

Lewisham Local Plan

Regulation 18 Consultation Statement

Appendix 1 Regulation 18 Draft Local Plan Consultation Publicity

July 2022

LONDON BOROUGH OF LEWISHAM
Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Planning)
(England) Regulations 2012

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

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

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

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

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

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

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

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

Email: localplan@lewisham.gov.uk

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

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



Lewisham

Future plans

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

What is a Local Plan?

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

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

A vision for Lewisham
Lewisham will continue to be a welcoming place where people of all ages and cultural backgrounds live and thrive. A place that people

want to visit and live in, where they choose to stay and enjoy a good quality of life.

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

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

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

Catford's revival

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

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



Artist drawings of the regeneration of Catford town centre

Find out more

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

Lewisham's new Local Plan

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

About the Lewisham Local Plan

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

What is a Site Allocation?

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

Proposed site: Ladywell Play Tower



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

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

Indicative development capacity:

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

When will this happen?

As part of this consultation, we seek to understand:

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

Have your say:

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

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

Comments may also be provided by:

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



Planning Service
Laurence House
Catford
London SE6 4RU

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

date 18/02/21
our reference
your reference

Dear Sir / Madam

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

Lewisham's Central Area 2: Lewisham Shopping Centre

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

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

About the Local Plan

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

A new Local Plan for Lewisham

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

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



Why are we consulting?

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

We have prepared the Local Plan: Main Issues and Preferred

Approaches document for public consultation. It has been informed by previous consultation and engagement exercises we have undertaken for the new plan. This includes the initial statutory public consultation in 2015, Call for Sites exercises and engagement on evidence base documents.

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

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

Have your say

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

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

Email - localplan@lewisham.gov.uk

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

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

What happens next?

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

Further information on the plan process is set out in the adopted [Local Development Scheme](#).

Kind Regards

Lewisham Planning Policy Team



Planning Service
Laurence House
Gatford
London SE6 4RU

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

date: 16/02/21
ref: reference
your reference

GNANASAMBANDER NANDAKUMAR
95 Brunswick Quay
London
SE16 7PX

Dear Sir / Madam

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Why are we consulting?

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

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

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Have your say

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

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Further information on the plan process is set out in the adopted [Local Development Scheme](#).

Kind Regards

Lewisham Planning Policy Team

Dear Consultee,

Share your views on Lewisham's new Local Plan

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

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

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

Why do we need a new Local Plan?

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

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

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

Why are we consulting?

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

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

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

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

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

Call for sites

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

Have your say

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

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

Email - localplan@lewisham.gov.uk

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

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

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

Further information on the plan process is set out in the adopted [Local Development Scheme](#).

Kind Regards

Lewisham Planning



Dear consultee,

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

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

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

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

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

<https://lewishamlocalplan.commonplace.is/> and

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

Evidence base documents

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

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

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

Kind regards

Lewisham Planning



Have your say on Lewisham's Local Plan

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

We want to hear your thoughts on the opportunities and challenges across the borough and in your area.

[Have your say](#)[About the Local Plan](#)[Have your say](#)

Get your family, friends and neighbours involved

We want everyone with an interest in Lewisham to have their say on the new Local Plan. The more people involved, the better the aspirations of our diverse communities will be reflected.

Share the project with people you know.

[Share on WhatsApp](#)[Share on Facebook](#)[Share on Twitter](#)[Share via email](#)

Project initiated and information supplied by
Lewisham Council

Contact the project team



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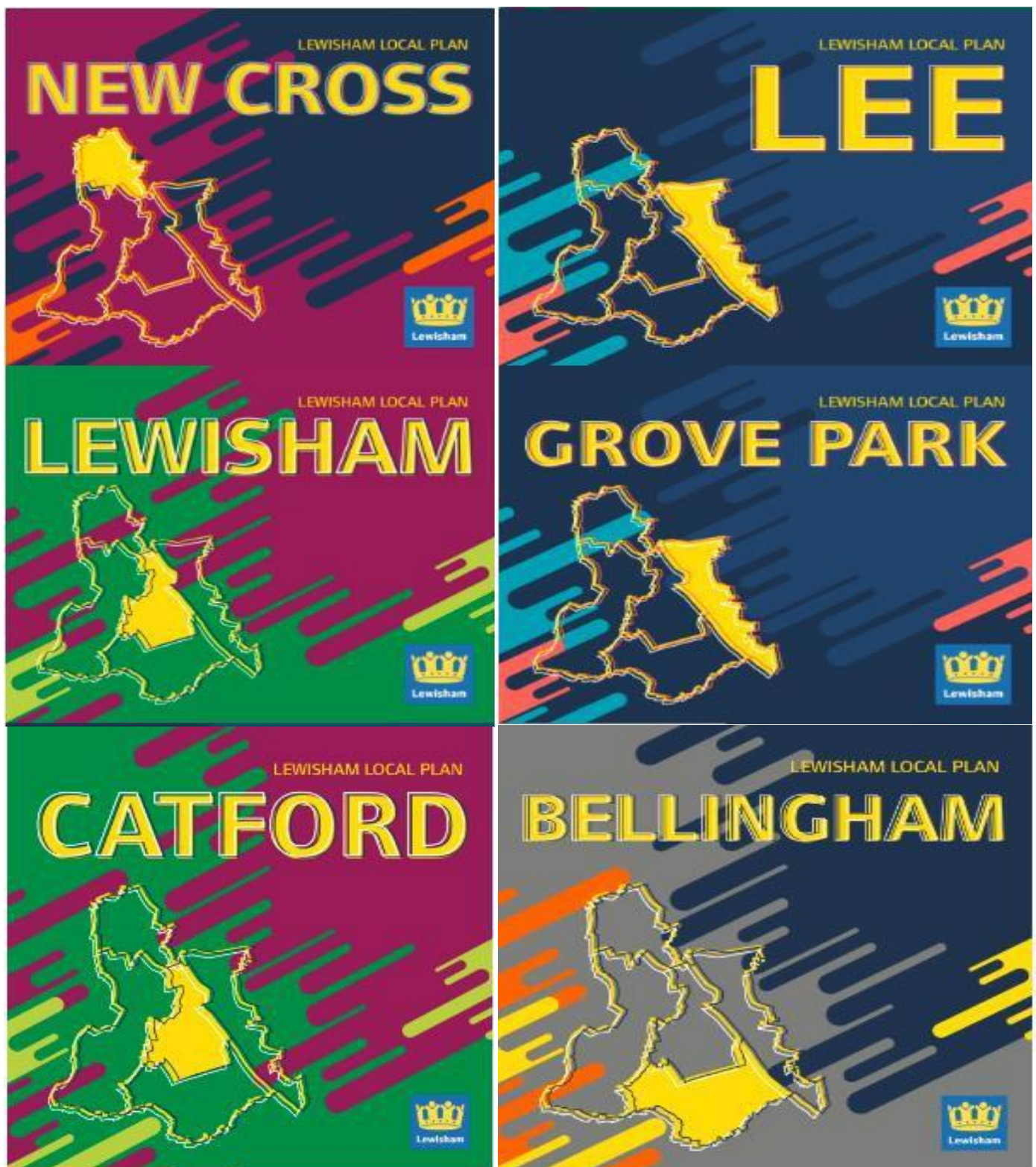
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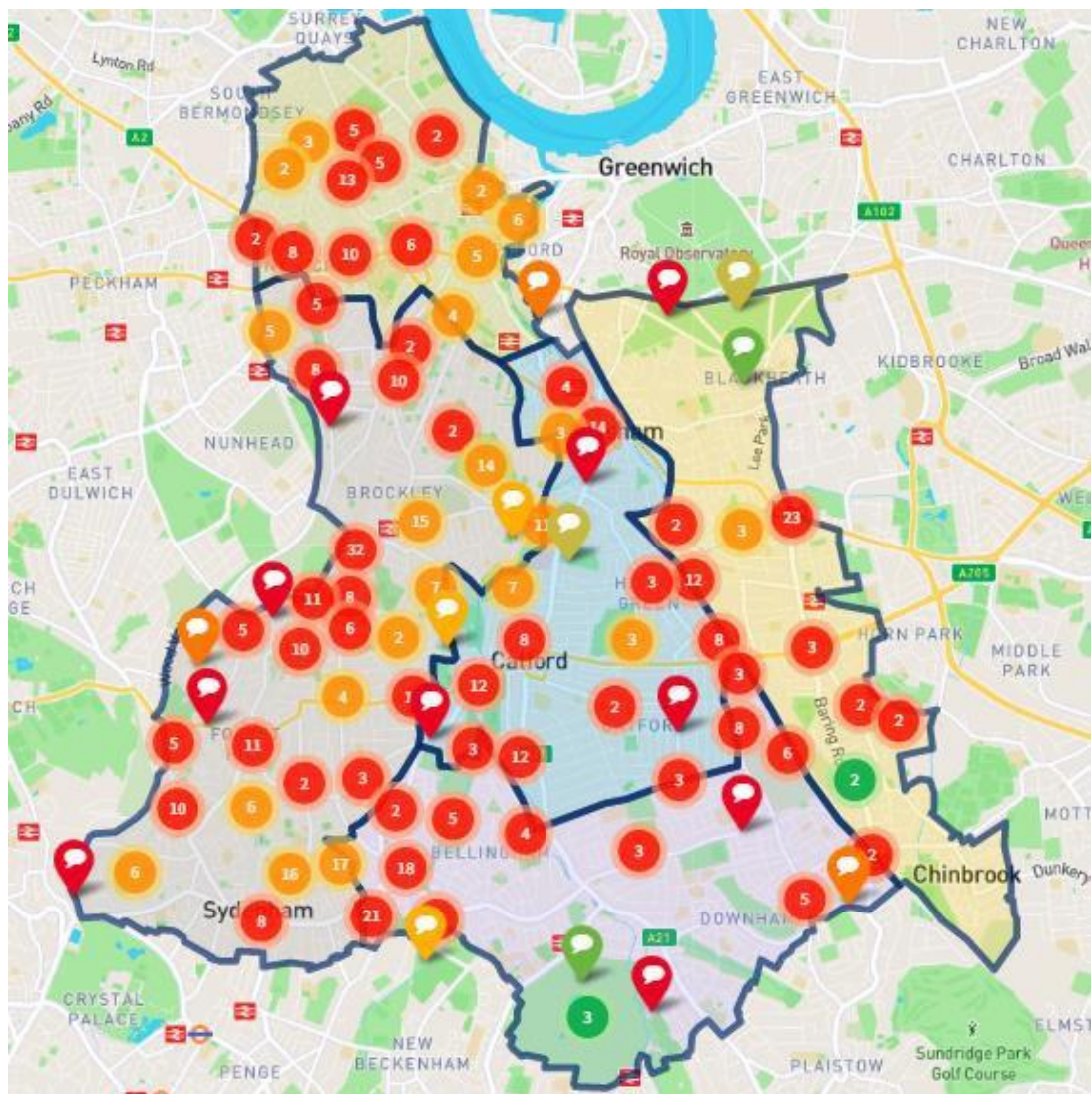
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Examples of virtual postcards used to promote area specific policies



Commonplace “Heat Map” used for informal location based submissions



Lewisham Council @Lewisham... · 28 Feb ·

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



4 2



Lewisham Council @Lewisham... · 14 Feb ·

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



3 7 6



Lewisham Council @Lewisham... · 31 Jan ·

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



2 3 2



Lewisham Council @Lewisham... · 23 Jan ·

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



2 15 14



Lewisham Council @Lewisham... · 19 Jan ·

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



1 3



Lewisham Council @Lewisham... · 15 Jan ·

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



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Lewisham Local Plan

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Local Plan - West Area online zoom session

34 views • 1 year ago



Local Plan - East Area online zoom session

17 views • 1 year ago



Local Plan - North Area online zoom session

20 views • 1 year ago



Recordings of Local Plan consultation Zoom sessions to Youtube

Lewisham Council asks for views on draft local plans

23rd February 2021

Lewisham Local Plan: East

6th March 2021



Lewisham's draft local plan: Central

21st March 2021



Local plan: Lewisham's vision for the south

13th March 2021



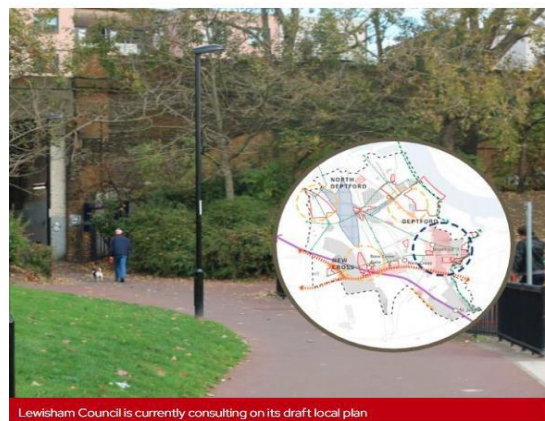
Lewisham draft local plan: West

21st February 2021



Local Plan: Lewisham's vision for north

27th February 2021



Website links to Newshopper articles promoting Local Plan consultation

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

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

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

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

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

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



[Home](#) [Find Activities](#) [We Asked, You Said, We Did](#)

Consultation on the Lewisham Local Plan - Main Issues and Preferred Approaches

Overview

Share your views on Lewisham's new Local Plan

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

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

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

Closes 11 Apr 2021

Opened 15 Jan 2021

Contact

020 8314 6000

Localplan@lewisham.gov.uk

Notification of consultation on Lewisham Council's Citizen Space

Link to notification of consultation on Citizen Space:

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

[Home](#) [Find Activities](#) [We Asked, You Said, We Did](#)

Registration for Local Plan Online Events

Overview

A series of online sessions about the Local Plan have been organised as follows:

- Thursday 4th February, 5.30pm - 7pm, Vision and Strategy
- Tuesday 9th February, 5.30pm - 7pm, Design and Heritage
- Thursday 11th February, 5.30pm - 7pm, Economy and Culture
- Tuesday 16th February, 5.30pm - 7pm, Green Infrastructure and Environmental Sustainability
- Wednesday 17th February, 5.30pm - 7pm, Housing
- Tuesday 23rd February, 5.30pm - 7pm, Infrastructure (Community/Transport)
- Monday 1st March, 5.30pm - 7pm, Central Area (1st session)
- Tuesday 2nd March, 5.30pm - 7pm, North Area (1st session)

Closes 22 Mar 2021

Opened 15 Jan 2021

Contact

020 8314 6000

Localplan@lewisham.gov.uk

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

Link to registration page for Local Plan Zoom sessions :

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

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Current and future consultations

Find out more about consultation events.

Last year, during the COVID-19 restrictions, over 1,400 people joined a borough-wide digital consultation to help inform Lewisham Council's new Local Plan, which will shape Lewisham to 2040.

Not everyone could join us digitally and now we want to hear from those who don't usually share their views with the Council.

Following COVID-19, many people feel more connected to their local area and we're starting a conversation to identify themes relevant to the Local Plan.

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

Link to Council webpage that promoted the Local Plan consultation:

<https://lewisham.gov.uk/my services/planning/policy/planning/current-and-future-consultations>

Lewisham Local Plan

Regulation 18 consultation statement

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

September 2022

Organisation (if relevant)	Part	Section, policy or paragraph	Comment	Council officer response	Action
	-	-	I object to the permanent loss of the drying area, and green space, these are needed for our health and wellbeing. I am also concerned about the loss of emergency access to the back of the flats, we use it in good weather. The loss of the parking space would be a problem for me and others at my age, 75 years old.	This response seems to relate to a specific planning application and not the Local Plan consultation. Members of the public will be able to comment on specific applications through the Development Management process.	No change.
	-	-	I enthusiastically support the proposed house building for this site and am very much against the mimbyism of some of my neighbours I'm respect of this. My concerns about the proposals are regarding the conservation of the over one dozen mature trees that line the inner perimeter of the site. They constitute a substantial and valuable amenity and in my opinion must be conserved to ensure the visual and general environmental impact of this prominent hill top position. I trust you will have full regard to this issue in the design of these new builds and especially during their construction. Is it possible to have Tree Protection Orders applied to these trees	This response seems to relate to a specific planning application and not the Local Plan consultation. Members of the public will be able to comment on specific applications through the Development Management process.	No change.
	-	-	<p>There are several reasons why I do not agree with our estate being built on.</p> <ol style="list-style-type: none"> 1. We do not have much amenity land on which to build and will cause being overlooked. 2. It will cause problems with car parking having to be in the road (Longton Grove) plus where are emergency services going to park if called out. 3. Access to adjoining estate (which is our right of way to buses and shops in Wells Park Road) not everyone has a car, will be non-existent 4. Doing away with drying areas means there will only be 1 left under block 1-12 <p>Our grassed area in the middle of the estate will not be available to sit out on during better weather. The main driveway and road into Markwell Close badly needs resurfacing. Would be nice to see the estate have some bulbs put in where artificial cherry trees were before Council chopped them down!</p> <p>I know the inconvenience and noise that can be caused as I was here when Wells Park estate and Longton Grove/Avenue were built.</p> <p>There must be bigger areas in Lewisham to build on instead of overcrowding our small one.</p>	This response seems to relate to a specific planning application and not the Local Plan consultation. Members of the public will be able to comment on specific applications through the Development Management process.	No change.
NHS Property Services	-	Call for sites	<p>South Lewisham Health Centre</p> <p>South Lewisham Health Centre comprises a building which operates for health care purposes. This accommodates 1,264 sqm (GEA) of Class E (formerly D1) health centre floorspace, formed over two storeys, including a glazed roof atrium/reception area. The site occupies a regular sized plot extending to 0.25ha. The topography on the site is generally flat and the existing building is of no architectural merit.</p> <p>Unlike Jenner Health Centre, South Lewisham Health Centre is not included within the draft Local Plan as a proposed allocation, despite being submitted as part of the 2018 Call for Sites exercise by NHSPS. NHSPS would therefore seek to re-promote South Lewisham Health Centre as suitable, available and achievable in development terms.</p>	Noted. The Council invited to the public to submit additional sites for consideration as part of the Regulation 18 consultation. However it has been decided that additional sites will not be considered for inclusion as site allocations. This is because the public would not have an opportunity to appropriately comment on the proposals for	No change.

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

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

				including by addressing areas of deficiency in provision.	
	-	General	<p>There are some positive ideas in the document that I hope can be followed through on. These are;</p> <ul style="list-style-type: none"> - The preservation of the Bakerloo Line Extension – this is an important element for the future of Lewisham and South East. Making east transport links - Cycle rout 1 and the pedestrian routes around North Lewisham making a better environment for people to travel about. The building of a pedestrian bridge over the railway at New Cross Gate would be a huge benefit for the local community, linking New Cross gate to Fordham Park. - Traffic calming is always a positive as long as it’s not at the expense of local streets. <p>Enhancement of Green Space</p>	Support noted.	No change.
	-	General	<p>If the Council genuinely wanted to encourage the involvement of residents (by definition, non-specialists) in the planning process it would make a real effort to publish material in plain English and eliminate repetition. It is disappointing that it has failed to do so.</p> <p>Rather than planning for homes that will help meet the problems of tomorrow, the document exudes complacency. It refers to a “strong record of housing delivery in Lewisham” based entirely on meeting national targets that have no reference to local needs.</p> <p>While meeting the “Decent Homes” standard for the majority of public sector households is good news, it should be noted that this is a very low benchmark. This level of complacency suggests there will be no change to current practices which is in itself a concern.</p> <p>The document makes barely any mention of sustainable development or housing with just one reference to climate change or the climate crisis. It may be that the likely continuation of home working is too recent a concept for this document but it is something that needs to be reflected in the final plan. We cannot carry on building rabbit hutches - the smallest homes in Europe. Meeting the minimum standard is not good enough.</p>	<p>The preparation of the Local Plan is being carried out in accordance with the Council’s adopted Statement of Community Involvement. The draft Local Plan was informed through formal public consultation along with early stage engagement with the public, including on key evidence base documents, such as the Characterisation Study, New Cross Area Framework and Catford Town Centre Framework. A Summary Version of the Local Plan consultation document was also prepared.</p> <p>The Local Plan sets out a positive strategy for managing future growth and development across the borough, consistent with the Good Growth policies set out in the London Plan, and the principles of sustainable development set out in national planning policy.</p>	The Local Plan has been reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan has also been prepared.
	-	General	<ul style="list-style-type: none"> - I am writing this email because the consultation process using Commonplace is badly designed – it uses terms without clear definition, it asks for residents to simplify all responses to coloured faces and at the same time presents a complex array of proposals, statements, visions, objectives and principles. 	<p>Noted. The preparation of the Local Plan is being carried out in accordance with the Council’s adopted Statement of Community Involvement.</p> <p>The Commonplace website provides multiple tools / opportunities for the public to have their say. This includes sliding scales (for approval or disapproval), comment boxes for detailed written comments, and an interactive map. Responses can also be sent by email or letter.</p>	No change.

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

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

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

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

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

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

		<p>There was a desperate lack of appreciation for all the old buildings which were too readily bulldozed and replaced with cheap and nasty flats which in turn created massive social problems in virtually every corner of the borough.</p> <p>Old pictures of every high street in the borough are readily available and you look now and it looks like they've almost been deliberately trashed. Almost everything from shop fronts, buildings, lampposts, roads and kerbs, bins, just everything has just led to once beautiful and proud streets turning into a complete eyesore. The council planning dept. should take responsibility for all of that frankly. It's as if they don't care about the look of the place and the way communities were broken up and areas replaced with the construction of vast featureless flats was a major mistake.</p> <p>The documentary 'the secret history of our streets 'on the BBC focusing on Deptford high street said it well and the one street that didn't get bulldozed, Albury is now full of Million pound homes. Lewisham council bulldozed street after street of homes like that and replaced them with concrete ghetto's. I think we all deserve an apology frankly.</p> <p>That was replicated all over the borough, find me a high st that looks better today than it did 100 years ago and frankly anything anywhere in the borough. Lewisham council has frankly trashed the place when with proper planning and using the powers at its disposal it could have done so much better.</p> <p>I know the population has expanded massively and again facilities have not kept up with the expanding population. If you build 24 000 new homes you need 24000 of lots of other things too. Schools, hospitals, doctor's surgeries and all the other essential services.</p> <p>You also need to think about roads. Lewisham idea of catering for the parking needs of its population is to make it so difficult to park and drive around the place that people get sick of having a car but that doesn't improve people's lives one iota. The roads in Lewisham are desperately congested so if lots of new homes are not going to be populated by car less people, what provision will there be?</p> <p>It seems to me that generally Lewisham council provides nothing with all its new housing and just lets motorists just have a harder and harder time.</p> <p>When you look at how life used to be in this borough, I think we need to look back frankly. So many beautiful buildings have been lost but could be built again. Houses and blocks could be built with the same decorative features around the windows and doors as all the others, how is it allowed that they are not????</p> <p>Lewisham council has ok'd so many diabolical developments and also the bulldozing of so much beauty. It really is quite upsetting when you look at pictures of how the place did look and should still look.</p> <p>I go to Italy quite a lot where they preserve all their old buildings and architecture. If people had done what the Lewisham council planning dept. had done over there, they'd all be arrested frankly for desecration.</p> <p>Anyway with a long term plan now being created please try and do the following.</p> <p>- Preserve the old buildings and only grant planning permission for developments that are appropriate for a street or an area.</p>	<p>principles of sustainable development set out in national planning policy.</p> <p>The Local Plan broadly advocates and seek to deliver character-led growth, ensuring new developments respond positively to the historic, social/cultural, built and environmental character of Lewisham.</p> <p>The Local Plan is supported by an up-to date Infrastructure Delivery Plan. This helps to ensure that appropriate provision is made to support the proposed growth sets out in the local plan.</p> <p>Noted. The photos included in the draft Local Plan are provided for illustrative purposes only and do not carry material weight for planning decisions. As the plan is progressed through the next stages of the process, the Council may take the opportunity to update these, subject to resources available.</p>	
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	-	General	<p>The Local Plan must</p> <ul style="list-style-type: none"> • Ensure robust delivery of improved air quality and steps to actively reduce (not just slow the growth of) traffic levels, traffic congestion and pollution caused by traffic that impacts on local residents, particularly children. Priority should be given to low carbon and public transport modes promoting health through walking and cycling along safe routes. Any developments must offset any additional carbon they generate so there is no increase in the carbon emissions generated in the borough.. • Be robust in protecting local heritage and neighbourhood character so buildings are at a scale similar to the buildings in their vicinity and buildings on a human scale. • Protect and enhance existing green space including parks, cemeteries and nature reserves. • Deliver homes that people need, not what developers want to provide and reduce dependence on the private rented sector by improving access to homes people can afford. • Take account of how travel demand is likely to change following the Covid-19 pandemic as it is likely that fewer residents will travel to work in zone 1 each day accepting that the level of this change is not known at the current time • Encourage quality, sustainable jobs and apprenticeships rather than insecure "gig economy", zero hour jobs. • Not promote fast food or bookmakers' or similar gambling premises. 	<p>Noted. The Local Plan sets a vision and objectives for the Borough that are aligned with the principles of sustainable development in national planning policy and the Good Growth policies of the London Plan. It provides a framework to enable modal shift and improve air quality, in the context of the London Mayor's objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. This is embedded in the Healthy Streets policies set out in Part 2 Transport and Connectivity section.</p> <p>The Local Plan provides a policy framework to address climate change issues across the borough, in line with the London Plan policies. For example, Part 2 Policies on Sustainable Design and Infrastructure.</p>	No change.

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

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

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

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

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

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

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

	-	General	<ul style="list-style-type: none"> • I have concerns about “support” of development rather than preventing bad development. • There issues with general vague wording and conflicting policies = developers charter. • Lack of emphasis on green space provision is a major oversight. • Transport policy and shopping policies need a major rethink. • Infill development generally (esp. at corner sites) <p>Article 4 directions.</p>	<p>The National Planning Policy Framework requires that Local Plans must set a positive framework for managing growth and development to meet identified local needs. The Council considers that the draft plan has been prepared in line with the NPPF.</p> <p>The Local Plan includes a dedicated section on Green Infrastructure, including policies which support the protection and enhancement of green and open spaces.</p> <p>The setting of Article 4 Directions are outside the scope of the Local Plan.</p>	Local Plan amended to provide more authoritative language where possible. For example, by stating that development proposals “must” rather than “we expect” or “should” or “will be expected to”.
	-	General	I have listed my objections above to the Lewisham 2021 plan and need my objections officially noted.	Noted.	No change.
	-	General	<p>5 - Adoption of more ambitious and authoritative language.</p> <p>Though the sentiment of the plan is ambitious, it is undermined by consistently weak and ambiguous language, leaving far too much open for negotiation by developers whose priority will always be profit. If the plan is to genuinely work for the people of Lewisham, it must be revised to be more precise and definitive.</p>	The National Planning Policy Framework requires that Local Plans must set a positive framework for managing growth and development to meet identified local needs. The Council considers that the draft plan has been prepared in line with the NPPF.	Local Plan amended to provide more authoritative language where possible. For example, by stating that development proposals “must” rather than “we expect” or “should” or “will be expected to”.
Blackheath Society no 2	-	General	<p>Executive Summary</p> <p>Introduction</p> <ul style="list-style-type: none"> • Welcome comprehensive, consolidated single document • Welcome aspirations underpinning and driving draft policies • Salute efforts to create evidence base, inform and consult citizens (especially in difficult covid times) <p>But</p> <ul style="list-style-type: none"> • Too long and wordy (longer than new London Plan) and difficult to navigate. Poor cross-referencing. • Vision(s) and route(s) to it/them not sufficiently granular, specific and differentiated for Lewisham as a borough and for its unique character neighbourhoods (at least down to District town centres) • Too little time for consultation on current draft and subsequently (especially in difficult covid times) • No effort to value and reach out to amenity societies, who have great experience and local knowledge <p>▪</p>	<p>Noted. The Regulation 18 consultation was carried out in accordance with the Council’s adopted Statement of Community Involvement. The consultation period was well in excess of the legal minimum 6-week period.</p> <p>The length of the draft plan reflects that it will update and consolidate 4 adopted plans into a single document.</p> <p>Local community groups, including neighbourhood forums and amenity societies were invited to submit representations on the local plan, and a number of key evidence base documents informing the plan (such as the Lewisham Characterisation Study).</p>	No change.

				The Council considers that the approach to the sub-areas of character areas (Part 3) provides a proportionate and more granular approach to planning at the local level. The consultation provides opportunities for the public to comment on and inform the sub-area visions and policies.	
Blackheath Society no 2	-	General	<p>What is not included</p> <ul style="list-style-type: none"> • Lack of guidance on weightings/priorities where there is conflict or trade-off between policies • Lack of clear idea of Lewisham's housing needs and priorities, independent of the London Mayor's • Lack of transparency, honesty and realism about what is within LBL's gift/control • Lack of baselines, milestones, measurable and granular articulation of vision (for Borough and for major neighbourhoods) and road map to it • Lack of detailed proposals in DM1 for engaging citizens, local communities and community groups (especially amenity societies) and involving them in delivering, monitoring, reviewing progress on the Plan • Lack of mechanism/timeline for flexing and adapting the Plan to their stakeholder views and a changing world (including population growth/movement), especially post covid and Brexit • Lack of detail on district centres, their benefits and requirements, and how they differ e.g. need a District Centre SPD or separate ones for each, including Blackheath and Lee Green, as masterplans for such areas <p>▪</p>	<p>Noted. Part 1 of the Local Plan sets out that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise, in line with planning law. This will be considered on a case by case basis.</p> <p>The Local Plan has been informed by technical evidence which sets out Lewisham's housing needs, such as the Strategic Housing Market Assessment. The plan's policies seek to respond to these needs, whilst also seeking to deliver on the borough's London Plan housing target.</p> <p>Part 4 of the Local Plan sets out the framework for monitoring the delivery of the plan over the plan period.</p> <p>Part 4 Policy DM1 of the draft Local Plan makes clear that a wide range of stakeholders, including community groups, will help to support the delivery of the plan.</p> <p>The Council is required to review the Local Plan every 5 years. The Council also reports on progress in the delivery of the plan annually through the Authority Monitoring Review process. Monitoring will be used to inform any necessary changes to the plan.</p> <p>Part 2 of the Local Plan on Economy and Culture sets out the town centre hierarchy and makes</p>	Local Plan Part 4 Policy DM1 supporting text amended to include additional information on delivery of the plan.

				clear the role/function of different centres within it. The level of policy detail for each of the District Centres is considered proportionate for a strategic document. Policies are included in Part 2 and 3 of the plan.	
Blackheath Society no 2	-	General	<ul style="list-style-type: none"> • Very thorough and comprehensive. Maps closely on to London Plan. Good evidence base (e.g. Character Study 2019, Open Spaces Assessment (2019), New Cross Area Framework, Catford Town Centre Master Plan); IDP (Infrastructure Development Plan) • Good attempts to consult (e.g. 2015 Review, Characterisation Study 2019; calls for sites 2015, 2016, 2018; 2021 draft, online workshops), though time for consultation on this draft is too short given its length and the constraints of the pandemic • Useful consolidating lots of separate development documents into one • Good general aspirations, difficult to disagree with; but lack of real vision, for Borough and neighbourhoods, with clear milestones to ultimate Vision in 2040 <p>Interesting and useful background analysis and new policy ideas (e.g. on height)</p>	Noted.	No change.
Blackheath Society no 2	-	General	<ul style="list-style-type: none"> • Much too long, and often repetitive, especially in Policies and Explanations • Short (31-page), accessible summary useful but bland. Need practical summary of just a short vision and good 'strap line', then detailed policies and annexes • Some individual Development Management Policies (Part Two) rather long • Too much focus on uncontrollable aspirations and not enough on practical, achievable deliverables (as required by NPPF) • No recognition or explanation of how irreconcilable aspirations and policies are to be resolved, weighted or prioritised when they clash <p>Why such long timescale (2020-40) and what about milestones (5 yearly) and reviews, evaluations and updates to adapt flexibly to a changing world?</p>	<p>Noted. The level of detail included in the plan is in part a response to feedback from local community groups who requested that the new Local Plan provide more detailed policies and guidance on selected policy topic and neighbourhood areas. However it is acknowledged parts of the plan are repetitive and could be made more concise.</p> <p>The Summary Document was prepared to support the Local Plan consultation and provides a broad overview of the main issues and policy proposals.</p> <p>The NPPF requires to Local Plan to cover a minimum 15 year period from adoption. The Council is required to review the Local Plan every 5 years.</p>	The Local Plan has been reviewed and updated to make it shorter and more concise, where possible. A plain-text version of the plan has also been prepared.
Brockley Society	-	General	<ul style="list-style-type: none"> • Brockley Society participated in the consultation process that helped to inform the Lewisham Characterisation Study of 2019. We offer comments now on the more expansive Draft Local Plan. This is a composite document prepared by our planning group. Part 1 is deliberately limited to key concerns affecting the operational area of Brockley Society and is therefore confined geographically to the district neighbourhood of Brockley and its hinterland as set out in Lewisham West Area (LWA of Part 3 of the Draft Local Plan). Other comments follow in Part 2 	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Brockley Society	-	General	<p>1.The Council must assess and explain the impact of Covid-19 on the proposals</p> <p>The draft makes only a very brief reference to the impact of Covid-19 on the proposals, noting its impact on the local economy and need to take into account its effects in future plans. This is not</p>	Noted. The draft Local Plan was largely prepared before the peak of the Covid-19 pandemic. Additional evidence will be prepared	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline

			<p>adequate. The proposals in the draft rest on important assumptions that must be reassessed in view of the pandemic, such as projections about overall housing need, the kind of homes required, the demand for commercial and retail premises and the priority to be attached to providing public recreation spaces.</p> <p>It would be unreasonable to adopt the plan without either reviewing these central assumptions in light of Covid-19 or least explicitly committing to review the proposals within two years. Alternatively, if the Council has already taken into account the impact of Covid-19 in preparing the draft, it must explain how it has done so and how this has affected the proposals. As things stand the draft reads as though the last 12 months have not happened, which makes it impossible for respondents to engage meaningfully with the proposals and determine whether they are appropriate or not.</p> <ul style="list-style-type: none"> For example, the draft asserts that “[m]any more new homes must be built to meet the needs of a growing population”, and follows the draft London plan in claiming a need for 16,670 net new homes over the next ten years. But it does not explain whether this projection takes into account the expected long-term increase in working from home and any resultant impact on the number and type of homes that will be needed in Lewisham. 	<p>following the Regulation 18 consultation taking account the latest information on the impact of Covid-19 and related issues</p> <p>The National Planning Policy Framework requires that development viability is considered through the plan process. A Viability Assessment has therefore been prepared as an evidence base document.</p>	<p>information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections.</p>
Brockley Society	-	General	<p>Enforcement: The weakness of Enforcement in the borough is an ongoing problem. The best policies will be irrelevant if people can just get away with breaking the rules. The Local Plan needs to include this as a key objective, including how it can be funded. Otherwise it will always be ineffective because of lack finance</p>	<p>Planning enforcement is outside the scope of the Local Plan.</p> <p>Part 4 of the Local Plan sets out the arrangements for delivery and monitoring of the Local Plan, including funding mechanisms such as Community Infrastructure Levy and planning obligations.</p>	<p>No change.</p>
Climate Action Lewisham	-	General	<p>Climate Action Lewisham is a local community group working to support and generate initiatives to reduce our collective greenhouse gas emissions and create thriving sustainable neighbourhoods in the face of the ecological crisis. We supported Lewisham borough to declare a Climate Emergency in 2019 and we have maintained a relationship with the council since then. We aim to communicate with the borough’s communities about the ecological crisis and run projects which support local people to make greener choices and contribute to their sustainable communities across Lewisham. We would love to see Lewisham become a leader in reducing carbon emissions and supporting social justice and sustainable outcomes in collaboration with its people in decades to come.</p>	<p>Noted and support welcomed. Responses to the additional representations are set out elsewhere in this Consultation Statement.</p>	<p>No change.</p>
Culverley Green Residents Association	-	General	<p>General</p> <p>Although there is much to commend in the draft plan in terms of the background research and information that has gone into its preparation we are concerned that the issues identified are not necessarily being carried forward properly into policies and actions and specific projects.</p> <p>Too much of the plan is predicated upon accommodating residential unit building to the detriment of employment, open space, traffic, transport, climate change impacts and supporting community facilities.</p> <p>We are totally aware that the Plan has to be in conformity with the London Plan and with the housing need methodology imposed by central government but the continued assumptions around ‘london has to grow at all costs’ as it is the economic driver of the country is at odds with the present government supposed initiatives to send more government departments out to the regions and to focus on the ‘left behind’ areas of the country. The plan remains based upon a predict and provide model which would appear to have shaky foundations.</p> <p>Although the Covid pandemic is mentioned, there is no mention of Brexit and the impacts of both these things on population growth or possible decline, patterns of work and how these might change,</p>	<p>Noted. The local plan seeks balance growth by ensuring that future development are aligned with the principles of sustainable development.</p> <p>The draft Local Plan was largely prepared before the peak of the Covid-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues.</p> <p>The Council is required to review its adopted Local Plan every 5 years</p>	<p>Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections</p>

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

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

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

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

				to-date, including a Strategic Flood Risk Assessment.	
Environment Agency	-	General	<p>Environmental evidence and data</p> <p>All planning policies, proposed site allocations and planning decisions need to be informed by the latest environmental data and evidence and state of the local environment to ensure new development delivers environmental improvement.</p> <ul style="list-style-type: none"> For the latest data sets such as groundwater source protection zones, flood risk zones, main river maps http://environment.data.gov.uk/ds/partners/index.jsp#/partners/login Catchment planning data https://environment.data.gov.uk/catchment-planning/ <p>We hope our response is helpful, and if you have any questions or require more information please let me know. We look forward to continuing to work in partnership with you to deliver environmental protection and enhancement across the London Borough of Lewisham.</p>	<p>Noted. The Local Plan policies have been informed by an evidence base which the Council considers is up-to-date, including a Strategic Flood Risk Assessment based on the latest EA data for water management.</p> <p>The Local Plan requires applicants to consult the EA where appropriate to ensure the latest environmental information is used to inform development proposals.</p>	No change.
Forest Hill Society	-	General	<p>Introduction</p> <p><i>“We have a once in a 100 years’ opportunity to shape the centre of Forest Hill, reflecting the needs and aspirations of people who live and work in the area.”</i></p> <p>The Forest Hill Society’s (the Society) response to the Lewisham Local Plan (LLP) stems largely from the Forest Hill Station and Town Centre Master Plan (Master Plan) created in 2016 in partnership with the Society and Forest Hill-based Discourse Architecture. This Plan focussed on the urban renewal of the town centre particularly around Forest Hill Station and embodied many of the LLP’s Strategic Objectives, particularly around economic growth and housing and are reflected in this submission.</p> <p>The Master Plan along with this submission addresses a number of themes in the LLP. A bigger vision will prevent the continuation of ad-hoc development and allow the disparate sites on both sides of the rail tracks to be knitted together into a coherent arrangement.</p> <p>Our approach to “Inclusive Neighbourhoods” focuses on accessibility issues at the station and critically other local amenities including Forest Hill Pools. We address the provision of “Housing” included above and beyond projections for the sites covered in the LLP. We also cover the ‘Thriving Economy’ focussing on investment in Forest Hill town centre to enable the creation of a new cultural quarter and area of significance for the night-time economy. This ultimately benefits the entire Borough. We also support measures to improve greening, walking and cycling, safer pedestrian crossings and Healthy Streets initiatives as well as supporting plans for consultations into LTNs in the area.</p> <p>While broadly supportive of the draft LLP, we would like to see some changes in priorities on some specific issues and these are described in the submission. We also feel some elements should be more precisely articulated all to bring a clear vision for the Forest Hill area over the next twenty years. The Master Plan fully reflects this and we would propose its key elements are fully incorporated into the LLP. A copy of the Master Plan is included with this submission.</p> <p>The Forest Hill Society</p> <p>The Forest Hill Society is a civic amenity society, formally constituted and established in May 2006 and currently has around 400 members. It set objectives to stimulate public interest and to promote civic pride in and around Forest Hill; to promote high standards of planning, architecture, sustainability and services; to secure the conservation and enhancement of amenities and features of public interest and has a policy of inclusion and equality of opportunity within the Society.</p>	<p>Noted.</p> <p>The Council acknowledges the work undertaken by the local community on the preparation of a master plan for Forest Hill. Officers have reviewed the masterplan and considered it during the preparation of the Local Plan. It is noted that the Local Plan aligns with the objectives set out in the masterplan. The Local Plan is a strategic document, and there are some locally specific initiatives or projects that may not therefore be addressed by it.</p>	No change.
Forest Hill Society	-	General	The Structure of the Response	Noted. The Council has and will continue to liaise with landowners	Local Plan site allocations updated with indicative timeframes for delivery.

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

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

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

				Officers consider that the Local Plan aligns with and supports the vision, objectives and policies in the Neighbourhood Plan.	
Historic England	-	General	<p>London Borough of Lewisham – Regulation 18 Consultation on draft Local Plan</p> <p>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.</p> <p>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).</p> <p>We note the scale of growth that the Borough has to address over the coming years, and in broad terms we consider that the draft Plan sets out a potentially successful framework for managing the impacts of this growth on the local historic environment. We note and welcome the focus throughout the Plan on the importance of future growth being character led, as well as the detail on heritage across a broad range of relevant policy areas.</p>	Noted. The Lewisham Local Plan recognises the important role of the historic environment in Lewisham and supports the conservation and enhancement of historic assets across the Borough. In addition, policies contained in the Local Plan are aligned with the NPPF paragraphs 20(b) and 185 and London Plan (HC1-HC5).	No change.
Historic England	-	General	I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.	Noted.	No change.
Hither Green West Campaign Group	-	General	<p>LEWISHAM LOCAL PLAN – HITHER GREEN WEST’S SUBMISSION</p> <p>‘Hither Green West’ campaign group is a resident-led campaign representing the interests of residents on the west side of the railway lines in Hither Green and Catford North, whose ambition is for Hither Green West to be the best place it can be. We welcome the opportunity to share our thoughts on the Lewisham Local Plan. This submission expands upon the shorter submission we made on the Commonplace website, which, unfortunately, we found too confusing and restrictive a tool to submit a detailed response. However, we note the submission we made on Commonplace received 146 ‘likes’ in only two days and more than for any other comment submitted to the Lewisham Local Plan consultation.</p>	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Hither Green West Campaign Group	-	General	We are happy to meet with you and Council officials to develop proposals for Hither Green West and be glad to assist with community engagement.	Noted. Offer of support for community engagement is appreciated and will be considered for future consultations.	No change.
Home Builders Federation	-	General	<p>We would like to submit the following comments on the draft Plan and we would like to be involved in subsequent consultations of the new Local Plan.</p> <p>Local Plan period It would be very helpful if the Council could state the plan period on the front cover. We understand from page 18 of the draft Local Plan that this is 2020-2040.</p>	<p>Noted. The HBF has been added to the consultation database and will be notified of future local plan consultations.</p> <p>The plan period is set out in Part 1 of the Local Pan.</p> <p>The adoption date will be included on the front cover, consistent with</p>	No change.

				the approach used by the London Plan.	
Home Builders Federation	-	General	<p>Lewisham Local Plan: Regulation 18: Late representation from the Home Builders Federation</p> <p>I hope you will consider this late representation from the Home Builders Federation on the draft Lewisham Local Plan Regulation 18 consultation version. James Stevens, the HBF's Director for Cities, has prepared this response and he is the lead contact for all things in relation to the Lewisham Local Plan.</p> <p>The Home Builders Federation (HBF) is the principal representative body of the house building industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational plc's, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year. Recent research by the Government has estimated that housebuilders have made a significant contribution to the nation's infrastructure, providing some £21 billion towards infrastructure of all types including affordable housing since 2005.</p>	Noted. Responses to the additional representations are set out elsewhere in this Consultation Statement.	No change.
Home Builders Federation	-	General	I hope these comments will help the Council to prepare the next iteration of the Local Plan. The HBF would be happy to speak to the Council to discuss the content of these representations further.	Noted. All comments received on the public consultation have been considered in the preparation of the Regulation 19 document.	No change.
HopCroft Neighbourhood Forum	-	General	<p>General Comments:</p> <p>Positive:</p> <ul style="list-style-type: none"> • In the introductory sections there is a recognition of the importance of green space including railway corridors and there seems to be a genuine commitment to resist development on green spaces and to safeguard trees. • There's a commitment to retaining the village/forest landscape across Brockley/Crofton Park/Forest Hill • The council say they are committed to enhancing protections of green spaces and recognising heritage sites. • Residential development areas are clearly identified and there are requirements for developers to include green and social spaces. 	Noted.	No change.
HopCroft Neighbourhood Forum	-	General	Beyond the introduction pages there are no actual plans around these protections and enhancements. Maps are unclear as designations aren't included and it is difficult to see how policies apply to different areas.	Noted. The maps included in the Local Plan were informed by the Council's evidence base, including the Open Space Assessment and SINC Review. A Policies Map will be prepared for the Regulation 19 stage consultation – the changes are currently reflected in the Changes to the Adopted Policies Map paper.	A Policies Map has been prepared to set out land-use designations and map their spatial extent.
HopCroft Neighbourhood Forum	-	General	There's still some ambiguity with respect to development decisions - what does 'exceptional circumstances' mean? Is there a criteria?	Noted. That nature of exceptional circumstances may vary on a case by case basis. However, the Local Plan will be amended to provide further clarity around criteria for considering exceptional circumstances, where possible.	Local Plan amended to provide additional clarification around criteria for exceptional circumstances, where possible.
Ladywell Society	-	General	The overriding concern is that we need to avoid a substantial increase in population density and certainly put a stop to any more high-rise development. We already have traffic jams on our roads, high pollution levels and pressure on our services and remaining open spaces. There is also a	The London Plan sets a housing target for Lewisham, which the Local Plan must seek to deliver.	No change

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

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

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

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

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

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

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

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

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

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

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

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

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

			<p>Commenting on the IDP is made difficult because much of it is out of date in terms of projects already identified, changed council policy and terminology of schemes. We will attempt to limit our comments to offer principles that should be followed.</p> <p>In relation to transport, the draft IDP identifies the potential for cycling to support the aim of increasing the proportion of journeys made by active and public transport to 82%. However, it fails to recognise that walking has a far greater potential than cycling and can be realised at far lower cost. Increasing the number of walking journeys made is the fastest, cheapest and simplest way to reach the 82% target for active travel in Lewisham – already, 12 times more journeys are made on foot than by bike so the smallest increase in walking will have the biggest impact on active travel levels.</p> <p>Funding for transport projects (CIL, s.106 and LIP3 as detailed in the IDP) should focus on equalities in an open and transparent way with any impact assessment being a genuine attempt to take a fresh look at priorities based on the protected characteristics identified in the Equality Act plus economic deprivation. All the schemes identified in the draft IDP need urgent review of their impact on people with the protected characteristics plus economic deprivation. Some of the schemes listed were agreed many years ago and should be reviewed in the light of changed societal, political, technological, legal and economic circumstances.</p> <p>Pedestrians overwhelmingly represent the protected characteristics above all other forms of movement (cycling, public transport, private vehicles, taxis, shared vehicles etc.). The particular groups that are represented in larger proportions of pedestrians are women, children, young people, old people and people economically deprived.</p> <p>Walking is the only form of transport that produces no harmful air pollution either locally or globally.</p> <p>The money spent on specifically pedestrian schemes has been poor in the past but changes in society regarding the impact of decisions made by public bodies regarding equalities issue should result in a massive shift of focus.</p>	<p>account of the latest borough-level population projections prepared by the Greater London Authority.</p> <p>The Local Plan sets out the strategic framework for the collection and spending of developer contributions, including Section 106 agreements and Community Infrastructure Levy. This is considered proportionate in scope for a development plan document. The Council may in the future review governance arrangements, taking into account the latest legislation and higher level planning policies, such as an update to the Planning Obligations SPD.</p> <p>It is noted that the Council has agreed governance arrangements for the spend of Neighbourhood Community Infrastructure Levey, which is considers to be transparent and democratic.</p>	
Metropolitan Police Service	-	IDP	<p>Requirement for a car pound</p> <p>The MPS have an infrastructure requirement for a car pound facility within Lewisham Council or surrounding boroughs. The requirement is for 6 - 7 acres of open industrial land (leased from private landlords or purchased freehold).</p> <p>A car pound facility is where the MPS deal with vehicles that have been stolen, seized for motoring offences or for forensic examination. The MPS are finding that the owners of their existing car pound sites are seeking to pursue development opportunities and cease the current use when the lease permits. Both of the current car pound sites are subject to pressure for industrial and/or residential development and intensification of use.</p> <p>The MPS are concerned that that if their existing car pounds have to be vacated, there may be no alternative sites available within London. This might mean that the MPS is no longer able to provide a car pound service, which would have serious implications for safely recovering and searching vehicles that are seized. The difficulties that exist in finding land for car pounds also extend to other aspects of policing, including the following:</p> <ul style="list-style-type: none"> - Driver training; - Firearms training; and - Dog Training. <p>The MPS are therefore requesting that Lewisham Council work with the police to identify suitable plots for the delivery of a car pound facility within the borough.</p>	<p>Noted. The requirement for this infrastructure will be included in a revised version of the Infrastructure Delivery Plan.</p> <p>The Council has reviewed this requirement and at this time is unable to identify land available to accommodate the 6-7 acres required for the facility.</p> <p>The Council will work with the MPS and other key stakeholders, including adjoining Boroughs through the Duty to Cooperate, to try and secure the delivery of this infrastructure.</p>	Infrastructure Delivery Plan amended to include a new section on emergency services and identify need for car pound facility, as suggested.

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

		<p>and environmental protection. More important than ever, the goals provide a critical framework for COVID-19 recovery. https://www.un.org/sustainabledevelopment/</p> <p>The government's 25 year Environment Plan https://www.gov.uk/government/publications/25-year-environment-plan</p> <p>EA2025 action plan https://www.gov.uk/government/publications/environment-agency-ea2025-creating-a-better-place</p> <p>This plan, EA2025, translates our vision for the future into action. We will protect and enhance the environment as a whole and contribute to sustainable development. Through this we will contribute to the United Nations Sustainable Development Goals and help protect the nation's security in the face of emergencies. The plan sets out 3 long term goals:</p> <ul style="list-style-type: none"> - a nation resilient to climate change - healthy air, land and water - green growth and a sustainable future <p>These goals will drive everything we do today, tomorrow and to 2025. They champion sustainable development, support our work to create better places and challenge us to tackle the climate emergency and deliver a green economic recovery for everyone.</p> <p>National Flood and Coastal Erosion Risk Management Strategy for England (2020) https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2</p> <p>The Strategy has three core ambitions concerning future risk and investment needs:</p> <ol style="list-style-type: none"> 1. Climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change 2. Today's growth and infrastructure resilient in tomorrow's climate: Making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as resilient infrastructure. 3. A nation ready to respond and adapt to flooding and coastal change: Ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action. <p>The New London Plan March 2021 should be added to the scoping report. https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021</p> <p>Water Framework directive status</p> <p>Sustainability Requirements, Issues and Trends - Water and Rivers/Waterways</p> <p>It is positive that Water Quality has been identified as a Key Issue within the borough. Lewisham contains significant parts of the Ravensbourne and its tributaries. There are multiple hotspots within the borough e.g. ongoing misconnections - that would benefit a long-term strategy as to how this issue could be tackled with Lewisham council utilising Building Regulations and stricter Planning enforcement to prevent future misconnections.</p> <p>Similarly plans to develop the habitats within waterways would be beneficial to over water quality and WFD status. They could for example include more detail on how they plan to do this - removing</p>	<p>report, as part of the iterative appraisal process.</p>	
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Quaggy Waterway Action Group	-	IIA Non-technical summary	<p>Biodiversity and green infrastructure, pages 10 and 11:</p> <p>As discussed, the assumption is that higher growth under Scenarios 2 to 6 would be achieved via higher densities at the same package of sites that would deliver Scenario 1, as opposed to through additional allocations, which potentially serves to reduce concerns in respect of higher growth scenarios conflicting with biodiversity and green infrastructure objectives. However, certain concerns still remain, recognising that higher density development can mean less space available within site boundaries for green and blue infrastructure.</p> <p>This is particularly a concern on account of the fact that the central spine and transport corridor that would see incrementally higher growth under Scenarios 2 to 6 is also a river valley, associated with the Rivers Ravensbourne and Pool, and is associated with a network of linked greenspace; indeed, it is identified as a strategic green infrastructure corridor by the All London Green Grid Framework.</p> <p>Issues associated with higher growth in proximity to the river corridors are discussed further below, but suffice to say here that there are issues associated with certain sites at Lewisham, along the A21 corridor, at Catford and at Bell Green.</p>	<p>We believe that promoting high density development within central, highly accessible areas is an appropriate and holistically more sustainable approach than the other options tested.</p> <p>Lewisham's housing targets like all London boroughs is informed by the London Strategic Housing Land Availability Assessment (SHLAA). It can be assumed therefore that when land that is available for development is delivered through the plan period subsequent</p>	No change.

			<p>However, on the other hand, growth can support investment in green infrastructure, e.g. a high growth strategy at BGLS could support the aspiration to enhance the South East London Green Chain, which is a GI corridor that skirts the southern edge of this area; and growth at Catford should assist with realising opportunities to deculvert and naturalise the River Ravensbourne. These opportunities are potentially highly significant.</p> <p>In conclusion, it is appropriate to highlight lower growth scenarios as preferable on balance, given risks associated with intensification along river corridors (also in proximity to railway embankments and cuttings, which are often designated as a Site of Importance for Nature Conservation, SINC) although there is much uncertainty in light of growth related opportunities, e.g. river re-naturalisation. Also, there is uncertainty on the basis that lower growth in Lewisham could lead to increased pressure for housing elsewhere. For these reasons significant negative effects are not predicted for the higher growth scenarios.</p> <p>QWAG Comments:</p> <p>How safe is the assumption that lower growth in central Lewisham would mean more pressure elsewhere when there is no prospect that growth pressures will not continue in all locations? That assumption seems to be wishful thinking because there is no suggestion that demand for development will subside once the Plan has accommodated the growth planned for.</p> <p>The statement that ‘growth can support investment in green infrastructure’ is fine until the theory is tested by whether the Plan’s policies are adhered to and implemented on the ground. That may happen but is far from certain to be the case given that major opportunities have been lost to restore rivers and the natural function, and preference has been given to installing easy-to-maintain features, hard surfacing and bland landscaping often planted with vegetation of low or no ecological value. Examples where such opportunities have been missed include:</p> <ul style="list-style-type: none"> - Lewisham Gateway where river remains in concrete albeit less deep and ecologically dead than before - Conington Road – Tesco site, where river restoration was promised in public consultations but has been negotiated away - the Silver Road / Axion House site, where river restoration has also been found to be too hard - Catford Green where the river remains in deep concrete and the only measures have been to scatter gravel on the concrete riverbed, much of which was washed away in the first heavy rains, with some hedging, trees in large litter-strewn planters and amenity planting that was poorly plane and is not well maintained. <p>The wording of the Plan policies remains ambiguous as to the actual intention to require genuine river restoration and ecological improvement as opposed to hard landscaping and amenity planning of limited ecological value.</p>	<p>housing targets may fall in the future as a result of a lack of developable land.</p> <p>The Council will continue to secure improvements to and create new green infrastructure where appropriate and push for river restoration in line with our adopted SPD on appropriate sites.</p>	
Quaggy Waterway Action Group	-	IIA Non-technical summary	<p>Development pressure on green spaces</p> <p>Paragraph 10.5, page 359</p> <p>“As the Borough’s population increases the pressure on existing parks and open spaces will invariably rise. The Lewisham Open Spaces Assessment (2019) considers the amount of open space that is needed to support the projected future population over the plan period, based on a fixed quantity standard. This suggests that a significant amount of additional provision will be required to maintain the standard over the long-term. Due to the finite availability of land and pressure to accommodate new development, such as for housing and workspace, there will be limited opportunities to create new open space. It is therefore vitally important that open spaces are protected, measures are taken to improve their functional quality, and that public access to open space is enhanced.”</p> <p>QWAG comment:</p> <p>Is it ‘inevitable’ that development pressures on existing green spaces will rise? That will happen if the Council allows that to happen and has the vague policies and weak practices to ensure such an</p>	<p>The Local Plan sets out a positive strategy for managing future growth and development across the borough, consistent with the Good Growth policies set out in the London Plan, and the principles of sustainable development set out in national planning policy.</p> <p>The Local Plan is legally required to be consistent with the National Planning Policy Framework and in general conformity with the London Plan.</p>	No change.

			<p>outcome. Surely, the very purpose of the Local Plan is to ensure that a range of aims and needs are met.</p> <p>Notwithstanding central government's policy preferencing land for housing over other uses, and the pressure the Council is under to accommodate the housing figures it has been handed, it does not make sense for people living in new housing to be denied access to nature and quality green space nearby, and allowing this to happen causes other significant pressures and costs.</p> <p>How would letting that policy run affect other important issues such physical and mental health, let alone other benefits green space provides such as urban colling and shade, reducing flood risk, helping to improve conditions for nature and string carbon?</p> <p>How has the Local Plan been tested to see how that assumption would play out?</p> <p>This is as much about strong protection for existing spaces and improving their condition and amenity, and firm design standards for green space within all new development, including ensuring people know they can use spaces for outdoors recreation from food growing, gardening and formal and informal learning and development of skills, reading a book, etc.</p> <p>It should be the role of the Local Plan and related design standards and supplementary guidance to ensure that the current inequitable provision of local green space is not carried forward in the next generation of physical development.</p> <p>It is not clear how the Plan will ensure that the deficiencies in 2020-21 will not be rolled forward over the Plan's lifetime.</p> <p>It is also unclear from the Plan how the quality and function of spaces will be improved, how that will be assessed and implemented. Given the Plan's negative stance toward the potential to create new green space, it is also unclear how the Council and the Plan will ensure that spaces are better connected through green / blue corridor enhancements. If there is no space for green space, what space exists to link up and better connect what exists?</p> <ul style="list-style-type: none"> Overall, the Plan says a lot of the right things without any sense that anything will happen other than a mass of development of dubious benefit. The nest iteration of the Local Plan will need to address this substantial flaws, ambiguities and uncertainties. 	<p>Lewisham like all London Boroughs is facing a Housing Crisis and needs to build many more homes. Particularly genuinely affordable homes. The London Plan set Lewisham a Housing Target of 1,667 new homes per year.</p> <p>The Local Plan recognises that as an Inner London Borough and due to the finite amount of land within Lewisham there will be limited opportunities to create new open space. However the Council will continue to secure improvements to open spaces from development and create new green infrastructure where appropriate.</p>	
Quaggy Waterway Action Group	-	IIA Non-technical summary	<p>Communities 3 (Accessibility), pages 12 and 13:</p> <p>There are areas in the Borough experiencing multiple deprivation that could benefit from the investment associated with new development, particularly in terms of delivering new and enhanced infrastructure, including community infrastructure, and employment opportunities. The importance of delivering new and enhanced green infrastructure is also not to be under-estimated, particularly in light of the lock-down experience of 2020.</p> <p>Higher growth at BGLS (Scenarios 5 and 6) represents a particular opportunity in this respect, recognising that this area falls within the defined Strategic Area of Regeneration that covers the south-eastern part of the Borough. The BLE Local Economic Impact Assessment (LEIA, 2020) identifies that a BLE station would bring with it a 'dramatic rise' in the Healthy Streets score currently assigned to immediate environs of Lower Sydenham Station, and it may be that a masterplanned higher growth strategy for the area could lead to benefits over-and above those envisaged by the LEIA.</p> <p>It is also likely that a higher growth strategy could help to ensure that benefits accrue for existing communities well-beyond the 1km zone, surrounding the station, that is the focus of the LEIA. A tall buildings cluster could bring with it a new town centre, which could significantly improve the ability of nearby communities to access services, facilities, retail and employment.</p> <p>The new community would also benefit from excellent access to green and blue infrastructure, in the London context, with the Pool River adjacent and Beckenham Place Park (which might potentially form part of a new Regional Park in the future) a short distance to the south. One of the proposed allocations - Sydenham Green Group Practice - does comprise an existing large health centre; however, it is assumed that development would re-provide and potentially help to support the improvement of health infrastructure, linked to the public sector estate programme.</p> <p>With regards to Catford, which is associated with a notable concentration of multiple deprivation, the proposal under Scenarios 1 and 3 is to assign indicative residential densities to the four sites within</p>	<p>As part of the Local Plan preparation an Infrastructure Delivery Plan (IDP) is published. The IDP sets out the necessary infrastructure (schools, health care facilities, road and public transport improvements etc) that is required to accommodate the level of growth anticipated through the Local Plan.</p>	No change.

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

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

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

Regulation 18 consultation statement

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

September 2022

Organisation (if relevant)	Part	Section, policy or paragraph	Comment	Council officer response	Action
Blackheath Society no 2	1		Endorse idea of Good Growth. 'Open Lewisham' is vague/uninspiring (page 15).	Support noted. The draft Local Plan strategic objectives and spatial strategy provide further details on 'Open Lewisham' which both refers and helps give effect to the Council's currently adopted Corporate Strategy and the Corporate priorities contained therein.	No change.
Blackheath Society no 2	1		Fails to recognise possible big impact of covid and Brexit on future growth/mix	Noted. The draft Local Plan was largely prepared before the peak of the Covid-19 pandemic. Additional evidence will be prepared following the Regulation 18 consultation taking account the latest information on the impact of Covid-19, Brexit and related issues. The Council is required to review its adopted Local Plan every 5 years and consider the scope for changes informed by monitoring and new evidence. The review process will allow for consideration of the longer term impacts of Covid-19 and Brexit.	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections
South East London Labour for a Green New Deal	1		The plan could adopt and support emerging neighbourhood planning ideas, such as the Deptford Work Anchors included in the Deptford Neighbourhood Plan under consultation (integrating co-working spaces, studios and space for local production, up-cycling, repairing and re-purposing of old or faulty goods, becoming centres for a more circular economy as well as arts and culture and encouraging further integration of child-friendly places and play provision, as well as public health and well being facilities).	The Local Plan is being prepared in accordance with the Council's adopted Statement of Community Involvement. The Council has taken into account emerging Neighbourhood Plans and used them to inform the draft Local Plan, particularly the Part 3 policies. This is in line with national planning guidance. However, it is the role of the Local Plan to set the 'strategic policies' for the Borough, and Neighbourhood Forums are encouraged to prepared Neighbourhood Plans with non-strategic policies to help support the delivery of the Local Plan.	No change.
Blackheath Society no 2	1	-	Nothing on need for good cross-border cooperation with Royal Borough of Greenwich, despite boundary running through Village and across Heath	Noted. The Council has and will continue to engage with Royal Borough of Lewisham through the statutory Duty to Cooperate.	No change.
Blackheath Society no 2	1	-	<p>"We are producing a new Local Plan to</p> <ul style="list-style-type: none"> Respond to changes in wider planning context YES Respond to the Climate Emergency YES Meet needs for genuinely affordable housing, jobs, and community facilities, incl high quality green spaces YES, but what happens where these conflict? Secure delivery of BLE & other transport infrastructure" YES, but too much emphasis on BLE (750 refs), uncontrollable by LBL. <p>How are all these big issues to be prioritised, especially when they clash?</p>	The draft Local Plan sets out the reasons for the Local Plan review. They are not listed in order of priority or intended to be read as such. The Local Plan seeks to deliver Good Growth and sustainable development in accordance with higher level planning policies.	No change.
DNA	1	-	01 We welcome the Council's explicit statement to work with local communities and community groups involved Neighbourhood Plan to improve transparency and openness in decision-making, and to foster greater public understanding of and involvement in the planning process. We ask the Council therefore to develop objectives and policies supporting the continuous and meaningful engagement in planning matters. We ask the	Note. The Council's adopted Statement of Community Involvement sets out how the public will be consulted on the preparation of planning documents and planning applications. The SCI is subject to periodic review. Draft Local Plan policy HO4 on housing estate maintenance, renewal and regeneration is clear that the London Mayor's Good Practice Guide to Estate	No change.

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

			We feel, however that there could be more ambitious language surrounding this in the strategy. Whilst there is a commitment that all new development should respond to the climate emergency through adaptation and mitigation, we believe that responding to the climate emergency should also be part of wider decision making, for example in OL1b <i>Directing new investment to the Borough's strategic Area for Regeneration, and other local areas for regeneration, and coordinating the delivery of this investment to help tackle deprivation and ensure equality of opportunity within the context of an effort to tackle the climate emergency and strategically use the opportunities that this may bring</i> "		
London Wildlife Trust	1	OL 01	<p>OL1 Delivering an Open Lewisham (spatial strategy)</p> <ul style="list-style-type: none"> Clause f: Whilst we support the principle of this (as in paras 3.38-41) we are concerned by the statement; <i>'Proactively seeking to make the best use of land and space, and prioritising the redevelopment of brownfield land for new housing and workspace, along with optimising the development of strategic sites and other smaller sites across the Borough, including...'</i> Given that brownfield land is the foundation for many of Lewisham's SINC's, we would hope that the <i>'brownfield land'</i> is caveated with a <i>'of low or negligible ecological value'</i> (aligning with NPPF paras 117 and 118b), so that development doesn't inadvertently undermine the potential for securing a viable nature recovery network, which may include SINC's from new 'brownfield land'. This could be set out to give clarity in para 3.42 <p>Para 3.42 See points made above.</p>	Noted.	Local Plan policy OL1.F amended to refer to brownfield land of low or negligible ecological value, as suggested.
London Wildlife Trust	1	OL 01	Clause h: Strongly support	Support noted.	No change.
London Wildlife Trust	1	OL 01	We support the thrust of the objectives set out in paras 3.47-50. However, 3.49 appears to base its principles on the old canard that greenfield sites are always more important for biodiversity than brownfield sites. As the 'green' and 'brown' are merely crude indicators of past use, it would be better to reference their existing value and context, whatever a particular site's history. So the best sites are protected for nature's recovery, and those of least value might be preferred for development. We recognise that either can usually be enhanced for biodiversity.	Noted.	Local Plan policy OL1 supporting text amended to refer to support to redeveloping brownfield land of low or negligible ecological value, and signposting opportunity to enhance ecological value of brownfield sites.
NHS (HUDU)	1	OL 01	<p>OL1 Delivering an Open Lewisham</p> <p>We broadly support this draft policy; however, we propose that clause g) is strengthened to support f) which refers to the delivery of community and transport infrastructure but not how it will be funded or delivered. We also suggest</p>	Noted. Arrangements for the funding and delivery of infrastructure are set out in Part 4 of the draft Local Plan. The plan must be read as whole.	No change.

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

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

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

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

Home Builders Federation	1	Para 2.13	<p>Part 1: Lewisham Today and Planning Ahead</p> <p>Planning ahead for an Open Lewisham The Council observes on page 43: <i>“The rapid population growth experienced in Lewisham in recent years is expected to continue, with projections estimating a 19% population growth between 2017 and 2040”.</i></p> <p>We agree that the Council is wise to be cautious about the future population growth of Lewisham. Many commentators, including the Greater London Authority (GLA), have stated that it is hard to know whether the pandemic will make a structural or temporal change to the population of London. Consequently, it would be unwise to set an alternative figure for expected housing growth in Lewisham over the plan period from that set by the recently adopted London Plan (adopted February 2021). Furthermore, as London is treated as a single housing market area, where housing needs generated in local authority can be provided for by another, it would cause difficulties for planning for London’s housing needs if one local authority decided unilaterally to set a different target, especially one that was lower than the London Plan minimum figure of 52,000 dwellings per annum (dpa).</p> <p>The overall need for London – or the objectively assessed housing need to use language that is perhaps falling out of favour – is 66,000dpa.</p> <p>Corrections in the rate of household formation across London as a whole, which may or may not reflect a lower rate of household formation in the wake of the pandemic, will be made by the Mayor, through a review of the London Plan.</p> <p>Much has been made of the 700,000 people who have been said to have left London since the pandemic. However, it is unclear how this translates into households and where in London these people were living prior to leaving. It is hard to assess how these recent changes will feed-through into projections of household formation in Lewisham.</p> <p>Even so, plan-makers will need to be mindful of the fact that housing need may not necessarily fall overall in England, even if the geographic patterns of demand may change. For example, although currently there are indications that relatively more affluent homeowners are leaving London to live in locations elsewhere in England,</p>	Noted. The London Plan (2021) housing target for Lewisham will be reflected in the Local Plan as the strategic housing requirement.	Local Plan amended to remove references to the standard methodology for Local Housing Need, and make clear that the Local Plan will ensure delivery against the London Plan housing target for Lewisham.
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			this will require the GLA to engage with the local authorities of the Wider South East to reflect these shifting trends in migration when making new plans. In brief, is hard for Lewisham to deal with these broader trends through a local plan. This will be addressed more effectively by the Government through changes to the Standard Method for assessing housing need, and by the GLA through establishing the likely housing need overall for all London.		
The St John's Society	1	Para 2.13	Projections for growth need to be constantly assessed and reassessed. Much is currently in flux and will surely change by 2040.	Noted. The Council is required to maintain an up-to-date Local Plan and review its adopted plan at least every 5-years. Growth projections and London Plan housing targets will be considered through the plan review process.	No change.
Deptford Society	1	Section 01	<p>The plan is intended to cover a period of 20 years. A lot can change in this time. How regularly will it be revisited or updated to address changes in policy, funding availability and priorities?</p> <p>What flexibility does the plan offer in the event of new demographic shifts? (e.g. 700,000 immigrants have left the country) Do we really need the numbers of new dwellings projected? How can the plan adapt to changing circumstances?</p> <p>What long-term impact is Covid expected to have on residential and workspace demands and how will the local plan respond to this?</p> <p>Connections and interrelationships between categories are not explained or explored. E.g. land development viability calculations for housing are impacted by the very high cost of construction, which in turn is driven by a shortage of skills and training. There is no clear indication of how the new Local Plan proposals differ from, or exceed (or reduce) provisions or commitments currently in place.</p>	<p>The Council is required to maintain an up-to-date Local Plan and review its adopted plan at least every 5-years. Any future review and update to the Local Plan will be considered taking into account findings of the Council's Authority Monitoring Report and changes in higher level policy and legislation.</p> <p>Since the Regulation 18 stage document was published, the Council has carried out additional studies to consider the impact of Covid-19, including a Town Centres and Retail Study and Strategic Housing Market Update. Findings have informed the Regulation 19 plan.</p> <p>A Viability Assessment of the Regulation 18 Local Plan was undertaken. This will be reviewed and updated at the Regulation 19 stage to take account of changes made to the plan, and the latest baseline information on development viability.</p>	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections
Deptford Society	1	Section 01	<p>Page 30 Neighbourhood planning. The role of amenity societies and where they sit in the context of neighbourhood forums and neighbourhood planning needs to be clarified.</p> <p>Page 37 North Lewisham is home to one of London's first Creative Enterprise Zones. What does this mean in the context of planning? Further explanation or a definition is needed.</p>	<p>The Council values the role that amenity societies play locally and recognises their important contributions to planning and other matters. The role of community groups such as societies in the planning and development process is set out in the adopted Statement of Community Involvement, which is a procedural document which sits alongside the plan.</p> <p>The introductory section of the Local Plan discusses neighbourhood forums as they are formally designated for plan making functions, and neighbourhood plans form part of the statutory development plan.</p> <p>A definition of CEZ is included in the glossary. Creative Enterprise Zones are an initiative from the London Mayor to designate areas where artists and creative businesses can find permanent affordable space to work; are supported to start-up and grow; and where local people are helped to learn creative sector skills and access pathways to employment. Lewisham has</p>	Local Plan amended to signpost amenity societies in the introductory section.

				been designated a CEZ. Part 3 of the Local Plan, Lewisham's North Area includes policies to support this.	
Lee Forum	1	Section 01	<p>PART 1: Strategic and nonstrategic policies</p> <p>Engagement is restricted to a focus on strategic partners and little is said about engagement at the community level though amenity groups. For Neighbourhood Forums: Clarity on what 'will work positively' means in practice is needed. Para 1.44 1.45 is it only to get Neighbourhood Plans to adoption? What engagement will happen after adoption? The Lewisham local plan suggests forums can support the local plan's implementation but we consider the focus should be that the local plan ensures that Neighbourhood plans are applied in planning decisions. We would like clarity on what the council sees as a working relationship between forums and amenity groups and the council</p>	<p>Part 1 of the draft Local Plan states that the Council will work with local communities and community groups to improve transparency and openness in decision-making, and to foster greater public understanding of and involvement in the planning process.</p> <p>The introductory section of the Local Plan discusses neighbourhood forums as they are formally designated for plan making functions, and neighbourhood plans form part of the statutory development plan. The Local Plan also sets out the relationship between strategic and non-strategic policies, as required by the National Planning Policy Framework.</p> <p>The Council has a statutory duty to support neighbourhood forums. Further details on the role of the local authority in neighbourhood planning are set out in the National Planning Practice Guidance. Information is also available on the Council's planning webpage.</p> <p>Neighbourhood plans which are adopted and made form part of the statutory development plan and will be considered in planning decisions.</p>	No change.
Lee Forum	1	Section 01 Evidence base	Projections for retail and housing growth should be kept under review given the uncertainty of what post covid retail will look like given the shift to both online shopping and changes to office / home based work patterns.	<p>Noted. The Council is required to maintain an up-to-date Local Plan and review its adopted plan at least every 5-years.</p> <p>The London Plan sets a strategic housing target for Lewisham, which the Local Plan must address.</p> <p>Following the Regulation 18 consultation, a new retail and town centres study has been undertaken. This provides updated town centre health checks and also considers new data, including on the impacts of Covid-19, online shopping trends and new Permitted Development rights. The study and its recommendations have been used to inform the local plan.</p>	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections
London Wildlife Trust	1	Section 01	<p>1. About Lewisham's Local Plan</p> <p><i>Planning framework</i></p> <ul style="list-style-type: none"> • Para 1.11: We note the 'extinction crisis' is not referenced, despite State of Nature (2019), the 25-year Environment Plan, and the objectives of the Government's Environment Bill. 	Noted. The planning framework documents cited are intended to refer principally to the government's national planning policies and legislation around plan production. Relevant key plans and strategies for different topic areas are signposted elsewhere in the Local Plan.	Local Plan Policy GR3 (Biodiversity and Access to nature) supporting text amended to include reference to the Environment Bill and State of Nature Reports (2019).
Sydenham Society	1	Section 01	<p>Strategic and non-strategic policies</p> <p>Neighbourhood planning</p> <p>P30</p> <p><i>The Council has a statutory duty to support designated neighbourhood forums in the preparation of neighbourhood plans. We will work positively with forums to ensure their plans appropriately support the Council's strategic planning priorities, so that they have the best chance of succeeding at the examination stage and can be formally adopted. This Local Plan is presented in a new format that responds to the strong interest in neighbourhood planning in Lewisham. For example, Part</i></p>	<p>The Council values the role that amenity societies play locally and recognises their important contributions to planning and other matters. The role of community groups such as societies in the planning and development process is set out in the adopted Statement of Community Involvement, which is a procedural document which sits alongside the plan.</p> <p>The introductory section of the Local Plan discusses neighbourhood forums as they are formally designated for plan making functions, and neighbourhood plans form part of the statutory development plan.</p>	Local Plan amended to signpost amenity societies in the introductory section.

			<p><i>Three sets key objectives and priorities for the Borough's character areas. It provides a useful reference point from which neighbourhood forums, and other community groups, can work to support the Local Plan's implementation.</i></p> <p>The Sydenham Society supports the ambition to create neighbourhood forums in the Borough but maintains that amenity groups and civic societies should not be downgraded in a hierarchy of community groups. The Forum of Conservation and Amenity Societies (FOCAS) meets regularly and should be accorded equal status in consultation and plan-making. The Society welcomes the accessible format of the new Local Plan.</p>		
Telegraph Hill Society	1	Section 01 Strategic objectives	<p>§ 3.1 The Vision for Lewisham mentions “vibrancy of our high streets, local businesses, arts and cultural establishments, our evening and night-time economy and our world-renowned institutions”. There is no reference to the heritage of the Borough nor reference to protecting this within the “Vision for Lewisham”. There should be such specific reference in order to support Strategic Objective F.</p>	Noted. Whilst the Vision does not specifically refer to heritage, this is captured in the first part of the Vision which states that “Lewisham will continue to be a welcoming place where the culture and diversity of our people, and the unique qualities of local neighbourhoods, is recognised and protected”. Priorities and policies for conserving and enhancing heritage is clearly set out in the plan's strategic objectives and Part 2 and 3 policies.	No change.
Telegraph Hill Society	1	Section 01 Strategic objectives	<p>As noted above, § 3.1 also fails to mention increasing the Borough's employment base. There should be such reference in order to support Strategic Objective C.</p>	Noted. Growing and strengthening the local employment base is considered to be captured by the draft Local Plan Vision in the 3 rd paragraph.	No change.
London Wildlife Trust	1	Section 02	<p>2. Lewisham Today & Planning Ahead</p> <p><i>Lewisham in context</i></p> <ul style="list-style-type: none"> • Para 2.9: We suggest some brief reference here to the Great North Wood on the western ridge, the River Thames frontage and tributaries (Quaggy, Ravensbourne, Pool) here. 	Noted. This introductory part of the draft Local Plan provides a high-level overview. The importance of the Great North Wood and River Thames / tributaries is captured in Part 2 and Part 3 of the plan, where there are detailed policies covering these important features.	No change.
London Wildlife Trust	1	Section 02	<p><i>Planning ahead for an Open Lewisham</i></p> <p>We note that the natural environment is briefly referenced in the Planning ahead paras (notably 2.23, 2.26), but nothing explicit, for example the context of the 25-year Environment Plan, the Environment Bill (with its mandatory requirement for Biodiversity Net Gain), and regionally the London Environment Strategy's habitat restoration/enhancement & creation objectives, London Urban Forest Plan5, and sub-regional catchment plans.</p>	Noted.	Local Plan Policy GR3 (Biodiversity and Access to nature) supporting text amended to include reference to the noted key plans and legislation, including Environment Bill and State of Nature Reports 2019.
NHS (HUDU)	1	Section 02 Para 2.15-2.16	<p>Paragraphs 2.15 sets out the 2021 London Plan ten year target of 16,670 homes for the borough. However, the draft plan refers to seeking to exceed this and in paragraph 2.16 to provide for the estimated demand for approximately 5,300 net additional square metres of retail floorspace up to 2030 and 21,800 net additional square metres of employment floorspace up to 2038.</p>	<p>The London Plan sets a strategic housing target for Lewisham, which the Local Plan must address. As the draft Local Plan Regulation 18 document was being prepared, the London Plan (2021) had not yet been adopted, therefore consideration was given to the Local Housing Need figure in line with national planning policy.</p> <p>Following the Regulation 18 consultation the Council has undertaken additional work on evidence. This includes a new retail and town centres study. This provides updated town centre health checks and also considers</p>	Additional evidence base documents have been prepared and informed the next stages of plan production, taking into account the latest baseline information. This includes a new Retail and Town Centres Study, Strategic Housing Market Assessment and updated GLA population projections.

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

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

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

		<p>Urban centres have become a haven for wildlife, and this needs to be encouraged. Insects have suffered a tremendous decline over the last decade, so the use of insecticides and pesticides by the council e.g. for path management is unacceptable. Please consider alternative practices and engrain these in the policies.</p> <p>Improve access to the recycling facilities The Landmann centre is not accessible enough for people who don't have cars. Hiring a small van (most often the cheapest hire car available) and taking rubbish to the centre could be an option for some residents if not for a ban on vans - seems like an exception is needed to facilitate the process and potentially alleviate fly tipping of bulky items on the streets. If the Council is serious about air quality and sustainability issues, then such a car-centric approach to accessing the only recycling centre needs to change. Perhaps smaller sites need to be introduced across the borough to assist those with no access to a car.</p> <p>There should be recycling bins in the streets rather just one container. If the waste gets separated out in the recycling centre, people should be informed, otherwise it might discourage them from recycling at home.</p> <p>There is really poor provision of electrical items recycling in the borough. On a recent quest to recycle some old appliances, I visited one of the four sites that are still active, only to find the bins overflowing.</p> <p>Wastewater treatment Anybody who's taken a walk along rivers Pool or Ravensbourne after a heavy rain would have noticed heavy pollution from raw sewage, which is unacceptable, so while I applaud the objective of "protecting the amenity of residents and visitors, particularly from pollution", there is not enough emphasis on ensuring the improvements are for the benefit of wildlife as well.</p> <p>The Thames has some hope in the form of the Tideway project, but smaller rivers are left to suffer. The emphasis on increasing connectivity of green spaces is commendable, however I would like to see a commitment to:</p> <ul style="list-style-type: none"> •Protecting waterways from sewage to both enhance natural habitats and improve people's enjoyment of the walkways •Control road run off around industrial sites (e.g. the various workshops along river Pool) 	<p>The draft Local Plan includes policies on managing wastewater and enhancing Lewisham's waterways, which address concerns raised in this representation.</p> <p>The Council's Reuse and Recycling Plan (2019) and new Waste Management Strategy 2021-2031 set out priorities for recycling throughout the borough.</p>	
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			<p>•Ensure planned densification does not exacerbate the sewage pollution problem, and appropriate CIL is charged to fund improvements to infrastructure to reduce pollution events.</p> <p>In terms of river pollution events, given that some densification has already occurred, it does not seem that the delivery of necessary infrastructure had happened, so the objective of SECURING THE TIMELY DELIVERY OF INFRASTRUCTURE is commendable albeit lacking an emphasis on wastewater treatment.</p>		
	1	Section 03 Strategic objectives	<p>I would also like to make the following additional comments on the Strategic Objectives:</p> <p>SECURING THE TIMELY DELIVERY OF INFRASTRUCTURE</p> <p>Network of public toilets Humans need toilets and if people are to ditch cars and use more sustainable modes of travel (walking and cycling), then the Council needs to provide access to decent loo stops. The pandemic has highlighted that businesses cannot be relied upon to provide public toilets.</p> <p>Cycling routes LTN have been a great boon for cyclists, walkers and residents, so these should be encouraged. They are not expensive to roll out and have been proven effective across London and should continue to be implemented.</p> <p>Direct and interconnected routes are very important. Separating cycle ways from roads is very welcome, but much more work needs to be done to make junctions safer for cyclists, for example the notorious roundabout in Crofton Park where Brockley grove peels away from Brockley Road.</p> <p>Pedestrian safety at busy junctions It is unacceptable that in 2021 even able-bodied people need to run the gauntlet across some of the busiest junctions in the borough, while disabled and visually impaired people are discriminated against due to the lack of pedestrian signals on busy intersections. Amongst the examples are: •Catford Road / Thomas Lane crossing is very busy and almost impossible to cross. Temporary lights installed earlier this year highlighted how much of a barrier the lack of a signalled crossing is. Southern circular - Brownhill Road / Verdant Lane •Blackheath Hill (A2) seems like another hard boundary where pedestrian crossings are few and far between,</p>	<p>The draft Local Plan Part 2 policy QD3 Public Realm seek to ensure more and suitable provision for public toilets.</p> <p>The draft Local Plan sets out measures to help achieve the Mayor's objective for 90 per cent of journeys in inner-London to be made by walking, cycling and public transport. This includes policies which support the delivery of a safe and well connected network of cycleways, as set out in the Lewisham Links.</p> <p>Part 3 of the draft Local Plan sets out specific requirements on site allocations. Elsewhere, improvements to specific junctions and cycleways, may be addressed through Lewisham's Cycle Strategy or the Council's Local Implementation Plan.</p>	No change.

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

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

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

			Despite referenced in Table 3.1 we note there is nothing about protecting the best assets, such as those of the built heritage, or ecological value. It states “unique qualities of local neighbourhoods” which we feel requires a better definition. We would like to a statement of commitment to protecting irrecoverable irreplaceable assets (e.g. ancient woodland). This referenced to some degree in 1:3 (para 3.47), but suggest a bit more up front clarity here.	these are integral part of the Borough. The Part 2 and Part 3 policies provide further details on their protection and management.	
London Wildlife Trust	1	Section 03 Strategic objectives	We would like to see respect (from planning proposals and decisions) also applied to the diversity of the non-human residents of the borough as well.	Noted. Respect for natural environment is reflected in the objectives, for example, Objectives 9 and 13.	No change.
London Wildlife Trust	1	Section 03 Strategic objectives	<i>Strategic objectives</i> Table 3.1 <ul style="list-style-type: none"> We welcome Strategic Objectives D (8-10), E (11-12) and F (13). Under 8 – what does National Park City status mean? – we don’t know, so would be good to include a definition of what it is, and how it will be measured and monitored? Under 9 – support in principle, but protecting some of the best & most vulnerable assets means restricting or managing access. 	Noted. The objectives and information for National Park City are set out in the London Plan.	No change.
London Wildlife Trust	1	Section 03 OL 01	<i>Key considerations</i> <ul style="list-style-type: none"> Para 3.11 <i>Green and open spaces</i>: There appears to be a gap “<i>The network of green infrastructure is shown in.[BLANK]</i>” – we presume it is Figure 3.3 Figure 3.3 This shows a patchwork rather than a network; it doesn’t show gardens or rail corridors as such. Would expect a more detailed map in line with the NPPF’s requirement of ecological networks. 	Noted. The diagrams referred were included for illustrative purposes, to support considerations for the overall spatial and development strategy. The extent of designated open spaces and biodiversity sites is set out elsewhere in the plan.	No change.
London Wildlife Trust	1	Section 03 OL 01	<i>Spatial strategy options</i> <ul style="list-style-type: none"> We are reassured by preferred option 1 Option 3a puts increased pressure on an existing natural corridor (Ravensbourne & Pool rivers) which arguably needs to widen to ensure it can function more like a natural ecosystem and provide climate resilience Figures 3.8-3.9 Strategic Green links appear to be mostly rail corridors; perhaps this should be made clear, as their ecological function is not the same, and there are ‘gaps’ in these corridors. 	Noted. The diagrams referred were included for illustrative purposes, to support considerations for the overall spatial and development strategy. The extent of designated open spaces and biodiversity sites is set out elsewhere in the plan. A review of green corridors has been undertaken as part of the Open Space study update and has informed the Regulation 19 plan.	No change.
NHS (HUDU)	1	Section 03 Strategic objectives	Vision, Strategic Objectives and Spatial Strategy We welcome the inclusion of the Strategic Objectives particularly G, F and H with specific relevance to our work. While these recognise that the Local Plan can help address	Support noted. It is considered that the suggested changes are currently captured within the Local Plan vision, particularly where it states that Lewisham will become “a greener, healthier and more resilient place”. The	No change.

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

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

		<p>sewer can be complex and dangerous, therefore they should only be considered where no alternative points of connection to local sewers are available. We don't allow connections to trunk sewers in greater London – instead, the developer will need to choose an alternative point of connection to a non-trunk sewer or requisition a new connection and associated pipe laying from us. If the developer applies for a requisition, we'll select a suitable connection point, which may not be your preferred connection point. Where a connection into a trunk or chemical sewer is necessary, we will insist on carrying out the work ourselves and recharge the developer under Section 107 of the Water Industry Act 1991. An application to connect must be submitted to Thames Water developer services as early as possible to allow time to conduct technical reviews and surveys as required – costs will apply. Please see more information on the application process for connecting into a trunk or chemical sewer</p> <p>https://developers.thameswater.co.uk/Domestic-and-small-commercial/Wastewater/Connecting-to-a-trunk-or-chemical-sewer</p> <p>Process</p> <p>We use the information in local plans to estimate when upgrades will be required. It is therefore important that the local authority keep us informed of any changes to local plan numbers and how well they are delivering homes against those objectives. Where this doesn't happen it could lead to delays in the delivery of vital infrastructure</p> <p>Network</p> <p>Where offsite upgrades are required to serve development they will be delivered and funded by Thames Water using infrastructure charges more info here</p> <p>https://www.thameswater.co.uk/developers/charges</p> <p>The time to deliver upgrades shouldn't be underestimated it can take 18months – 3 years from the time of certainty and in some cases it may be appropriate for a suitably worded planning condition to be attached to ensure development doesn't outpace the upgrades. Developers are encouraged to engage at the earliest opportunity to discuss their development needs via Thames waters pre planning service</p> <p>https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p>		
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			<p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section.</p> <p>Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.</p>		
Transport for London	1	Section 03 OL 01	<p>The BLE Local Economic Impact Assessment, which we understand to have been subject to detailed analysis of the impact of the BLE along its proposed route, clearly shows that other than promoting good growth and economic development, there will be additional development impacts in north, central and south Lewisham along the BLE corridor. The draft local plan only shows notable additional development impact in Lower Sydenham area.</p> <p>In the local plan, it is not clear what development is associated with Phase 1 versus Phase 2 of the BLE. The scenarios with and without BLE show broadly the same levels of development, which is inconsistent with supporting statements that the BLE unlocks development (e.g., p. 73 (3.3.8) p. 439, p. 447-450). The only indication that the BLE unlocks development is in the footnote of Table 13.1 (p. 473) where a range is provided for the South because of BLE Phase 2. There is no indication in the housing numbers that BLE Phase 1 to Lewisham unlocks any development.</p> <p>To enable the differences between the scenarios to be clearly seen, it would be helpful to provide tables setting out the quantum of development with and without the BLE as identified within BLE Local Economic Impact Assessment which forms a supporting document to the draft local plan. We would also welcome further clarification of Figures 3.5-3.7 which are difficult to read.</p> <p>Note that Figures 3.5 to 3.7 are incorrectly referred to as Figures 1.5 to 1.7 in section 3.15 on p. 58.</p>	The spatial scenarios set out in the Local Plan Regulation 18 document were based on detailed assessments included in the Integrated Impact Assessment (IIA). Maps of the spatial scenarios were included for illustrative purposes, and to support the public consultation in respect of reasonable alternatives / options for the strategy. The Local Plan stated that the IIA should be referred for further information. The indicative figures for housing quantum under each scenario are included in the IIA.	No change.
Transport for London	1	Section 03 OL 01	<p>A caveat should be added to the maps, such as: <u>'The route selection for the Lewisham to Hayes section remains at an early stage and is subject to further development and public consultation by Transport for London'</u>. TfL will continue to involve the Council as options emerge, and decisions are taken. We would appreciate if phases 1 and 2 can be differentiated on the</p>	Noted.	<p>Local Plan Policy OL1 amended with supporting text on BLE route selection, as recommended.</p> <p>Plans which show the BLE amended to differentiate between phases 1 and 2.</p>

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

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

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

			<p>QWAG Comments:</p> <p>The Local Plan should support local distinctiveness but too much development has been permitted which is not resonant of or reflective of the locality, and could be plonked down anywhere.</p> <p>The opportunity to ensure that works to the rivers and their confluence in central Lewisham made the most of Lewisham being one of the few London boroughs with not one but two rivers flowing through the main urban centre, and with much of the borough's diverse population able to be involved and inspired by greater contacts with and knowledge of their local rivers.</p> <p>The Lewisham Gateway scheme has done the minimum possible with the rivers, which remain in concrete albeit with some artificially created meandering, riffles and flow, and the nearby small open space is of limited amenity and ecological value and does nothing to underpin local distinctiveness; the scheme happens to be in central Lewisham but it could be anywhere because it says nothing about the area.</p> <p>It remains unclear how the Local Plan will result in spaces and places which support and reinforce the borough's distinct environment, heritage and culture.</p>		
Telegraph Hill Society	1	Section 03	We comment on this separately before commenting on Part One of the Plan in detail as we believe this is fundamental to the Plan.	Noted. Responses to representations set out elsewhere in the Consultation Statement.	No change.
Telegraph Hill Society	1	Section 03 Vision	4. The Vision set out in §1 3.12 is aspirational. We would question however as to whether the Plan achieves this and in particular whether the policies are consistent with creating a place <i>"where all generations ... choose to stay"</i> . We comment within the body of this paper on the impact of high-rise buildings, the increasing density and the lack of green space. The Plan itself notes the lack of local employment but the Vision sets out nothing about changing this.	The vision, supporting objections and policy requirements within the Local Plan address issues of protecting and enhancing the boroughs green infrastructure as well as promoting job opportunities and growing the local economy.	No change.
Telegraph Hill Society	1	Section 03 Strategic objectives	The Strategic objectives do not appear to build on the Vision and the Plan does not follow it through. Whilst the Vision is long-term, the Plan is not, it is merely incremental, constrained by the Mayor of London's current London Plan whether or not that actually leads to Lewisham's Vision. Any plan should work forward from the Vision, starting from first principles of what the Borough should look like and then accepting that parts of such a plan would not be achievable whilst those current policies are in place and whilst funding is in short supply, but nevertheless setting out long-term goals and measurable targets. That way the Vision would be a true aspiration for the Borough and a bench mark for future policies.	Disagree. There is a clear link between the vision and the strategic objectives.	No change.
Telegraph Hill Society	1	Section 03	As set out, the Borough is in danger of repeating the mistakes of the last fifty years whereby it has become a	Whilst it is accepted that the Local Plan does promote high density development and tall buildings in appropriate areas. This will be part of the	No change.

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

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

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

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

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

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

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

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

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

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

			Borough to date. The approach needs to involve those who live in the area and § 3.46 should reflect this. Whilst we appreciate that the Council has a Design Panel, this comprises mainly of professionals and not of those who will have to live in the areas affected by the designs considered. The Borough should make a commitment to improving consultation processes, when funds allow, by supplementing the Design Panel with the Amenity Societies Panel which previously provided this involvement but was cancelled due to a stated lack of resources. It would also be helpful if the Borough could commit to assisting in the production of Neighbourhood Plans, should the funds be available, as these are difficult for many of the smaller but well defined neighbourhoods, such as Telegraph Hill, to produce without such support (see our comments on Part Four in paragraphs 259 through 270).	Consultation processes for planning applications are carried out in accordance with national legislation and in line with the council's adopted Statement of Community Involvement.	
Telegraph Hill Society	1	Section 3	Again, we also take issue with the word " <i>positively</i> " in this context in § 3.46 - see our comment at paragraph 42. For Conservation Areas, " <i>Good design</i> " will also need to be led by revised Character Appraisals, with considerably more detail than the existent ones, and more developed SPGs. We would welcome a commitment to this, when funds allow, in the explanatory section of the Plan here.	Policy HE 2 outlines our approach to development within Conservation Areas., which is considered to be consistent with national planning policy. The draft Local Plan requires development proposals to submit a Heritage Statement. Policy HE1 sets out the Council's approach to foster greater understanding of the historic environment, including assessment, monitoring review of assets, which could include but is not limited to CA appraisals. One of the key monitors in the Local Plan monitoring framework is the adoption of Area Appraisals and Management Plans for all conservation areas	No change.
Telegraph Hill Society	1	Section 3	We support the principle of § 3.47 . A specific statement should be made to the effect that new development must help to reinforce the special characteristics of the Borough. We would also refer to the need to specify assistance to residents in working to defining those special characteristics still further, in order to ensure that they are preserved thereby supporting Strategic Objective F13 .	Noted. The special characteristics of the borough will be considered on a case by case basis. In terms of built and natural environments, the Council has prepared an extensive evidence base which helps to identify and distinguish these, which development proposals will be expected to have regard to. The Council will continue to engage with local communities to broaden understanding of local distinctiveness, including through the formal plan-making and planning approvals process.	No change.
	1	Vision	While it's good to have a long term plan for the borough, we respectfully ask you to be far more ambitious and specific with your vision and to set ambitious and measurable targets to ensure that that vision is realized. At the moment, your 'vision' is more like a 'vague hope'. Lewisham's vision needs to have a far more 'active' aim. Such As: <u>We will ensure that Lewisham has the best quality of life for residents of any London Borough</u> You then need of measurable standards to map progress against over the next 20 years. Standards should include things like: <ul style="list-style-type: none"> • per capita ratio of people to open public green spaces • breathable air quality 	Noted. The vision is an aspirational statement about the type of Lewisham will become over the plan period. It is supported by strategic objectives and planning policies which will help to achieve the vision. Part 4 of the Local Plan sets out a monitoring framework with targets along with indicators to measure performance of the plan, which is divided in to thematic policy areas. These additional monitors/indicators generally address those suggested by the representation.	The Part 4 monitoring framework has been reviewed and updated with additional indicators.

		<ul style="list-style-type: none"> • access to quality education • support for local business • protection of heritage street scenes and architecture • access to family housing • access to local work and support of local services for all, like medical facilities and healthy living services • etc <p>Within each of those standards, in order to measure your success at the end of 20 years, there should be a series of targets, able to be measured at regular intervals to chart progress.</p> <p>e.g. we will take the necessary steps to ensure AIR POLLUTION will be 50% lower than it is today by the end of 2040. (with steps listed you take to achieve this year by year until 2040.)</p> <p>e.g. for Green Space – we will have a target of establishing x number of new parks and nature reserves to ensure the ratio of people to Green space is 50% or 75% better (or whatever benchmark you choose to evidence success) than now by the end of the 2040</p> <p>e.g. for access to family housing – we will have a target for everyone on the Lewisham Council Homes waiting list to have been offered a social home by the end of 2040</p> <p>e.g. for protection of Lewisham’s heritage street scenes, we will have a program of works set out to restore, retain, protect local heritage over the next 20 years. (This could include everything from creating new Conservation Areas, to more stringent protections for traditional high streets and residential areas etc.)</p> <p>Not everything will require funding....but all will require will and creativity and the adherence to quality standards to ensure targets are aspirational and achieved.</p> <p>E.g. while it may not be possible to build any new Council housing in the next 5 years, you could commit to keep reviewing the target to house everyone on the council housing waiting list as soon as its possible, whether that be by turning unoccupied office space above shops into council homes or building in 5 to 10 years’ time, when economic & political circumstances are different.</p> <p>e.g. regarding protecting Heritage, targets could include to - strengthen Conservation Area codes for developers/ to - deliver a program of restoring traditional street lighting & paving & front garden walls in conservation areas where residents can choose to contribute where homes are not Council owned.</p> <p>Etc etc.</p>		
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