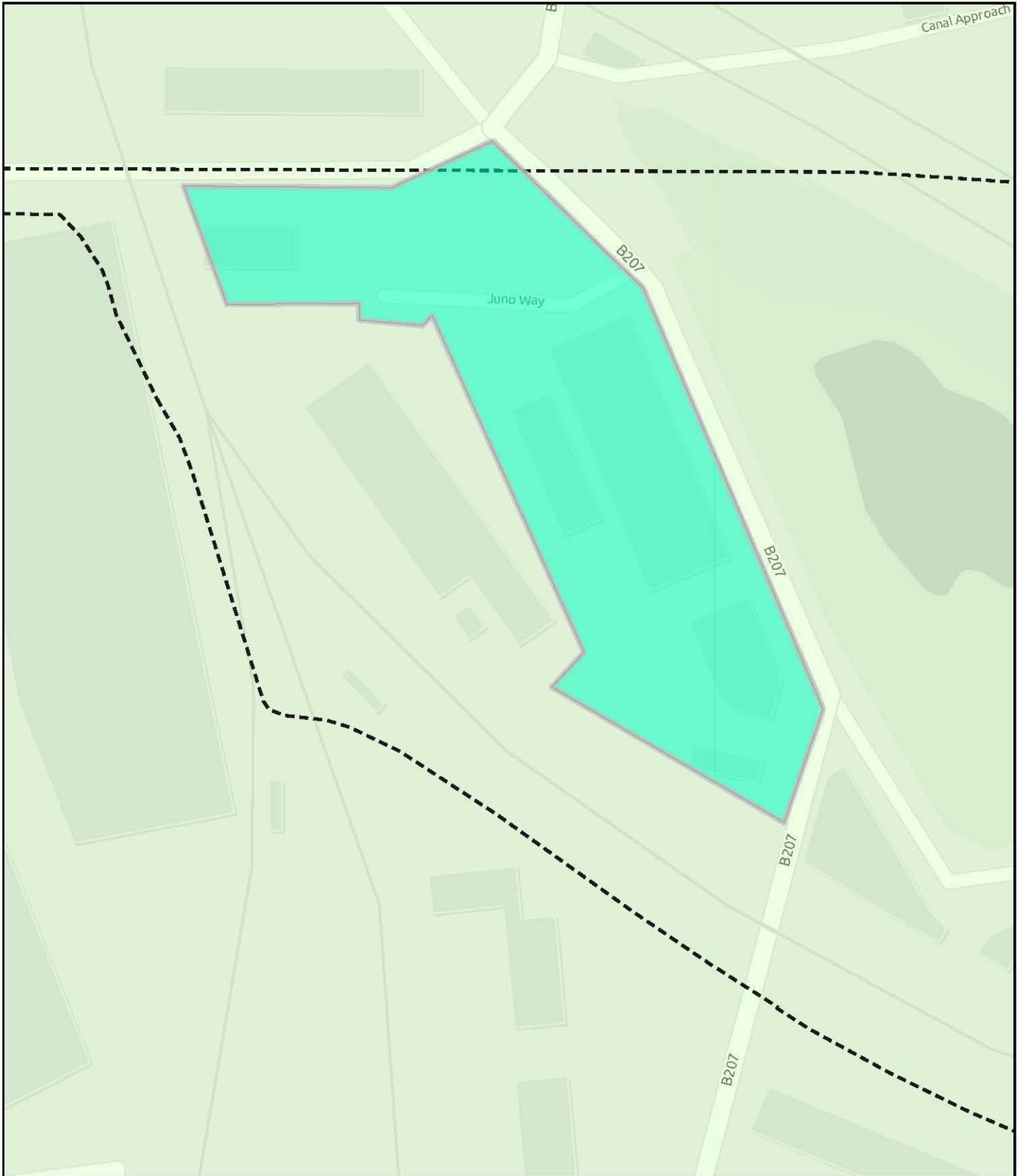
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Site 5 Surrey Canal Road and Trundleys Road



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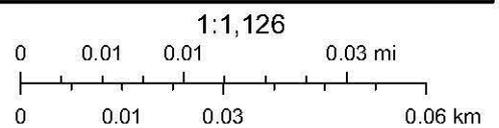
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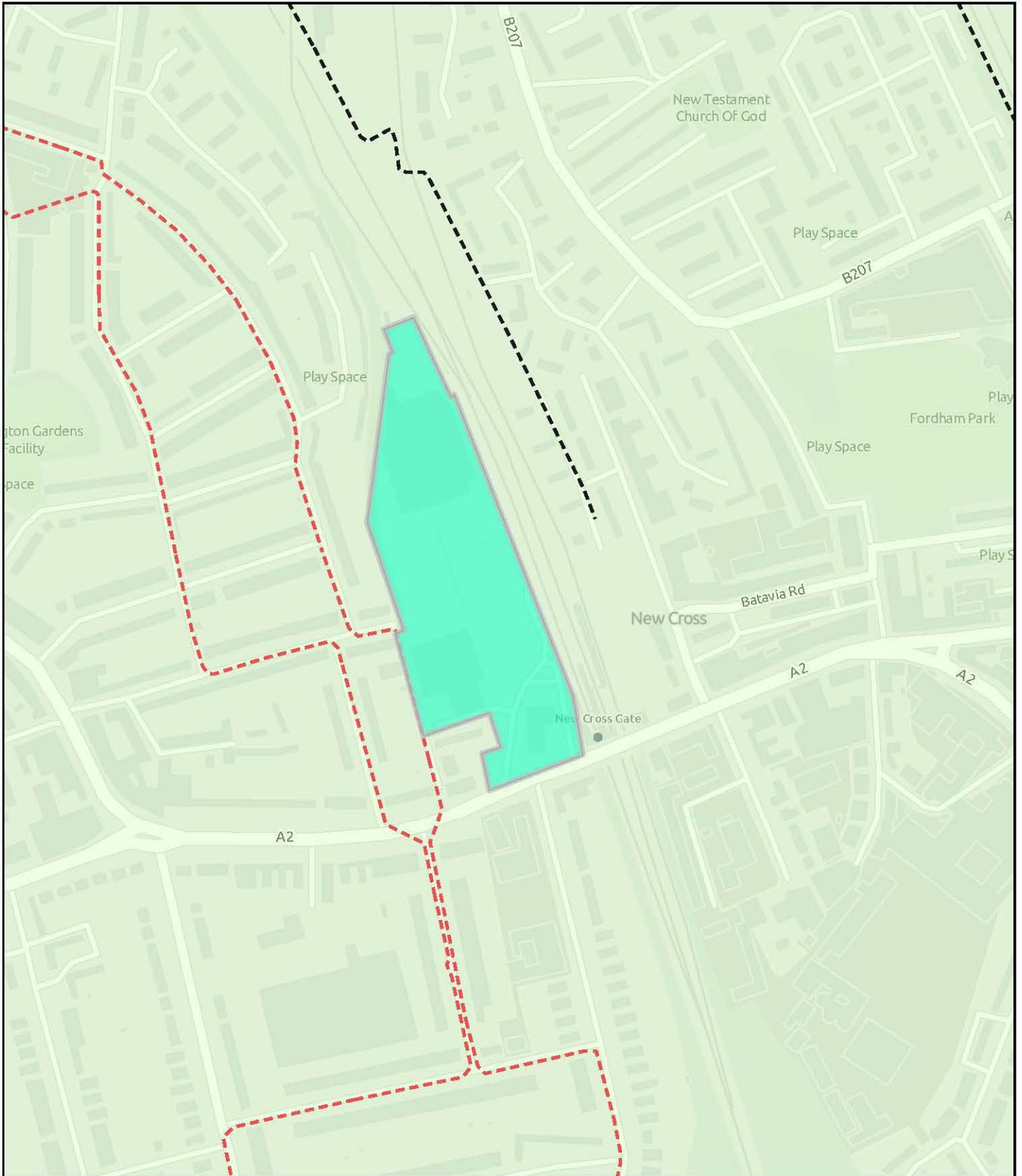
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Site 11 Former Hatcham Works, New Cross Road



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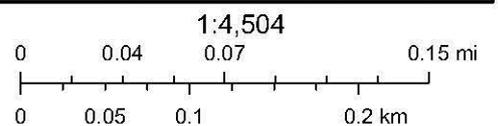
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Contains data from OS Zoomstack

Date: 13 March 2023
Our ref: 423521
Your ref: Statement of Representation – Local Plan



Mr Christopher Frazer
Planning Service
Lewisham London Borough Council
Laurence House
1 Catford Road
London,
SE6 4RU

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY - planning.policy@lewisham.gov.uk
Christopher.Frazer@lewisham.gov.uk

Dear Mr Frazer

Planning Consultation: Statement of Representation – Lewisham Local Plan

Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 1st March, 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have no comments to make on this consultation.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

Yours sincerely

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England

By email only: localplan@lewisham.gov.uk



Strategic Planning Team
Laurence House
1 Catford Road
London
SE6 4RU

Town Planning Southern
Network Rail
1 Puddle Dock
London
EC4V 3DS

24/03/2023

Dear Planning,

**NETWORK RAIL CONSULTATION RESPONSE: LEWISHAM LOCAL PLAN (2020 – 2040)
CONSULTATION (REGULATION 19)**

Thank you for consulting Network Rail on the above consultation. Having consulted internally, we have the following comments.

Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, Network Rail is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway.

The railway is bound to feel the impact of the Council's regeneration plans for Lewisham. While we do not object to development in principle, as part of Network Rail's license to operate and manage Britain's railway infrastructure, we have an obligation to ensure rail travel continues to be promoted as an attractive form of sustainable transport. As a publicly funded company, Network Rail has responsibilities to spend public funds efficiently which consequently means we do not have the funds available to mitigate the impact of third-party development. Consequently, Network Rail expect any mitigation required to be funded at no expense to Network Rail.

Train Stations

Where a significant amount of rail trips are generated by a third-party development, Network Rail expect that the development provides a contribution to mitigate the additional usage, ensuring that the rail network can continue to operate effectively.

The contributions will encourage greater use of public transport by enhancing the rail experience for passengers. Please note that we are still in the process of engaging with the train operating companies, Southern Railway and Southeastern Railway, in relation to the current conditions of rail stations within the Council's boundary and the mitigation methods that would be required.

- **Bellingham station** - in the first instance, we have identified the requirement for step-free access in Bellingham Station – an issue that is likely to be exacerbated by the proposed redevelopment of the retail park on Bromley Road.

It is noted that provision for access improvements to the station approach of Bellingham has been included in policy **LSA1**, however this should be strengthened so that access-for-all improvements are vital.

Site Allocations

- **Worsley Bridge Road Locally Significant Industrial Site** – enhancements towards the station approach at Lower Sydenham and the delivery of a cycleway are supported. We will be able to provide further, more specific detail regarding the nature of enhancements in due course.
- **Surrey Canal Triangle Mixed-use Employment Location** – the proximity of this development location is a concern for South Bermondsey station. Upgrades towards accessibility should be ensured, including provision of access for all lifts. Other sites also interact with South Bermondsey, particularly so if Surrey Canal Road is delayed or delivered after the developments.

- **Former Hatcham Works, New Cross Road** – Network Rail are keen to work with Lewisham and TFL on aspirations for enhancing New Cross Gate station. We have previously suggested potential for oversight development.
- **Bell Green area** – land should be safeguarded to support the delivery of strategic infrastructure, including where required for the Bakerloo line extension. Network Rail have already received information requests regarding Bell Green and, alongside TFL, should be consulted on development going forward.

Strategic Transport Schemes

- **North of Lewisham** - Regarding the regeneration plans of the North of Lewisham, the Council should be aware that there are still no firm dates for the opening of Surrey Canal Road Station. This could lead to potential delays that part of the Borough, as well unexpected pressure on South Bermondsey station, which is a concern.
- **TR1 'Metroisation of London Overground services'** – is the Council referring to the metroisation of Southeastern services, rather than London Overground?

The Council should also consider there are fewer services running than before, the first steps to metroisation would therefore be restoration and subsequent increase of current frequencies, before looking to enhance in the short term.

- **TR2 Bakerloo Line Extension** – this features throughout the plan as a key enabler of high density development, which Network Rail supports as it releases significant capacity of the Southeastern and Thameslink network.

I trust that the above is clear, should you require additional information please do not hesitate to contact me.

Kind regards,



Sam Bhatti

Graduate Surveyor

Network Rail Property (Southern)

A: 1 Puddle Dock, London, EC4V 3DS

M: 07514 734709

E: sameem.bhatti@networkrail.co.uk

W: www.networkrail.co.uk/property



Local Plan
Lewisham Planning Policy
London Borough of Lewisham
localplan@lewisham.gov.uk

Transport for London
Spatial Planning

8th Floor
5 Endeavour Square
London E20 1JN

Phone 07891 986 623
tfl.gov.uk

25 April 2023

Consultation on the Lewisham local plan: proposed submission document (regulation 19)

Thank you for giving Transport for London (TfL) the opportunity to comment on the Lewisham regulation 19 draft local plan.

Please note that these comments represent the views of TfL officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority. A separate response has been prepared by TTL Properties Limited to reflect TfL's interests as a landowner and potential developer.

The London Plan was published in March 2021. Local plan policies and site allocations should be developed in general conformity with the London Plan policies and TfL's aims as set out in the Mayor's Transport Strategy. In particular, it is important that local plans support the Healthy Streets Approach (reducing car dependency and increasing active, efficient and sustainable travel), Vision Zero (the elimination of all deaths and serious injuries on London's transport system) and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

We are pleased to see that the Lewisham regulation 19 draft local plan builds on the previous version and takes on board much of our previous regulation

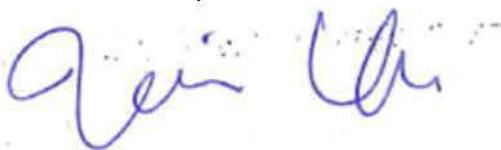
18 response to support these aims. We welcome the inclusion of Good Growth principles, as well as responding strongly to climate change and linking the proposed Bakerloo line extension (BLE) to supporting these goals. We appreciate the support for the BLE that is set out in the local plan and have provided comments to ensure consistency in the messaging regarding this project. There remain a couple areas that we would like to highlight to further strengthen the draft local plan and ensure internal consistency with the overarching Strategic Objectives and key policies.

We strongly support the Council's proposed approach to car parking which supports car-free development in locations which are well-connected and car-lite development in locations which are less well-connected. We also welcome that the local plan identifies growth in well-connected locations which will further support the wider ambition to reduce car use and enable modal shift in the borough. Some additional changes could be made to provide further clarity to the intended application of policy TR4. A number of policies refer to parking requirements. These references should be removed to be in line with the London Plan and to be internally consistent with policy TR4.

We welcome that the Council has incorporated many of our previous comments on the BLE. We previously strongly advised that the Council clearly articulate that the scenario with no BLE is not 'preferred' but is being considered to allow for the uncertainty of the BLE's delivery within the plan period. It is very much welcomed that this scenario has been removed and that a much stronger rhetoric around the benefits of the BLE has been included. We would suggest some additional changes to further refine how the Plan relates to the BLE.

We have set out a number of comments and proposed changes on the following pages which we hope are helpful. We look forward to continuing our work together in drafting the final document.

Yours faithfully



Josephine Vos
London Plan and Planning Obligations Manager
Email: josephinevos@tfl.gov.uk

Appendix A: Detailed comments and suggestions for amendments

Policy	Page	Comment/Amendment
General comments		'Public transport accessibility' should be replaced with 'public transport access' or 'access to public transport', throughout the local plan, for consistency with the London Plan. 'PTAL' as defined in the London Plan means 'public transport access level'.
Strategic Objectives	44–5	<p>We support the Strategic Objectives set out, and particularly welcome the amendment to Strategic Objective H2I to explicitly include the reduction of car use as part of the objective. We would additionally suggest that explicit reference is made to active travel alongside public transport: 'Work in partnership with central government, the Greater London Authority, Transport for London, Network Rail and other stakeholders to reduce car use, increase active travel, and increase public transport capacity and accessibility across the Borough, as well as to unlock the development potential of specific localities and strategic sites, including through the delivery of the Bakerloo Line Extension.'</p> <p>As set out in our regulation 18 consultation response, the Council should consider explicitly providing policy support for Low Traffic Neighbourhoods in Strategic Objective G17: 'Create an environment that encourages and enables people to pursue active and healthy lifestyles irrespective of their age, ability or income, including by applying the Healthy Streets Approach, creating Low Traffic Neighbourhoods, making provision for accessible leisure and recreation opportunities and protecting the amenity of residents and visitors, particularly from pollution.'</p>
OLI: Delivering an Open Lewisham	48–57	The amendments throughout Policy OLI result in a more positively worded, clear and concise policy. In particular, we welcome the direct reference to the Healthy

Policy	Page	Comment/Amendment
		<p>Streets Approach and proposals to improve connectivity between neighbourhoods by sustainable modes.</p> <p>While we welcome the explicit and repeated commitment to directing development to well-connected locations as well as Growth Nodes, Growth Corridors and Opportunity Areas, areas around stations are conspicuously absent. Areas within walking distance of rail stations have the potential to support a higher development capacity, even with a nominally low PTAL due to the relative connectivity provided by quick journey times to key interchanges, especially Lewisham and London Bridge stations. It is recommended OLIAa. is amended: 'Directing new development to Growth Nodes, Regeneration Nodes and well-connected sites, including in Lewisham's Opportunity Areas of New Cross/Lewisham/Catford and Deptford Creek/ Greenwich Riverside and around stations, and carefully managing growth in these locations in response to local character'.</p> <p>The BLE is mentioned throughout this section positively and the Council makes a commitment to work towards the delivery of the BLE in paragraph 3.21. We appreciate that the local plan references the challenges of funding the BLE and therefore has stated that the spatial strategy is not reliant on the delivery of the BLE. We recommend that the plan clearly articulates that whilst the spatial strategy is not reliant on the BLE, the BLE remains a key spatial objective.</p>
QD3: Public realm and connecting places	81-5	Part B: We strongly support the additions to Part B of the policy which refer to the need to apply the Healthy Streets Approach to enable walking, cycling and use of public transport, as well as reducing vehicular speed and dominance.

Policy	Page	Comment/Amendment
		5.23: Reference should additionally be made to TfL's Streetscape guidance ¹ : 'Development proposals are also encouraged to refer to the Government's Manual for Streets and Transport for London's Streetscape guidance.'
HO2: Optimising the use of small housing sites	163–8	As requested in our regulation 18 consultation response, references to parking stress and requirements have been removed, which is welcomed. We now consider this policy to be in line with the London Plan.
HO5: Accommodation for older people	185	<p>Part Be.iii. should refer to policy TR4 (Parking), to clarify that parking considered for accommodation for older people should not be above the maximums in TR4: 'Access, parking and servicing arrangements, including for all types of vehicles expected to access the development, <u>in accordance with Policies TR4 (Parking) and TR5 (Deliveries, Servicing and Construction)</u>.'</p> <p>The last sentence of paragraph 7.52 should also be similarly amended, to clarify that parking rather than being 'adequate' should not be above the maximums in TR4 (Parking): 'Developments must also make adequate provision for access, parking and servicing for vehicles, with drop-off points for taxis, mini-buses and ambulances located near the building's principal entrance. <u>Parking should be within the maximums in Policy TR4 (Parking)</u>.'</p>
HO10: Gypsy and traveller accommodation	204	Part Bc. should be amended to clarify that any parking provision should rather than 'adequate' as currently in HO10 be assessed through and subject to the maximums in policy TR4 (Parking): 'Access, parking and servicing arrangements for all vehicles likely to use the site, including emergency services, <u>with any parking provided in accordance with TR4 (Parking)</u> '.

¹ content.tfl.gov.uk/streetscape-guidance-2022-revision-2.pdf

Policy	Page	Comment/Amendment
EC9: Railway arches	243–4	We welcome the inclusion of the need to consult with TfL in paragraph 8.52, but request the following re-wording to protect the BLE: 'Applicants will be expected to consult Network Rail and Transport for London on development and design options in order to ensure there is no adverse impact on the public highway and rail network, or impacts that may preclude, prejudice or delay the delivery of planned transport infrastructure, including the Bakerloo line extension.'
GR2: Open space	317–28	The policy wording would appear to be more flexible for allowing works on open spaces, subject to alternative provisions or improvements. However, the policy should be amended to make explicit that temporary works relating to the BLE, such as construction and enabling works, would be an acceptable form of development.
SD6: Improving air quality	369–72	<p>Policy SD6 is supported, and we welcome the added reference to the Healthy Streets Approach in the supporting text of the policy.</p> <p>As stated in our regulation 18 comments, given car use is one of the main contributors to NO_x, PM_{2.5} and PM₁₀ emissions, the impact of developments with car parking and the resulting increase in car use should be explicitly referred to as well. It is recommended the last two sentences of paragraph 11.33 are amended: 'The Healthy Streets Approach should be used wherever possible to help address poor air quality. <u>As car use is one of the main contributors to NO_x, PM_{2.5} and PM₁₀ emissions, where developments provide car parking, the resulting impact on car use should be considered.</u> Development proposals will be considered taking into account individual and cumulative impacts of development in an area, consistent with national policy.'</p>

Policy	Page	Comment/Amendment
TRI: Sustainable transport	403–7	<p data-bbox="848 276 2029 427">Policy TRI is supported. In particular, we welcome the changes in TRI which refer to ‘enabling’ mode shift and walking and cycling. We also welcome the addition to TRID of ‘d. Expansion of cycle hire’ in response to our comments in the regulation 18 consultation.</p> <p data-bbox="848 480 2029 592">Part C: We welcome the intention to safeguard sites for construction and delivery of the critical transport improvements and permanent infrastructure, to enable the borough to deliver its spatial objectives.</p> <p data-bbox="848 644 2040 1209">However, not addressed from our comments made on the regulation 18 local plan, part C refers to ‘safeguarding’. A distinction should be made between the ‘safeguarding’ as a matter of local plan policy, and the formal safeguarding directions made by the Secretary of State for Transport on 1 March 2021 in respect of the BLE. The latter must be complied with under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO 2015). In relation to the former, we acknowledge there can be a form of policy-based ‘safeguarding’ on a strategic basis via the London Plan and at a more detailed local level via this local plan, but we consider further specificity would be clearer. In particular, the current draft local plan is not sufficiently granular and should set out more clearly the reasons for the policy-based safeguarding and the implications thereof on a site-by-site basis. This should cover stations, work sites, the line and corridor and associated works (more detail of which TfL can provide upon request).</p> <p data-bbox="848 1262 1989 1332">Further to our regulation 18 request, that explanatory paragraph 12.10 is now included in the local plan is supported, including its details of the Secretary of</p>

Policy	Page	Comment/Amendment
		<p>State's safeguarding directions, that these have been included on the policies map, that the BLE will make a higher number of homes possible within the existing and potential Opportunity Areas, and that it will deliver a transport interchange at Lewisham along with the benefits of this.</p> <p>Throughout the local plan there is reference to both the 'Secretary of State' and 'Ministerial' safeguarding directions. A single reference should be used to provide clarity. 'Secretary of State' is preferable, in accordance with the wording of the directions and the DMPO 2015.</p> <p>Table 12.1 Indicative list of strategic transport schemes: The table does not define the timeframes associated with each project. In particular, for the BLE, 'medium' is both ambiguous and implies a shorter than anticipated delivery timescale. 'Metroisation' as described in the Mayor's Transport Strategy would apply to all National Rail services in south and southeast London, rather than to the London Overground, and the table should be amended to read: "'Metroisation" of London Overground National Rail services'. The table should additionally be amended to read: 'Surrey Canal Road-station'.</p> <p>We note the removal of 'New Cross to Lewisham Overground extension', however this still appears in the Infrastructure Delivery Plan. This scheme should be removed from the Infrastructure Delivery Plan for consistency with the local plan.</p> <p>Part D: We support the Council's commitment to improving the public transport network, including improving bus priority and bus stop infrastructure in Policy</p>

Policy	Page	Comment/Amendment
		TRID. TfL's Bus Action Plan ² was published in March 2022, and we would suggest the Council include reference to the Bus Action Plan in the explanatory text.
TR2: Bakerloo line extension	409	<p>This policy supports the BLE and this is welcomed.</p> <p>Part B: The following amendments are recommended, for clarity: 'Development proposals must demonstrate that they will facilitate and not preclude the delivery of the BLE, with reference to Policy TRI (Sustainable transport and movement). They Development proposals must take into account taking into account Ministerial safeguarding Directions the Secretary of State for Transport BLE safeguarding directions which were issued on 1 March 2021, the supporting safeguarding directions guidance, and relevant Mayor of London / Transport for London infrastructure requirements and/or feasibility studies associated with BLE <u>phases 1 and 2</u>, and should consult with relevant transport bodies at the an early stage of the planning process².'</p> <p>Part C: Our view is that only sites in the safeguarded zone (that is, the area to which the Secretary of State's safeguarding directions apply) should need to demonstrate how they address the infrastructure requirements of BLE such as running tunnels, noise and vibration. That this would be required by the policy for any development within 400 metres of a proposed station or safeguarded zone is unnecessary.</p> <p>Furthermore, requirements for transport assessments and transport statements are already set out in local plan policy TRIF (Assessing and mitigating transport impacts) and London Plan policy T4B (Assessing and mitigating transport</p>

² content.tfl.gov.uk/bus-action-plan.pdf

Policy	Page	Comment/Amendment
		<p>impacts), and we consider that these should be relied on for assessing sites near the BLE, rather than specifying through this policy any distance from stations that should be considered. For strategic developments, for example, the impact on the nearest stations should be assessed in a transport assessment and mitigated, regardless of whether they are any specified distance from a development site. We would welcome further discussion on this point in particular, as setting a threshold of 400 metres would be an unhelpful precedent and something we would object to strongly.</p> <p>As such, the text in part C should be amended to remove the reference to 400 metres, and subsequently the last two sentences of part C regarding potential public realm and transport infrastructure enhancements should be moved to part D of the policy because they should apply to beyond the safeguarded area, as follows:</p> <p style="padding-left: 40px;">C Development proposals on sites located within 400 metres of a proposed the Bakerloo line BLE station or safeguarded area, <u>under the Secretary of State for Transport’s BLE safeguarding directions</u>, must <u>(unless exempted in those directions)</u> demonstrate that <u>the proposed</u> development will not preclude or delay the delivery <u>or operation</u> of the BLE, will not lead to excessive cost in the delivery <u>or operation of the BLE</u>, and must <u>will</u> be compatible with the BLE <u>during delivery and operation</u> (for example, in relation to vibration from the tunnels), both during construction and in operation. Foundation and basement design will be particularly critical for over tunnel alignments, ground level needs at stations and for other work sites. Development proposals must also be designed to optimise the</p>

Policy	Page	Comment/Amendment
		<p>accessibility provided by the introduction of the BLE into the local area. This may include provision for new or improved public realm and transport infrastructure enhancements.</p> <p>D Development proposals should optimise the use of land and capacity of sites taking into account the BLE and future improvements to Public Transport Access Levels enabled by its delivery. The Council will seek to ensure that development on sites in proximity to existing, planned or potential future Bakerloo line stations is appropriately phased in order to secure the most beneficial use of land, particularly to help meet Lewisham's housing needs. <u>Development proposals must also be designed to optimise the accessibility provided by the introduction of the BLE into the local area. This may include provision for new or improved public realm and transport infrastructure enhancements.</u></p> <p>The explanatory paragraph 12.12 should also be amended to clarify the safeguarding requirements and separate the matters of public realm and transport infrastructure enhancements from safeguarding, in accordance with the above recommendations on parts C and D of the policy.</p> <p>Part D: It would be helpful to set out in more detail when phasing may be required and what will be required from the developer in terms of documents and actions.</p>
TR3: Healthy streets as part of healthy neighbourhoods	415	Part C: The 'key movement corridors' are not defined in this policy. It would be helpful to include a table or figure identifying these, so that they can be coordinated with other walking and cycling routes referred to in part D of the

Policy	Page	Comment/Amendment
		<p>policy. This will enable developments to include appropriate Healthy Streets improvements as part of the scheme or secured through section 106 or section 278 agreements. A plan-led approach to delivery will enable coordination between development and funding for improvements.</p> <p>The approach to transform major arterials (including portions of the A20 and the A205 South Circular) in policy TR3 and explained in paragraph 12.17 in line with Healthy Streets is strongly supported, but more specificity would be encouraged in identifying what these public realm improvements and new walking and cycling infrastructure would look like.</p> <p>Part I regarding active travel training and funding is welcomed and could be supported by adding the following to paragraph 12.21: <u>'Funding can be secured from developments for projects and programmes such as cycle training to support this.'</u></p> <p>Part G: A reference to Low Traffic Neighbourhoods as a type of intervention could be added to the last sentence of this part: 'This may include interventions to reduce, re-route or calm vehicular traffic (particularly around schools and other community facilities) and/or lower speed limits in localities, as well as to enhance the quality and safety of the walking and cycle environment, <u>or to create Low Traffic Neighbourhoods</u>'.</p>
TR4: Parking	419	<p>Part A: This approach to prioritising car-free and car-lite development is in accordance with policy T6 (Car parking) of the London Plan and is supported.</p> <p>It is recommended that the meaning of car-lite is clarified in the policy: 'In line with the London Plan, car-free development should be the starting point for all</p>

Policy	Page	Comment/Amendment
		<p>development proposals in places that are, or are planned to be well-connected by public transport, with developments elsewhere designed to be car-lite, <u>with parking minimised as far as possible.</u></p> <p>Part B: It is welcomed that car-free development is now proposed to be supported in areas of lower PTAL, subject to availability of alternative transport infrastructure. However, the need for a requirement for locations to be 'highly accessible' in addition to 'well-connected' already introduced in part A is not supported. 'Well-connected' is considered sufficient, and the difference between the two terms is not explained. The first sentence of part B should therefore be amended to: <u>Development proposals for car-free development will be supported in locations well-connected by public transport. where they are located in highly accessible and well-connected locations.</u></p> <p>The items a.–d. under Part B are supported as being appropriate additional locations for car-free development. However, the structure of the list in part B is unclear: item a. ends with 'or', item b. ends with 'and' and item c. ends with no conjunction. The relationship between items a.–d. should be clarified. For item c., while controlled parking zones are strongly supported, London Plan policy T6C (Car parking) states that a lack of controlled parking zones should not prevent development.</p> <p>Parts C and D: These are in accordance with the London Plan parking maximums and disabled parking requirements and so are supported. The following should be added to Part D to reinforce London Plan policy T6.IH (Residential parking):</p>

Policy	Page	Comment/Amendment
		<p data-bbox="853 276 2029 347"><u>'Residential disabled persons parking should not be allocated to specific dwellings, so that it does not end up being used as general parking if there is a turnover of residents.'</u></p> <p data-bbox="853 400 1995 512">Parts E and F: The cycle parking requirements accord with the London Plan and so are supported. The requirement for provision of cycle hire and cargo cycle space for certain developments where feasible is supported.</p> <p data-bbox="853 564 1966 636">Part H: The requirement of car-free development to be parking permit free is welcomed.</p> <p data-bbox="853 689 2029 888">Parts I to K: The electric vehicle charging and parking design and management plan (PDMP) requirements are consistent with the London Plan and so are supported. The following should be added to Part I to reinforce London Plan policy T6.IB (Residential parking): <u>'Parking spaces within communal car parking facilities should be leased rather than sold.'</u></p> <p data-bbox="853 941 2011 1181">Explanation of the purpose of PDMPs should be added as a new paragraph 12.29: <u>'PDMPs allow consideration of the provision of electric vehicle charging points, how disabled persons parking spaces will be provided upon request, how space might be converted in future as needs change, strategies to reduce car parking over time as sustainable transport infrastructure is improved and car ownership levels decrease, and how cycle parking areas will be designed and managed.'</u></p> <p data-bbox="853 1233 2018 1345">Paragraph 12.24: The meaning of this explanatory text is somewhat unclear. It notes that the Council will work with stakeholders including TfL and National Rail to 'address step-free access and deliver this provision which is necessary for</p>

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		<p>inclusive and well-connected neighbourhoods.' It is unclear what 'this provision' refers to. If it refers to step-free access, this would be supported, but the wording and placement of the text in the explanatory text of policy TR4 (Parking) implies that it may be about car parking. If this is the case, the lack of step-free access does not justify higher car parking provision on high PTAL sites. The paragraph should be revised and moved or deleted from the plan.</p> <p>It is recommended that the issue of car clubs is separated from that of electric vehicles in paragraph 12.27, to better indicate the potential benefits of car clubs, with additional guidance on how car clubs can be used to lower overall levels of car parking and encourage sustainable transport choices as well as noting their limitations and circumstances in which they would not be supported. Paragraph 12.27 should be amended: 'The use of car clubs and electrically charged or Ultra-Low Emission vehicles can provide an alternative to car ownership and conventional gas fuelled vehicles. Development proposals must make appropriate provision for rapid electrical vehicle charging points, also having regard to the Council's Low Emission Vehicle Charging Strategy. However in light of the climate emergency the use of car clubs and Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality.'</p> <p>A new paragraph 12.28 should provide explanation on car clubs, such as: '<u>Car clubs can be useful in supporting car-free development. The best way to implement them is with an associated reduction in the overall number of parking spaces in an area. Simply</u></p>

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		<p><u>adding car club cars to areas with lots of parking is not an effective way to reduce car ownership or use and is rather more likely to increase the dominance of vehicles on the streets In new developments, car clubs should be deployed as a means to reduce the overall volume of parking and where they can provide for occasional car use for households that are prevented from owning their own car, where parking levels are very low, and they should include electric vehicle charging points.'</u></p>
TR5: Deliveries, servicing and construction	423	<p>The approach to requiring sustainable freight, off-street deliveries and operational parking, and demonstration of this through delivery and servicing plans, is supported.</p>
TR6: Taxis and private hire vehicles	425	<p>Part Ac. currently could imply that any loss of general on-street parking for use by taxis or private hire vehicles would be unacceptable. However, the use of on-street space for these purposes may result in fewer car trips and could provide additional flexibility which accords with the London Plan Good Growth objective of making the best use of land. Part Ac. should be rephrased to remove reference to on-street parking: 'It is suitably demonstrated that there will be no adverse impact on amenity and the highway network, including existing on-street parking provision'.</p>
TR7: Digital connectivity	427	<p>Part De.: Requiring a minimum residual footway should apply to any road, not just 'main' roads. In addition, it would be helpful if the policy referred to what a suitable minimum width would be or how this could be determined. This part should be amended to: 'If located on a main road or walking route, a minimum residual footway is provided, <u>to ensure comfort and safety for all road users</u>'.</p>

Policy	Page	Comment/Amendment
		<p>In paragraph 12.44 of the explanatory text, the reference to 1.8m should be replaced with 2m, which is the minimum set out in the Manual for Streets³, Inclusive Mobility⁴ and TfL's Streetscape Guidance.⁵ The reference to ensuring appropriate pedestrian flow is supported and TfL guidance should also be referenced to support this: <u>The Government guidance documents Manual for Streets and Inclusive Mobility, as well as Transport for London's Streetscape Guidance and Pedestrian Comfort Guidance</u>⁶ should be referred to for guidance on appropriate residual distances where development is located on a main road or walking route. In town centres and other high traffic areas, the minimum residual distance of 1.8 2 metres may not be sufficient to enable appropriate pedestrian flow, and the minimum width will be determined based on the number of pedestrians per square metre and pedestrian flows per minute.'</p>
Lewisham's Central Area site allocations		
I: Lewisham Gateway	458	<p>This site is in PTAL 6b and the existing planning permission allows for the provision of 500 car parking spaces. There is no mention of cycle parking in this phased development. Since there are various phases of this development, we encourage any future changes and planning permissions be geared towards car-free development for both residential and non-residential uses. A reduction in car parking provision will achieve better air quality in this air quality focus area, as</p>

³ assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf, paras 6.3.22–6.3.23.

⁴ assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1044542/inclusive-mobility-a-guide-to-best-practice-on-access-to-pedestrian-and-transport-infrastructure.pdf, p. 28.

⁵ content.tfl.gov.uk/streetscape-guidance-2022-revision-2.pdf, pp. 205–10.

⁶ content.tfl.gov.uk/pedestrian-comfort-guidance-technical-guide.pdf.

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		well as make better use of land and reduce costs. Dedicated cycle lanes should also be considered to improve safety and encourage people to cycle.
5: Land at Conington Road and Lewisham Road (Tesco)	471	Paragraph 14.45.9 which requires the retention or re-provision of the bus stop and stand facility that are currently provided on this site is supported.
6: Thurston Road Bus Station	474	<p>The existing bus stand at Thurston Road is the identified site for a BLE station box. The layout of the new station is unlikely to permit a sufficient bus stand to return to the site once the station works are complete. However, this has not been technically assessed and proven, although it is highly likely to be the case. Current feasibility studies will help identify what scope exists to return the bus stand back to Thurston Road. The lack of provision for a temporary bus stand within the local plan is concerning.</p> <p>Following extensive investigation work and meetings with Lewisham, Molesworth Street Car Park had been identified as a preferred site to locate a bus stand during the construction of the station. While in the regulation 18 version of the local plan Molesworth Car Park was referred to as a site allocation, it has since been removed. We had understood that the use of the car park as a temporary bus stand would be identified in the site allocations, similar to that shown in the regulation 18 local plan. The removal of this site allocation risks the protection of land in the town centre to facilitate a bus stand. The delivery of a temporary bus stand within the town centre is critical to permitting the delivery of the BLE and operation of the bus network in this area. Sufficient reassurances are needed within the local plan to enable TfL to deliver the strategic infrastructure widely documented within the local plan.</p>

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		<p>We strongly recommend that the local plan identifies and commits to potential alternative sites which could accommodate a future bus stand within the locality of the Gateway. The existing bus services are relied upon and primarily used by Lewisham residents for travel to work, for shopping and for other needs in the borough and must be considered alongside promoting the delivery of the BLE.</p> <p>TfL asks that provision is made for accommodating a bus stand within the site allocations.</p>
7: Lewisham Retail Park, Loampit Vale	476	Paragraphs I4.52.2 and I4.53.5 that require that development not prejudice the delivery of the BLE and identify that the BLE could affect redevelopment of the site are supported.
I3: PLACE/Ladywell (former Ladywell Leisure Centre)	491	<p>The site allocation should emphasise the need for comprehensive development of the whole site, with concern that the current application under consideration does not consider the replacement of the existing temporary building and raises some conflicts with its future replacement.</p> <p>Paragraph I4.82.2 should be more specific about proposals for the very wide footway in front of the temporary building, since at present it is used for unlawful parking. Retention of this very wide footway is only a beneficial public asset if it is planned, designed and managed appropriately. It should not be used for car parking.</p>
I8: Catford Island	503	Paragraph I4.I07.2: The requirement to not prejudice the delivery of the realignment of the A205 is supported, but this should be extended to include working with TfL to deliver elements of the improvements along the sites' frontages, including through section 278 and section I06 obligations: 'Development must not prejudice the delivery of transport infrastructure,

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		<p>including public realm enhancements associated with the re-alignment of the A205. <u>Applicants should work in partnership with TfL to deliver elements of the improvements along the sites' frontages.</u> The siting of buildings must ensure the traffic and transport improvements along the South Circular at Sangley Road, Plassy Road and Brownhill Roads can be implemented in full.</p> <p>12 Brownhill Road has been included in the site allocation but is a small, privately owned housing site. It may be unnecessary to include this site within the allocation. Note that the 12 Brownhill Road site is rectangular and does not include the triangle-shaped area behind the hoarding on the TfL site adjacent at the corner of Brownhill and Plassy Roads.</p> <p>The development requirements in paragraph 14.107 should make specific mention of permeability through the wider site, including across the various land ownerships, rather than just connections to the surrounding street network. Paragraph 14.107.3 should be amended as follows: 'The site must be re-integrated with the surrounding street network to improve access and permeability in the local area, and to better integrate the site with the Primary Shopping Area. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors, as well as <u>permeability between and through the various land ownerships that make up the site.</u>'</p>
I9: Laurence House and Civic Centre	506	<p>It may be helpful to note that Lawrence House is a temporary building at the end of paragraph 14.110: '<u>Lawrence House was designed as a temporary building to enable redevelopment following the A205 realignment.</u>' The development guidelines in paragraph 14.112.6 should be amended to refer to links to the stations: 'Development should improve opportunities for walking, cycling and other active</p>

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		travel modes along A205 Catford Road, <u>including to Catford and Catford Bridge stations</u> , contributing to the A21 Healthy Streets Corridor.’ The replacement and improvement of bus facilities lost due to the realignment outside Lawrence House, the Civic Centre and Broadway Theatre should be included as a development requirement in paragraph 14.111.4: ‘Applicants must work in partnership with Transport for London to deliver the realignment of the A205 South Circular, ensuring it is integral to the development of the site. <u>There must be provision for buses and replacement and improvement of bus facilities lost due to the realignment.</u> ’
20: South Circular	509	We support the inclusion of this site allocation for the re-routing of the A205 South Circular, which will support the regeneration of the town centre and improvements to walking, cycling and public transport.
21: Wickes and Halfords, Catford Road	511	This is a large site and that its development should be comprehensive (14.117), and in accordance with the Catford Town Centre Framework (13.119.1), is supported. The references to connections to Waterlink Way, routes to Catford and Catford Bridge stations, rationalisation of vehicle entrances to the site and connections through the railway arches in the development requirements (14.119) and development guidelines (14.120) are supported. The connections to the stations and through the railway arches should consider pedestrian crossings on the A205 and A212 roads. Paragraph 14.120.8 should therefore be amended as follows: ‘Proposals should investigate and maximise opportunities to facilitate links through the railway arches <u>and across the A212 as well as links across the A205.</u> ’
Not allocated: Big Yellow Storage, 155 Lewisham Way, London SE14 6QP and Wearside Depot, Wearside Road, London SE13 7EZ		These sites are not identified as site allocations but are critical for the delivery of the BLE. The formal safeguarding directions will give a degree of protection to the sites and future development. However, identifying future uses of the sites through a site allocation in the local plan, including for BLE infrastructure would

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		best protect the interests of the BLE, and new London Underground services to Lewisham.
Lewisham's North Area key spatial objectives	523	<p>While objective 9 refers to the expansion of cycle hire throughout the North Area, additional specific locations where it could be added should be referenced in objectives 10 and 11, as below.</p> <p>10: To this objective should be added: '<u>Expand the cycle hire scheme along the River Thames and Deptford Creekside.</u>'</p> <p>11: To this objective should be inserted: 'Protect and enhance open and green spaces, including waterways. Continue to deliver and expand the North Lewisham Links, a connected network of high-quality walking routes and cycleways that link these spaces, <u>including supporting the potential for any cycle hire expansion along these routes.</u> Ensure these routes address existing barriers to movement, such as those caused by the tangle of railways and major roads.'</p>
LNA2: New Cross Road / A2 corridor	528	The following text should be added to Part C: ' <u>Cycle hire provision should be expanded along New Cross Road.</u> '
Lewisham's North Area site allocations		
9: Surrey Canal Triangle Mixed-use Employment Location	562	<p>Note that under paragraphs 15.65.6 and 15.65.9 new walking and cycling routes would be supported by TfL but they should be designed to be compatible and integrated with the stations.</p> <p>We request a commitment to the delivery of a bus interchange including stands, stops, circulation system and driver facilities. This should be adjacent to the proposed Surrey Canal station. Before the station is operational, a temporary bus</p>

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		<p>stand with driver facilities is required on Landmann Way to serve phase I of the Renewal development and other nearby schemes in Lewisham, such as Apollo. The development requirements in paragraph 15.64.8 should therefore be amended as follows: 'Provision for the new transport infrastructure within the site, including a new Overground station at Surrey Canal Road and an accompanying walking and cycle bridge and bus interchange, as well as temporary bus stand before the station is operational, in partnership with TFL and infrastructure providers.' This would ensure the development has links to central and inner London including Convoys Wharf, Deptford, New Cross and the Lewisham town centre.</p>
II: Former Hatcham Works, New Cross Road	569	<p>This allocation provides strong protection for use of the site as a new BLE station. Lewisham should consider using the local plan for safeguarding lands surrounding the site, including that of the existing railway station (New Cross Gate).</p> <p>The time period for delivery starts in 6–10 years. We question this timescale, given the site is protected for BLE construction, the period for which is likely to extend beyond this.</p> <p>This site allocation should require car-free development.</p>
Lewisham's East Area site allocations		
3: Leegate Shopping Centre	620	<p>'Planning status' should be updated to include planning application DC/22/126997, which is currently under consideration.</p>

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		There should be an additional development requirement: ' 5. Retention of existing mature trees. ' This would ensure the retention of the mature trees on the Eltham Road frontage of the site, which are a positive feature of the area.
LSA1: South Area place principles	643	Part C: The phasing of development where the BLE will materially impact on travel behaviour is supported. Lewisham should support this by setting out how its evidence base will highlight where shortcomings exist or may become apparent as development comes forward.
LSA3: Bell Green and Lower Sydenham	648	<p>Part A states 'The designation of an Opportunity Area at Bell Green and Lower Sydenham in a future review of the London Plan will be strongly supported by the Council.' Subject to any future decision to extension the Bakerloo line beyond Lewisham to Hayes and Beckenham Junction, such a designation would be supported in principle as it would enable the extension to better support the delivery of new homes and jobs that would otherwise be constrained by limited public transport capacity. Any build out of the potential future Opportunity Area would need to ensure that it could accommodate the provision of the future BLE, including all necessary supporting infrastructure.</p> <p>It is recommended that the first sentence of paragraph 17.11 is amended, as designation would require further consideration by the Greater London Authority and TfL, and the extent of this consideration does not currently amount to the area being 'poised' to become an Opportunity Area: 'The Bell Green and Lower Sydenham area is poised to become one of London's next Opportunity Areas, and the Council will support <u>this the</u> designation <u>of the Bell Green and Lower Sydenham area as an Opportunity Area</u> in a future review of the London Plan.'</p>

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		<p>Part C implies that land is 'safeguarded' for the BLE to Hayes. A distinction should be made between the 'safeguarding' as a matter of planning policy, and the formal safeguarding directions made by Secretary of State for Transport on 1 March 2021 in respect of the BLE, which, as per our comments on policies TR1 (Sustainable transport and movement) and TR2 (Bakerloo line extension), must be complied with under the Town and Country Planning (Development Management Procedure) (England) Order 2015 and relate to phase I of the BLE.</p> <p>The site allocation is unclear as to what will be safeguarded beyond a station. Although not yet confirmed, the BLE would likely require a stabling site in the vicinity of either of these two sites if Phase 2 were to come forward. TfL would welcome specific wording about a stabling/maintenance facility being included within the site allocations for these areas. Alternatively, we would welcome the ability to include this in the next review phase of the local plan.</p> <p>The principles set out in the policy by way of protecting future BLE infrastructure requirements are welcomed.</p>
LSA4: A21 corridor / Bromley Road	651	Part D should refer to improving walking, cycling and bus connectivity to National Rail and DLR stations, to deliver broader connectivity.
Lewisham's West Area site allocations		
2: 6 Mantle Road	710	We welcome paragraph 18.22.2 which includes consultation with TfL on railway station developments.
5: Land at Forest Hill Station west (Devonshire and Dartmouth Roads)	716	Public realm improvements and consideration of development of the car park would be strongly supported.

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6: Perry Vale Locally Significant Industrial Site	718	Development of the car park would be strongly supported.
II: Land at Sydenham Road and Loxley Close	729	Paragraph 18.60.1 should refer to Policy TR4 (Parking), to clarify that parking should not exceed the maximums in that policy: 'Development should make a more optimal use of land by considering options for the car park, including rationalising the existing level of provision, taking into account needs of visitors and businesses along with public transport accessibility levels, <u>and in accordance with the maximums set out in Policy TR4 (Parking).</u> '
DM2: Infrastructure funding and planning obligations	743	<p>Part E lists a number of issues that may be addressed through planning obligations, but there is currently no indication of the priority should financial viability issues arise. While paragraph 19.12 notes the priority given to affordable housing and transport infrastructure obligations in the London Plan, Part E should be amended to make it clear that affordable housing and transport infrastructure share joint highest priority, as set out in policy DFID (Delivery of the plan and planning obligations) of the London Plan.</p> <p>Government guidance indicates that policy requirements for planning obligations should be clearly set out so that they can be accounted for by developers. While DM2 refers to planning obligations in connection with 'public transport improvements', TfL consider it should explicitly refer to the BLE and the potential for it to be funded in part from the Community Infrastructure Levy (CIL) and planning obligations. It remains our view that it would be advantageous for Lewisham to commit to identifying how planning obligations can support the funding of the BLE, as there will be an expectation that significant developer contributions would be needed alongside, for example, other borough funding. Similarly, a dedicated proportion of CIL or other levy could alleviate uncertainty</p>

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		for developers and would reflect the relationship between the BLE and its integral role in unlocking developments in Lewisham.
DM7: Monitoring and review Infrastructure Delivery Plan	755	Ref. LP114: The text should say 'London Plan' rather than 'draft London Plan'.
5.1.6	66	The number of new DLR trains should be corrected as follows: 'In 2017 TfL began the process of replacing the existing DLR trains with 57 <u>54</u> new ones.' The new trains will begin to rollout in 2024, though the specific date for the uplift to 30 trains per hour is not yet confirmed.
5.1.13	67	<p>It is our understanding that all trains that pass through Lewisham station stop at that station. If this paragraph is instead referring to trains that bypass Lewisham on separate lines, this should be clarified.</p> <p>The 'New Cross to Lewisham Overground extension' is not currently being progressed by TfL, with the BLE being our preferred scheme in this location.</p>
5.1.42	72	This should be updated as follows: ' From October 2021 the The ULEZ will be expanded to includes all areas of the borough to the north of the South Circular. In the longer term the Council will assess the feasibility of seeking to further expand the ULEZ to cover the entire borough.'
Strategic infrastructure list for transport infrastructure	76	<p>The 'indicative timescale for project delivery' for the 'Bakerloo line extension and upgrade' should be shown as 2035–2045 rather than 2020–2035.</p> <p>The 'New Cross to Lewisham Overground extension' is not currently being progressed by TfL, with the BLE being our preferred scheme in this location.</p>



Lewisham Local Plan: Proposed Submission Document – Regulation 19 Consultation Guidance Note

The Local Plan will play a vital role in how we manage new development and coordinate investment. Throughout the preparation of the plan, we have sought to ensure that everyone with an interest in Lewisham has had the opportunity to help shape the new plan.

A Regulation 19 consultation is the next stage of the Local Plan consultation process. As part of the Regulation 19 consultation, we have prepared the **Local Plan: Proposed Submission Document** for public consultation which has been informed by the previous consultation and engagement exercises we have undertaken for the new plan. This includes public consultations on the Issues and Options document in October - November 2015, the Main Issues and Preferred Approaches Document in January - April 2021, Call for Sites exercises and engagement on evidence base documents.

During this consultation the Local Plan: Proposed Submission Document and its supporting documents will be made available for public inspection to provide any individual, group, or business the opportunity to make a representation.

This Guidance Note should be read in conjunction with the Statement of Representation Procedure.

Title of documents available for inspection and subject to this consultation:

- Lewisham Local Plan: Proposed Submission Document January 2023.
- Proposed Policies Map and Schedule of Proposed Changes to the Adopted Policies Map December 2022.
- Integrated Impact Assessment and Non-technical Summary December 2022.
- Habitats Regulations Assessment December 2022

This consultation will require submissions to specifically focus on the following issues:

Is the Plan Legally Compliant?

Does the Plan comply with the relevant legislation and regulations in the way it has been prepared, and in its content?

The Planning Inspector will first check that the Local Plan meets the legal requirements of the Planning and Compulsory Purchase Act 2004 (as amended) (the Act) and the Regulations before moving on to consider the tests of soundness.

The Local Plan must meet the legal requirements under sections 19,20 and 24 of the Act, and duty to cooperate under section 20(5)(c) of the Act. To be legally compliant, it should:

- Be prepared in accordance with the Council’s Local Development Scheme (LDS).
- Be prepared in accordance with the Statement of community Involvement (SCI).
- Comply with the Regulations.
- Be supported by a Sustainability Appraisal (SA) report.
- Have regard to national policies and advice.
- Be in general conformity with the London Plan.

Does the Plan comply with the ‘Duty to Cooperate’?

Lewisham Council must have demonstrated how it engaged constructively, actively and on an ongoing basis with adjoining Local Planning Authorities and other public bodies throughout the production of the Local Plan.

Is the Plan Sound?

Has the Plan been ‘positively prepared’? Is it robustly justified and evidence-led? Will it be effective in what it sets out to achieve? Is it consistent with regional and national planning policy?

The National Planning Policy Framework (NPPF) (para.35) sets out that in order to be ‘sound’ a Local Plan should pass the following tests:

Be positively prepared	Providing a strategy which, as a minimum seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development.
Be Justified	An appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence.
Be Effective	Deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred.
Be consistent with national policy	Enabling the delivery of sustainable development in accordance with the policies in the NPPF.

How to complete the representation form

In submitting a representation, you will need to complete an online or physical representation form. When completing the form please:

- Complete a new representation form for each issue you wish to comment on.
- Clearly identify which policy or part of the Plan your representation relates to.
- Indicate by ticking the relevant box if you wish to speak at the Examination.

Where can I inspect the Local Plan and its supporting documents

You can inspect physical copies of the documents, the Consultation Statement main report and appendices and the Statement of Representations Procedure as well as other supporting documents at the following locations:

- London Borough of Lewisham, Laurence House, 1 Catford Road, London, SE6 4RU.
- Catford Library, Catford Centre, 23-24 Winslade Way, London, SE6 4JU.

If you wish to inspect the documents at Laurence House, please make an appointment by emailing localplan@lewisham.gov.uk or calling 02083147400

(Please note that you need to make an appointment by e-mailing LocalPlan@Lewisham.gov.uk if you wish to inspect the Plan and its supporting documents at Laurence House).

You can inspect physical copies of the documents, the Consultation Statement main report excluding the appendices and the Statement of Representations Procedure at the following locations:

- Deptford Lounge Library, 9 Giffin Street, London, SE8 4RJ.
- Grove Park Community Centre, Somertrees Avenue, London, SE12 0BX.
- Forest Hill Community Library, Dartmouth Road, London, SE23 3HZ.
- Downham Library, 7-9 Moorside Road, Bromley, BR1 5EP.
- Lewisham Library, 199-201 Lewisham High Street, London, SE13 6LG.

Information on Library opening times can be found at: <https://lewisham.gov.uk/myservices/libraries/branches> or by calling 02083147400.

Online Meetings

The Council will be holding two online information sessions from 6.00pm to 8.00pm on Thursday 16th March 2023 and from 6.00pm to 8.00pm on Thursday 23rd March 2023. To register your interest, please use this link:

<https://consultation.lewisham.gov.uk/planning/reg19consultation>

Local Plan Drop in sessions

There will also be a drop-in session at Unit 69 East Mall, Lewisham Shopping Centre from 10.00am to 4.00pm on Saturday 25th March 2023. Further information can be found at: <https://consultation.lewisham.gov.uk/planning/reg19consultation>

Have your say

The consultation is open from **1st March 2023 to 25th April 2023**.

For further information and to have your say, visit:

<https://consultation.lewisham.gov.uk/planning/reg19consultation>

Email - localplan@lewisham.gov.uk

Complete the following questionnaire and return to: Planning Service, Laurence House, 1 Catford Rd, Catford, London, SE6 4RU.

Representations must be received by **midnight on Tuesday 25th April 2023**.

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential. All representations will then be submitted to the Secretary of State for Levelling Up, Housing and Communities and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

What happens next?

All representations received will be recorded and considered and the representations will be submitted to an independent examiner. In addition, all comments will be recorded and collated within a Consultation Statement.

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

<https://councilmeetings.lewisham.gov.uk/documents/s105304/LDS%20Appendix.pdf>

Thank You

We would like to thank you for your support and involvement so far as we invite you once again to comment on our Local Plan and supporting documents before we submit them to the Secretary of State for independent examination.

Lewisham Local Plan – Proposed Submission document Regulation 19 draft Consultation Questions

This form has two parts

Part A – Personal details to be completed once

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A - Personal Details

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

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Organisation	Thames Water	Post code	RG1 8DB
Telephone number	07747 647031	E-mail Address	David.wilson@thameswater.co.uk

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- | | | | | | |
|---|--|-----|----|--------------------------|----------------------------|
| <p>1. To which chapter of the Lewisham Local Plan – Proposed Submission document does your representation relate?</p> | <p>Chapter name
Site Allocations</p> <input style="width: 100%; height: 20px;" type="text"/> | | | | |
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| <p>3. Do you consider that this part of the chapter is legally compliant?</p> | <table border="0"> <tr> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> | Yes | No | <input type="checkbox"/> | <input type="checkbox"/> |
| Yes | No | | | | |
| <input type="checkbox"/> | <input type="checkbox"/> | | | | |
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If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments.

Continue answer on separate sheet if necessary.

The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.

The attached table provides Thames Water’s site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated
- Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.



7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

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Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes

No

(I do wish to participate in an examination hearing session) (I do not wish to participate in an examination hearing session)

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. *Continue answer on separate sheet if necessary.*





Lewisham Local Plan: Proposed Submission Document – Regulation 19 Consultation Guidance Note

The Local Plan will play a vital role in how we manage new development and coordinate investment. Throughout the preparation of the plan, we have sought to ensure that everyone with an interest in Lewisham has had the opportunity to help shape the new plan.

A Regulation 19 consultation is the next stage of the Local Plan consultation process. As part of the Regulation 19 consultation, we have prepared the **Local Plan: Proposed Submission Document** for public consultation which has been informed by the previous consultation and engagement exercises we have undertaken for the new plan. This includes public consultations on the Issues and Options document in October - November 2015, the Main Issues and Preferred Approaches Document in January - April 2021, Call for Sites exercises and engagement on evidence base documents.

During this consultation the Local Plan: Proposed Submission Document and its supporting documents will be made available for public inspection to provide any individual, group, or business the opportunity to make a representation.

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This consultation will require submissions to specifically focus on the following issues:

Is the Plan Legally Compliant?

Does the Plan comply with the relevant legislation and regulations in the way it has been prepared, and in its content?

The Planning Inspector will first check that the Local Plan meets the legal requirements of the Planning and Compulsory Purchase Act 2004 (as amended) (the Act) and the Regulations before moving on to consider the tests of soundness.

The Local Plan must meet the legal requirements under sections 19,20 and 24 of the Act, and duty to cooperate under section 20(5)(c) of the Act. To be legally compliant, it should:

- Be prepared in accordance with the Council’s Local Development Scheme (LDS).
- Be prepared in accordance with the Statement of community Involvement (SCI).
- Comply with the Regulations.
- Be supported by a Sustainability Appraisal (SA) report.
- Have regard to national policies and advice.
- Be in general conformity with the London Plan.

Does the Plan comply with the ‘Duty to Cooperate’?

Lewisham Council must have demonstrated how it engaged constructively, actively and on an ongoing basis with adjoining Local Planning Authorities and other public bodies throughout the production of the Local Plan.

Is the Plan Sound?

Has the Plan been ‘positively prepared’? Is it robustly justified and evidence-led? Will it be effective in what it sets out to achieve? Is it consistent with regional and national planning policy?

The National Planning Policy Framework (NPPF) (para.35) sets out that in order to be ‘sound’ a Local Plan should pass the following tests:

Be positively prepared	Providing a strategy which, as a minimum seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development.
Be Justified	An appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence.
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How to complete the representation form

In submitting a representation, you will need to complete an online or physical representation form. When completing the form please:

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Have your say

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Email - localplan@lewisham.gov.uk

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Thank You

We would like to thank you for your support and involvement so far as we invite you once again to comment on our Local Plan and supporting documents before we submit them to the Secretary of State for independent examination.

Lewisham Local Plan – Proposed Submission document Regulation 19 draft Consultation Questions

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Title	Mr	Address Line 1	Clearwater Court
First Name	David	Line 2	Vastern Road
Last Name	Wilson	Line 3	Reading
Job Title	Town Planner	Line 4	
Organisation	Thames Water	Post code	RG1 8DB
Telephone number	07747 647031	E-mail Address	David.wilson@thameswater.co.uk

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SD10 – Water Supply and wastewater
3. **Do you consider that this part of the chapter is legally compliant?** Yes No
4. **Do you consider that this part of the chapter sound?** Yes No
5. **Do you consider that this part of the chapter is compliant with the Duty to Co-operate?** Yes No
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Continue answer on separate sheet if necessary.

LEWISHAM LOCAL PLAN



We support Policy SD10 as it is largely in line with our previous representations.

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.

Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure.

Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”

Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”

Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...”

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).

Policy SI5 of the new London Plan relates to water and wastewater infrastructure and supports the provision of such infrastructure to service development.

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. We therefore support Policy SD10 in this respect.

In relation to supporting paragraph 11.63 – it should be clarified that Thames Water record ‘reported’ flooding incidents. Therefore, if they aren’t reported to us we don’t necessarily know.

Water Efficiency

We also support Part D of Policy SD10 which sets out that planning conditions will be applied to ensure that water efficiency standards are met.

The Environment Agency has designated the Thames Water region to be an area of “serious water stress” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. On average our customers each use 30% more water than they did 30 years ago. Therefore water efficiency measures employed in new development are an important tool to help us sustain water supplies for the long term.

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

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link:
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 110 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is

effectively delivered through the building regulations. We therefore support Policy SD10 D in referring the use of planning conditions. However, clarification should be provided in relation to the preferred 'Fittings Approach'.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

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We therefore consider that paragraph 11.68 should be amended to refer to state:
 “.....All new residential developments (including replacement dwellings) will meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, using the 'Fittings Approach' in table 2.2 as set out in Building Regulations part G2. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.....”

Paragraph 11.63 should be amended to clarify that Thames Water only record 'reported' flooding incidents.

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Last Name	Wilson	Line 3	Reading
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2. **To which part of the chosen chapter does you representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)** Policy name/number SD8: Sustainable Drainage
3. **Do you consider that this part of the chapter is legally compliant?** Yes No
4. **Do you consider that this part of the chapter sound?** Yes No
5. **Do you consider that this part of the chapter is compliant with the Duty to Co-operate?** Yes No
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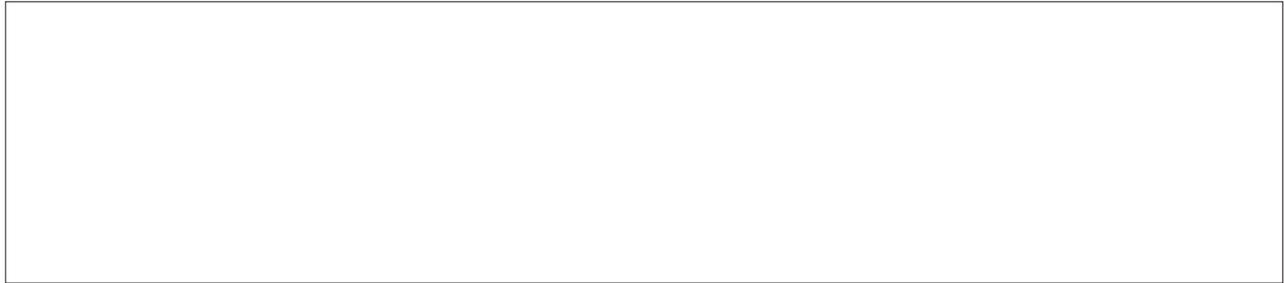
We support Policy SD8 in principle.

In regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy set out in the London Plan. It is important to reduce the quantity of surface water entering the sewerage system in order to maximize the capacity for foul sewage to reduce the risk of sewer flooding.



Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.



7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

*(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. **Continue answer on separate sheet if necessary.***

With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: ***“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”***

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes

No

(I do wish to participate in an examination hearing session) (I do not wish to participate in an examination hearing session)

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. *Continue answer on separate sheet if necessary.*



Lewisham Local Plan Regulation 19 Consultation, April 2023 – Thames Water Site Comments

Site ID	Site Name	Water Response	Waste Response	Additional Comments
68361	100-114 Loampit Vale	<p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>

55648	AXION HOUSE, 1 SILVER ROAD, LONDON, SE13 7BQ (Pending) *SPZ1*	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
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8252	Catford Centre and Milford Towers (Reviewed Jan21) *SPZ1*	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>Waste: As the development is located on a Brownfield site there may be existing sewers or rising mains crossing the site. Where these sewers or rising mains are to become redundant or have to be diverted the full cost of administering and undertaking the works shall be financed by the developer.</p>
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8275	CATFORD ISLAND *SPZ2*	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
26551	<p>Driving Test Centre, Nightingale Grove, Hither Green, SE13 (Reviewed Jan21) *SPZ2*</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>

73652	FORMER LADYWELL LEISURE CENTRE, 261 LEWISHAM HIGH STREET, LONDON, SE13 6NJ (PENDING) *SPZ2*	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
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14881	FORMER TESCO'S CAR PARK, 209 CONINGTON ROAD, LONDON, SE13 7LH (PENDING) *SPZ1*	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	<p>The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	
68366	House on the Hill at Slaithwaite Road *SPZ2*	<p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>

59954	Ladywell Playtower Ladywell Road London SE13 7UW *SPZ1*	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
64452	Land at Conington Road and Lewisham Road (Tesco) *SPZ1*	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

68335	Land at Engate Street *SPZ1*	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	<p>The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	
26552	Land at Nightingale Grove and Maythorne Cottages *SPZ2*	<p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>

68364	Land at Rushey Green and Bradgate Road (Aldi) *SPZ2*	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
37276	Laurence House and Civic Centre (Reviewed Jan21) *SPZ1*	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

57196	LEWISHAM GATEWAY, LEWISHAM HIGH STREET, LONDON, SE13 (Approved Nov 18) *SPZ1*	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
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49073	LEWISHAM RETAIL PARK, LOAMPIT VALE, LONDON, SE13 7SN (Approved 28/03/19) Reviewed Jan21 *SPZ1*	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
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60137	Lewisham Shopping Centre, Molesworth Street, London-SE13 7HB *SPZ1*	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	<p>The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	
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68362	Ravensbourne Retail Park *SPZ1*	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
74576	Thurston Road Bus Station *SPZ1*	<p>The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the water supply network infrastructure. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.</p>	<p>The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.</p>	

68363	Wickes and Halfords, Catford Road *SPZ1*	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
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Date: April 2023

Our ref: TTLP/Planning/CG/LB – LBLR19

Transport for London
TTL Properties Limited

Victoria Station House
191 Victoria Street
London
SW1E 5ND

By email: localplan@lewisham.gov.uk

ChristianGonito@tfl.gov.uk
or
propertyconsultation@tfl.gov.uk

Dear Sir / Madam,

RE: LEWISHAM LOCAL PLAN REGULATION PROPOSED SUBMISSION DOCUMENT 2022 (REGULATION 19) CONSULTATION

Thank you for providing the opportunity to comment on the Local Plan regulation 19 consultation.

Please note that our representations below are the views of the TTLP planning team (previously known as TfL Commercial Development (CD)) in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

Transport Trading Limited Properties Limited (TTLP)

TfL owns around 5,700 acres of land across London and some of the surrounding boroughs, including buildings, land attached to tube, railway and bus stations, highways and worksites. TfL has set up a dedicated commercial property company, Transport Trading Limited Properties Limited (TTLP), to deliver housing in high demand areas and provide an increased revenue stream, and also to manage its commercial estate and undertake other development projects.

TTLP is a significant landowner in the Borough. Our projects are driven by optimising housing delivery in sustainable locations within developments which are sensitive to their context and communities, and which build on our legacy of design excellence. Key deliverables include 50% affordable housing across our London-wide portfolio of publicly-owned land and the enhancement of public transport infrastructure. Many of our sites are located next to busy transport hubs and our projects play a vital role in meeting London's priorities to build affordable homes, create healthy streets and neighbourhoods, improve air quality, encourage sustainable travel choices, provide transport infrastructure improvements (such as step-free access and better public realm), and support small and independent businesses. We do all this while also generating vital revenue to reinvest in improving London's transport network.

MAYOR OF LONDON

TfL is a significant landowner in the borough and the council has included TfL land in a number of site allocations including:

- Lewisham Gateway
- Land at Conington Road and Lewisham Road
- Thurston Road Bus Station
- Catford Island
- Sainsburys Local and West of Grove Park Station.

Additionally, since our response to the Call for Sites consultation (2018) and Regulation 18 Issues and Options Consultation (2021) we have identified two further sites in the borough which may be suitable for industrial and residential development to help meet the policy objectives set out in the draft Local Plan. These are:

- Silwood Triangle, which is part of the Surrey Canal Road SIL (please see description and map in appendix 1)
- Oldfield Grove, which is within the Lewisham, Catford and New Cross Opportunity Area (please see description and map in appendix 2)

TTLP have also prepared a 'Sustainable Development Framework' (SDF)I which consists of 120 Key Performance Indicators (KPIs) to monitor and grade the sustainability of TTLP's development schemes, ensuring that good practice is achieved as far as possible.

We previously responded (as TfL Commercial Development) to the Call for Sites (October 2018) and the Local Plan Main Issues and Preferred Approaches (9 April 2021). Our current representations should be read alongside our previous responses.

Consultation Response

OLI Delivering an Open Lewisham

TTLP supports Policy OLI criterion A.(C) which aims to direct growth in existing centres. To be positively prepared, the policy should also promote growth in areas which have high transport connectivity but are outside of the identified local centres. This would ensure compliance with London Plan policies GGI and HI which aim to direct growth to locations which have the high public transport connectivity.

QD6 Optimising Site Capacity

It is welcome that criterion B. identifies that Public Transport Accessibility Levels (PTAL) are key in establishing optimised densities for development sites. To be positively prepared, the policy could go further to identify that areas with the highest PTALs ratings in the borough are likely to be the most suitable areas for higher density development.

HO3 Genuinely Affordable Housing

The policies commitment to support the delivery of affordable housing on public land is supported. However, as drafted, the policy is not in line with London Plan Policy H4 (part A paragraph 4) which states that some public landowners have agreements with the Mayor which supports the delivery of “50 per cent affordable housing across their portfolio.” This is further explained in London Plan supporting paragraph 4.4.7 which identifies that public sector landowners with an agreement with the Mayor may provide 50% affordable housing across a portfolio of sites, provided at least 35% affordable housing is provided on each site, with the required affordable housing tenure split on the initial 35%.

TfL has a portfolio agreement with the Mayor to deliver 50% affordable housing on TfL development sites across London, and to be consistent with London Plan Policy H4, the draft policy should be amended to recognise public landowners who have a portfolio agreement with the Mayor.

TR1 Sustainable Transport and Movement

TTLP broadly supports this policy. However, it is suggested that criterion A should include that development proposals must consider Public Transport Access Levels (PTAL) to optimise the capacity of sites.

EC9 Railway Arches

TTLP supports the principle that a range of uses are acceptable in arches. There are particular opportunities for arches to contribute to town centres and provide tertiary low-cost business space which is suitable for a range of uses in line with London Plan supporting paragraph 6.2.4. We look forward to working with the borough to increase uses in railway arches managed by TTLP.

Lewisham’s Neighbourhoods and Places

Central Area

TTLP is supportive of the policy objectives for the central area.

Site Allocations

1. Lewisham Gateway

TfL has significant landholdings within this site allocation and TTLP is supportive of this allocation.

5. Land at Conington Road and Lewisham Road (Tesco)

There is existing bus infrastructure on this site. The recognition that this needs to be relocated or retained as part of development is welcome. Any proposed plans relating to the bus infrastructure should be prepared in consultation with relevant TfL operational teams.

6. Thurston Road Bus Station

TTLP is supportive of the use of this site for strategic infrastructure including as a work site/station box for the Bakerloo Line Extension. However, for the plan to be positively prepared there is an opportunity to explore future residential led development adjacent to or above the transport infrastructure that is coming forward on this site and this could be recognised in the site allocation. We also strongly recommend that the local plan identifies and commits to potential alternative sites which could accommodate a future bus stand within the locality of the Gateway. The existing bus services are relied upon and primarily used by Lewisham residents for travel to work, for shopping and for other needs in the borough and must be considered alongside promoting the delivery of the Bakerloo Line Extension.

18. Catford Island

TfL has land ownership on Sangley Road which is now included within this site allocation. TTLP are supportive of this allocation and the proposed road improvement schemes coming forward in the area and are willing to work with applicants and the council to bring forward development on appropriate areas of the site.

North of the Borough

TTLP have significant landholdings in this part of the borough which are suitable for being brought forward for a range of employment and residential use.

Policy LNA3 Creative Enterprise Zone

TTLP is supportive of this policy. TfL own significant operational rail land in the north of the borough area and portions of this land may be suitable for redevelopment for a mix of creative employment uses in line with this policy. Since responding to the call for sites consultation in 2018 and the issues and options consultation in 2021, TfL has identified a site in Silwood Triangle (please see site map in appendix 1). This site has draft designations as a Strategic Industrial Location as well as being within the creative enterprise zone and TfL is keen to work with the borough to explore providing industrial uses on this site.

A further in the north of the borough, which has also been identified since the response to the 2018 call for sites and 2021 issues and options consultation, may be suitable for residential led development is Oldfield Grove (Please see the map in appendix 2). This site is currently operational land and further feasibility work to understand the scope of the opportunity needs to be undertaken.

East of the Borough

8 Sainsbury Local and West of Grove Park Station

TfL owns a bus stand within this site allocation. TTLP is supportive of the allocation in principal but agrees that any applicants should consult with Transport for London to investigate future options for the bus stand, including the continued operational function of either the existing, or re-provided, bus facility, which the site masterplan should address.

Policies Map

TTLP are supportive of the proposed changes to the policies map.

Conclusion

We hope that these representations are helpful but if you need any further information or would like to discuss any of the points raised in our representations, please do not hesitate to contact me. We look forward to being kept up to date with your programme going forwards.

Yours faithfully / sincerely

Christian Gonito
Planning and Development Assistant
TTL Properties Limited, Transport for London

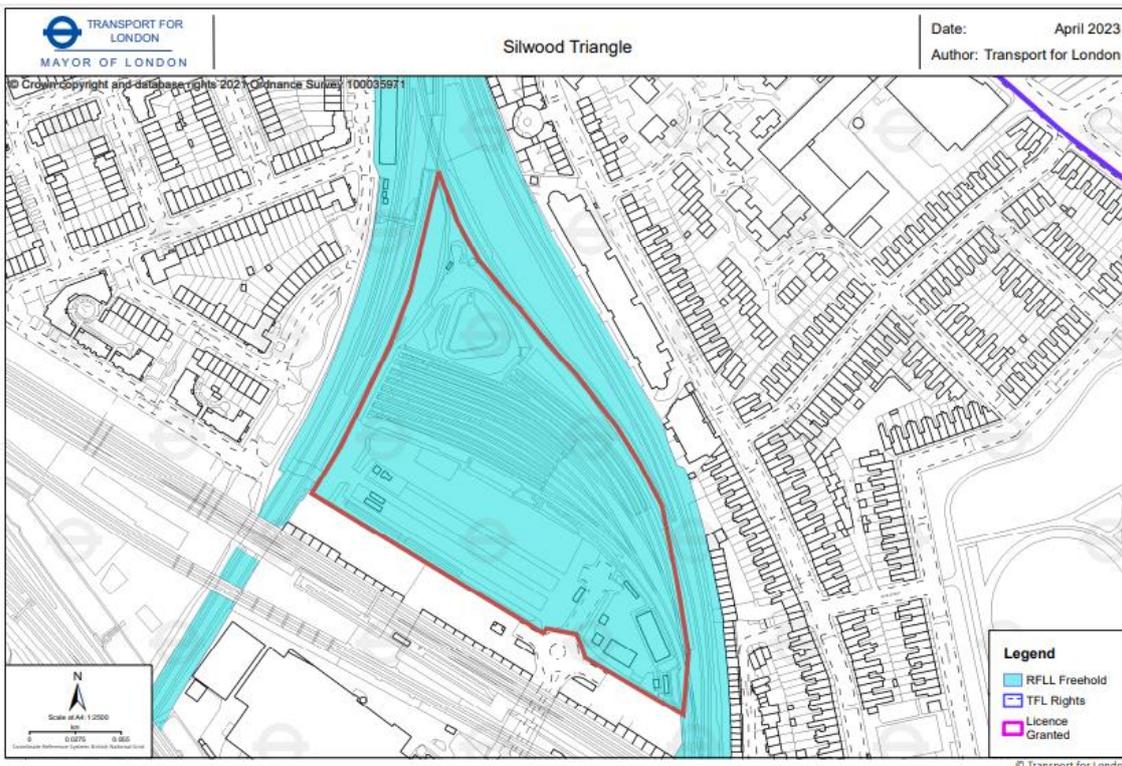
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Luke Burroughs, Principle Commercial Planner, TTL Properties Limited, Transport for London

Appendix I

The Silwood Triangle site (SE14 5RL) is part of the Surrey Canal Road SIL and has good prospects for the development and intensification of industrial, storage, transport, utilities and other employment-type uses.

The triangular shaped site is located in between two Overground lines coming from Peckham and New Cross that bound the site to the west and east. The two lines converge into one line which continues north to Surrey Quays. A Network Rail line and the Gemini Project business estate bound the site to the south. The site is currently being used primarily as a train depot (Deptford train depot) for stabling. To the south of the depot is a yard which is used for utility purposes in order to service the trainlines which surround the site. The site also comprises some vacant land north of the depot which is sparsely vegetated with some mature trees located along the eastern overground line.



Appendix 2

The Oldfield Grove site (SE16 2NZ) is within the Lewisham, Catford and New Cross Opportunity Area and an established residential area, and has good prospects for housing development, providing that any impacts from existing noise and other nuisance-generating activities or uses on the adjacent SIL can be mitigated.

The rectangular shaped site is located on the east side of Oldfield Grove, between the Silwood housing estate and the TfL overground line which travels north – south through Lewisham. The site is currently occupied by a two-storey building which is used as an infrastructure maintenance facility for the East London Line. This facility is likely to be relocated elsewhere in the borough. There is also a small yard to the south of the building which is used as storage for the maintenance of the railway and also comprises a substation and a tunnel which runs under the adjacent railway line. Access to the site is from Oldfield Grove.

